

Development Management Committee

Agenda

Members of the Development Management Committee:

Cllr V Thomson (Chairman)	Cllr T Holden
Cllr L Neal (Vice Chairman)	Cllr C Hudson
Cllr D Bills	Cllr T Laidlaw
Cllr F Ellis	Cllr G Minshull
Cllr J Halls	

Date & Time:

Wednesday 15 March 2023
10.00am

Place:

Council Chamber Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR7 0DU

Contact:

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PUBLIC ATTENDANCE / PUBLIC SPEAKING

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng>

If a member of the public would like to observe the meeting in person, or speak on an agenda item, please email your request to committee.snc@southnorfolkandbroadland.gov.uk, no later than **5.00pm on Friday 10 March 2023**

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 report apologies for absence and to identify substitute members;
2. To deal with any items of business the Chairman decides should be considered as matters of urgency pursuant to Section 100B (4) (b) of the Local Government Act, 1972; [Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency.]
3. To receive Declarations of interest from Members;
(Please see guidance form and flow chart attached – page 5)
4. Planning Applications and Other Development Control Matters;
(attached – page 7)

To consider the items as listed below:

Item No.	Planning RefNo.	Parish	Site Address	Page No.
1	2018/0111/O	LONG STRATTON	Land east of the A140 Long Stratton Norfolk	7
2	2018/0112/O	LONG STRATTON & THARSTON	Land west of the A140 Long Stratton Norfolk	88

Updates received after publication of this agenda relating to any application to be considered at this meeting will be published on our website:

<https://www.southnorfolkandbroadland.gov.uk/south-norfolk-committee-meetings/south-norfolk-council-development-management-planning-committee>

5. Sites Sub-Committee;

Please note that the Sub-Committee will only meet if a site visit is agreed by the Committee with the date and membership to be confirmed.

GUIDELINES FOR DETERMINING THE NEED TO VISIT AN APPLICATION SITE

The following guidelines are to assist Members to assess whether a Site Panel visit is required. Site visits may be appropriate where:

- (i) The particular details of a proposal are complex and/or the intended site layout or relationships between site boundaries/existing buildings are difficult to envisage other than by site assessment;
- (ii) The impacts of new proposals on neighbour amenity e.g. shadowing, loss of light, physical impact of structure, visual amenity, adjacent land uses, wider landscape impacts can only be fully appreciated by site assessment/access to adjacent land uses/property;
- (iii) The material planning considerations raised are finely balanced and Member assessment and judgement can only be concluded by assessing the issues directly on site;
- (iv) It is expedient in the interests of local decision making to demonstrate that all aspects of a proposal have been considered on site.

Members should appreciate that site visits will not be appropriate in those cases where matters of fundamental planning policy are involved and there are no significant other material considerations to take into account. Equally, where an observer might feel that a site visit would be called for under any of the above criteria, members may decide it is unnecessary, e.g. because of their existing familiarity with the site or its environs or because, in their opinion, judgement can be adequately made on the basis of the written, visual and oral material before the Committee.

2. PUBLIC SPEAKING: PLANNING APPLICATIONS

Applications will normally be considered in the order in which they appear on the agenda. Each application will be presented in the following way:

- Initial presentation by planning officers followed by representations from:
- The **town** or **parish council** - up to 5 minutes for member(s) or clerk;
- **Objector(s)** - any number of speakers, up to 5 minutes **in total**;
- The **applicant**, or **agent** or any **supporters** - any number of speakers up to 5 minutes **in total**;
- **Local member**
- Member consideration/decision.

MICROPHONES: The Chairman will invite you to speak. An officer will ensure that you are no longer on mute so that the Committee can hear you speak.

WHAT CAN I SAY AT THE MEETING? Please try to be brief and to the point. Limit your views to the planning application and relevant planning issues, for example: Planning policy, (conflict with policies in the Local Plan/Structure Plan, government guidance and planning case law), including previous decisions of the Council, design, appearance and layout, possible loss of light or overshadowing, noise disturbance and smell nuisance, impact on residential and visual amenity, highway safety and traffic issues, impact on trees/conservation area/listed buildings/environmental or nature conservation issues.

PLANNING APPLICATIONS AND OTHER DEVELOPMENT CONTROL MATTERS

Key to letters included within application reference number to identify application type – e.g. 07/96/3000/A – application for consent to display an advert

A - Advert	G - Proposal by Government Department
AD - Certificate of Alternative Development	H - Householder – Full application relating to residential property
AGF - Agricultural Determination – approval of details	HZ - Hazardous Substance
C - Application to be determined by County Council	LB - Listed Building
CA - Conservation Area	LE - Certificate of Lawful Existing development
CU - Change of Use	LP - Certificate of Lawful Proposed development
D - Reserved Matters (Detail following outline consent)	O - Outline (details reserved for later)
EA - Environmental Impact Assessment – Screening Opinion	RVC - Removal/Variation of Condition
ES - Environmental Impact Assessment – Scoping Opinion	SU - Proposal by Statutory Undertaker
F - Full (details included)	TPO - Tree Preservation Order application

Key to abbreviations used in Recommendations

CNDP - Cringleford Neighbourhood Development Plan

J.C.S - Joint Core Strategy

LSAAP - Long Stratton Area Action Plan – Pre-Submission

N.P.P.F - National Planning Policy Framework

P.D. - Permitted Development – buildings and works which do not normally require planning permission. (The effect of the condition is to require planning permission for the buildings and works specified)

S.N.L.P - South Norfolk Local Plan 2015

Site Specific Allocations and Policies Document

Development Management Policies Document

WAAP - Wymondham Area Action Plan

DECLARATIONS OF INTEREST AT MEETINGS

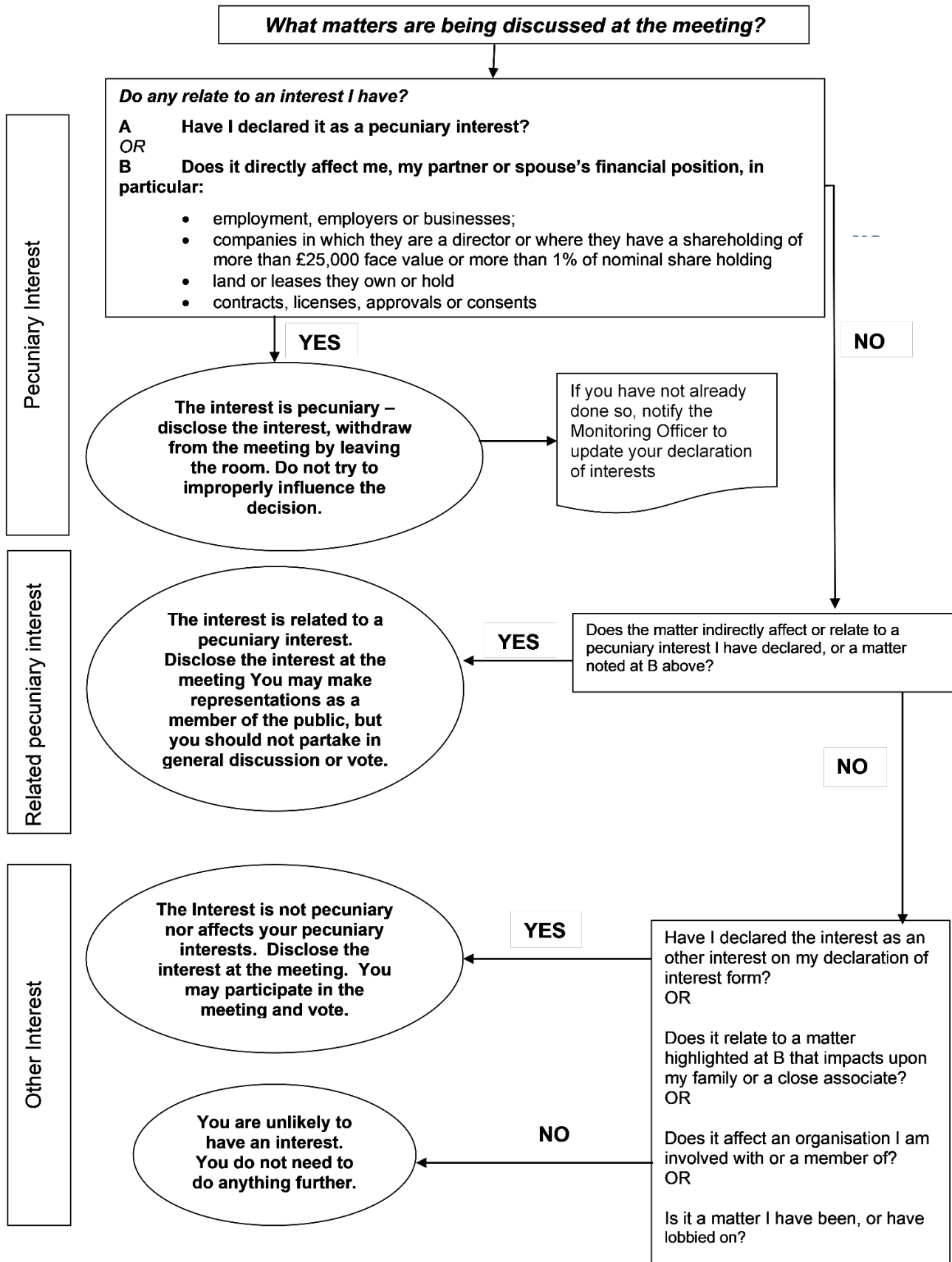
When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda 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.

<p>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>
<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 Council 4. Affect land you or your spouse / partner own 5. Affect a company that you or your partner own, or have a shareholding <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.

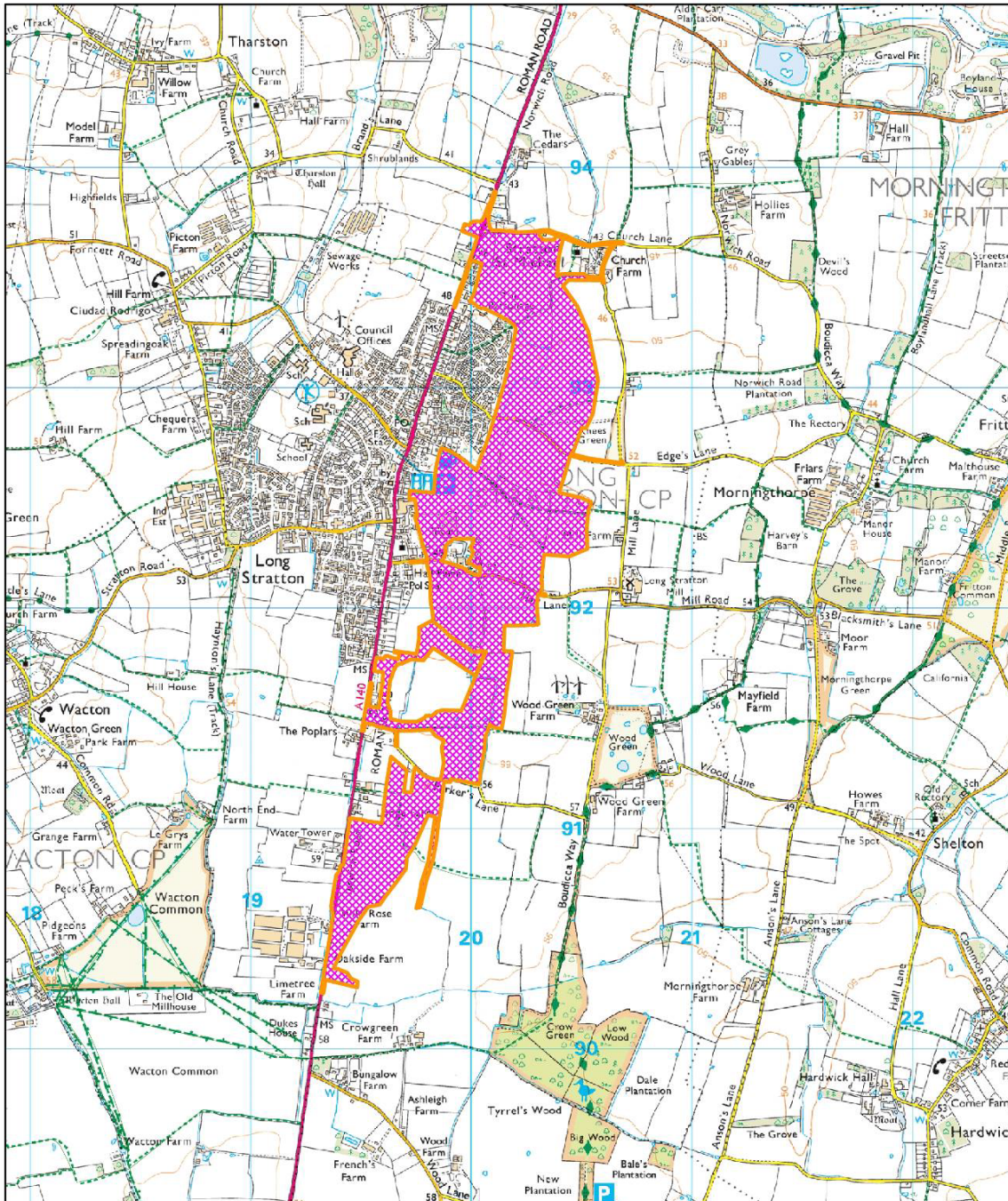
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST INSTANCE

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



PLANNING APPLICATIONS AND OTHER DEVELOPMENT CONTROL MATTERS**Report of Director of Place****Major Applications****Application 1**

2018/0111



1. Application No : 2018/0111/O
Parish : LONG STRATTON

Applicant's Name: Norfolk Land Ltd
Site Address Land east of the A140 Long Stratton Norfolk
Proposal Land east of the A140: Hybrid Application on 131.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 no. dwellings, 8 hectares of employment land for uses within Classes B1, B2 and B8, 2-hectare primary school site, community facilities site, associated infrastructure and public open space. Together with application for full permission for a bypass including roundabouts and junctions.

Reason for reporting to committee

At the request of the Assistant Director Planning due to the strategic nature and scale of the application.

Recommendation summary:

To authorise the Assistant Director of Planning to approve subject to a S106 and the imposition of conditions necessary to make the development acceptable as set out in the report and any further necessary at the discretion of officers in completing any decision and resolving the following key issues:

- Open space phasing
- Nutrient neutrality
- Drainage matters from the LLFA
- Re-consultation with the Integrated Care Board (ICB) in respect of the identified impacts on health and in particular the impact on Long Stratton Medical Centre

1 Proposal and site context

- 1.1 The Proposed Development comprises two concurrent 'hybrid' applications for planning permission as follows:
- 1.2 *Land West of the A140: Hybrid Application on 40.8 hectares of land to the west of the A140 seeking outline planning permission for 387 no. dwellings and 1.5 hectares of Class B1 employment land, associated infrastructure and public open space. Together with application for full planning permission for a western relief road (including a roundabout access at the north to the A140 and a priority junction access to Swan Lane at the south) and with phase 1 housing consisting of 213 no. dwellings, associated infrastructure and public open space. (reference 2018/0112)*
- 1.3 *Land East of the A140: Hybrid Application on 131.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 no. dwellings, 8 hectares of employment land for uses within Classes B1, B2 and B8, 2-hectare primary school site, community facilities site, associated infrastructure and public open space. Together with application for full permission for a bypass including roundabouts and junctions. (reference 2018/0111).*
- 1.4 By way of background the applications were submitted in February 2018 and held in abeyance between early 2019 and May 2021, pending the completion of work in relation to a bid for Major Road Network funding to the Department for Transport, to help facilitate the delivery of the Long Stratton bypass. Norfolk County Council's revisions to the design of the bypass and associated infrastructure have since been introduced to this planning application, and the application amended correspondingly.

- 1.5 Since then, amendments have also been made to address comments arising from consultation and discussion with the applicants and consultees, including Town and Parish Council's, forming part of the consultation process.
- 1.6 This planning application is for land East of the A140 (ref 2018/0111) and comprises of the following key components:
- Outline planning permission for:
- 1275 dwellings, including affordable housing;
 - 8 hectares of employment land for uses within Classes B1, B2 and B8;
 - 2-hectare primary school site;
 - Community facilities site;
 - Associated infrastructure and public open space.
- Full planning permission for:
- A bypass including roundabouts and junctions;
 - Associated landscaping, drainage and infrastructure.
- 1.7 The Application Site is allocated for development identified under Policy LNGS1 of the Long Stratton Area Action Plan (LSAAP), forming part of the South Norfolk Development Plan. An area of land comprising 18.4 Hectare of land forming part of LNGS1 on the eastern side between Hall Lane and Parker's Lane is excluded from this application to be retained as agricultural land, identified as white land on the masterplan.
- 1.8 The application site itself has an area of 131.7 hectares of arable farm land and is located to the west of the A140 road and north-west of the village of Long Stratton, and south of the hamlet of Stratton St Michael. The site is bounded on its northern edge by Church Lane. It is crossed (in an east-west direction) at various points by Edge's Lane, Hall Lane and Parker's Lane, all of which link the A140 to Mill Lane, both of which run in a north south direction.
- 1.9 The A140 is a single carriageway road and is characterised by commercial and residential frontage and provides a strategic link running between the A14 to the south and the A47 to the north.
- 1.10 A network of footpaths and cycleways connect and surround the site including existing local lanes, tracks and footpaths, such as Parker's Lane, Edges Lane and Star Lane which connect Long Stratton with the wider network of Public Rights of Way.
- 1.11 Long Stratton Conservation Area (CA) is located between the two application sites and adjoins a short stretch of the western boundary of the east application site. The west application site lies just northwest of the northern end of the conservation area which encompasses the central core of the village, running north-south along the high street (the old Roman Road, and today, the A140).
- 1.12 There are a significant number of listed buildings within the vicinity of the application sites (approx. 140) which includes Grade I, II* and II listed assets, including the Grade I Building Listed St Michael's Church to the east.

- 1.13 Landscaping is proposed within and around the site, including a broad corridor of land between the new development and the bypass, new woodland planting, open areas with wildflower grassland, green infrastructure and general open space and surface water drainage features (SUDs) such as attenuation ponds and swales.
- 1.14 Access is proposed via a new bypass which will traverse the eastern development areas connecting at the north by a roundabout junction with a new link road to the west and the A140, and to the south by a priority-controlled junction connecting to the A140.
- 1.15 The detailed bypass design is included as part of this planning application, intended to be delivery by Norfolk County Council and is shown on the illustrative masterplan and associated detailed bypass plans.
- 1.16 The application is accompanied by an Environmental Statement submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and has been advertised as such.

The Environmental Statement (ES) as amended covers the following environmental impacts:

- 1.17 This ES document comprises 19 chapters, which provide an assessment of the identified environmental topics, comprising Chapter 1: Introduction; Chapter 2: Methodology; Chapter 3: Site and Planning Policy Context; Chapter 4: Proposed Development; Chapter 5: Society and Economy; Chapter 6: Lighting; Chapter 7: Biodiversity; Chapter 8: Climate Change and Energy; Chapter 9: Landscape and Visual; Chapter 10: Traffic and Transport Chapter; 11: Air Quality Chapter; 12: Noise and Vibration; Chapter 13: Hydrology/Flood Risk/Water Resources; Chapter 14: Cultural Heritage; Chapter 15: Archaeology Chapter; 16: Soils and Agriculture; Chapter 17: Ground Conditions and Contamination; Chapter 18: Cumulative Assessment; and Chapter 19: Conclusions.
- 1.18 The residual impacts arising from the proposed development as amended, are detailed in the submitted Environmental Statement and are addressed in the relevant sections of the report and concluded at the end of this report.

2. Relevant planning history

- 2.1 2018/0112 Land West of the A140: Land West of the A140: Hybrid Application on 40.8 hectares of land to the west of the A140 seeking outline planning permission for 387 no. dwellings and 1.5 hectares of Class B1 employment land, associated infrastructure and public open space. Together with application for full planning permission for a western relief road (including a roundabout access at the north to the A140 and a priority junction access to Swan Lane at the south) and with phase 1 housing consisting of 213 no. dwellings, associated infrastructure and public open space. under consideration

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 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 9 : Strategy for growth in the Norwich Policy Area
Policy 10 : Locations for major new or expanded communities in the Norwich Policy Area

3.3 South Norfolk Local Plan Development Management Policies (SNLP)

DM1.1 : Ensuring Development Management contributes to achieving sustainable development in South Norfolk
DM1.2 : Requirement for infrastructure through planning obligations
DM1.3 : The sustainable location of new development
DM1.4 : Environmental Quality and local distinctiveness
DM3.1 : Meeting Housing requirements and needs
DM3.8 : Design Principles applying to all development
DM3.11 : Road safety and the free flow of traffic
DM3.12 : Provision of vehicle parking
DM3.13 : Amenity, noise, quality of life
DM3.14 : Pollution, health and safety
DM3.15 : Outdoor play facilities/recreational space
DM4.2 : Sustainable drainage and water management
DM4.4 : Natural Environmental assets - designated and locally important open space
DM4.8 : Protection of Trees and Hedgerows
DM4.9 : Incorporating landscape into design
DM4.10 : Heritage Assets

3.4 Site Specific Allocations and Policies

Long Stratton Area Action Plan (AAP)
LNGS1: Land East, South-East and North-west of Long Stratton
LNGS2: Town Centre Policy
LNGS5: General Green Infrastructure Requirements for New Developments within Long Stratton AAP Area
LNGS7: New Recreational Provision in Long Stratton
LNGS9: Accessibility

3.5 Long Stratton Neighbourhood Plan (LSNP)

SC1: Housing Mix
SC2: Specialist and Supported Housing
SC3: Affordable Homes
SC4: Pedestrian and Cycle-friendly Neighbourhoods
SC5: Maintaining Good Connectivity with Outlying Areas
SC6: Location of New Community Facilities
DC7: Landscape and Settlement Character
DC8: Creating Successful Neighbourhoods
DC9: Strengthening and Enhancing Long Stratton's Historic Core

DC10: Long Stratton Design Principles
 TC13: Re-establishing The Street as the Heart of the Town
 GI16: Long Stratton Recreational Open Space Standards
 GI17: Delivering Green Infrastructure in Long Stratton
 GI18: Green Infrastructure Management
 GI19: Protecting Existing Sites of Biodiversity Value in the Plan Area
 R20: Delivering a New Community Meeting Space in long Stratton
 C22: Fibre to the Premises

3.6 **Supplementary Planning Documents (SPD)**

South Norfolk Place Making Guide
 Guidelines for Recreation Provision in new Residential Development

Statutory duties relating to Listed Buildings, setting of Listed Buildings and Conservation Areas:

S66(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, 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.

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 (summarised)

4.1 Long Stratton Town Council

Comments on originally submitted documents (03.04.2018)

- Proposals conflict with the environmental strategy and the transport policy within the Long Stratton Area Action Plan (LSAAP) - Numbers, 2,3 and 7 contradicts the environmental strategy and the transport policy within the LSAAP.

Comments on amended proposals (17.09.2021)

- Require further submissions from the applicants which demonstrates compliance with the Neighbourhood Plan notably:
- The needs of older people through accessible, adaptable housing as set out in Policy LSNP – SC1
- The inclusion of specialist and supported housing to meet the needs of the population set out in Policy LSNP SC2
- Affordable housing provision at a rate of 33% of the development including a meaningful proportion of affordable homes being delivered as part of market sites will be prioritised for those residents with a close connection to Long Stratton set out in Policy LSNP SC3. A close connection to Long Stratton is defined at paragraph 5.1.28 of the Neighbourhood Plan.
- A viability assessment which is NPPG compliant and a critical review by the District Council including an effective review date of any conclusions. The Town Council would suggest a review at each phase of development.
- A schedule of the Open Space Needs calculations using Figure 5.13 together with a schedule of how that Open Space is secured to ensure that the requirements are being appropriately met.

- S106 obligations to secure training for Long Stratton's local workforce to facilitate the delivery of skills training or apprenticeship schemes to the local people
- The development proposals should set out how S106 contributions will secure these interventions to improve public realm and the mechanisms and timescales for declassification of the A140 through Long Stratton.
- Outlines their compliance with the Long Stratton Design Guidelines particularly with reference to pedestrian and cycle connectivity, boundary treatments between existing communities and proposed new communities, road dimensions and vehicle access, vehicle parking solutions, architectural details and material palette and sustainable design.
- Objects to location of the Community Hub, Car Parking and School to the north of Star Lane.
- Objects to current provision and location of land for the Community Space.
- Concerned that the Sports Pitches provided in Development Parcel CH2 are separated from the community by the Link Road. Some concern that the football pitches are too close to the A140 and conflicts with Neighbourhood Plan Policy LSNP GI17.
- Town Council requires further analysis and discussion with the applicants to understand the assumptions on Open Space Contributions and whether this satisfies the requirements of Policy LSNP GI18.
- Neighbourhood Plan Policy LGNS 9 of the LSAAP requires that development maximises permeability for pedestrians and cyclists by improving access to/from existing and new key services and facilities.

Comments on amended proposals (15.03.2022)

- Overall LSTC do not object to the applications and welcome the opportunity to work with NH/NL to get the best for the local community, there is a lot of positive contributions such as open space provision and formal play areas however, more information is required as there are areas of concern.
- LSTC are concerned that the proposed sports pitches being beside the bypass will mean the school children using them will be inhaling harmful toxins.
- From last report objecting to the community hub location, NH/NL have addressed some of the reasons for the change of location, one being that if you have to change the topography to create sports pitches you can create problems elsewhere and the changed topography can take years to settle

4.2 Hempnall Parish Council

Comments on originally submitted documents (19.02.2018)

- Neither approve or refuse
- If approved, serious mitigation consideration should be given for the effect on Hempnall and surrounding villages
- Serious concerns of increased 'rat runs' through the Krons and Hempnall Street
- Suggest fewer roundabouts so new road functions as a free flowing bypass rather than distributor.

Comments on amended proposals:

- No comments received

4.3 Pulham Market Parish Council

Comments on originally submitted documents (12.03.2019)

- Neither object or support
- Serious concerns regarding impact of additional traffic generated, particularly traffic connecting to the A140 via Swan Lane
- Essential the bypass is built and new houses are supported by a new connection to the A140.

Comments on amended proposals:

- No comments received

4.4 Topcroft Parish Council

- No comments received

4.5 Woodton Parish Council

Comments on originally submitted documents (16.03.2018)

- No views or comments
- Consideration to be given to increase in traffic that could potentially cut through Woodton using B1527.

Comments on amended documents (30.08.2021)

- Although the planned development might be appropriate for this location in that it might help keep unnecessary development out of local rural villages such as Woodton, the increase in traffic is inevitable.
- Has the necessary supporting infrastructure of schools, doctors' surgeries and shops been fully addressed should this development proceed?
- Any traffic wanting to head west towards Bungay, Beccles, Lowestoft and the Suffolk coast is likely to travel via Woodton on the B1527. Although the signed route for traffic is via Church Road, many drivers cut through the centre of Woodton village using the Hempnall Road. The potential increase in traffic is of serious concern to residents of Woodton.

4.6 Fornsett Parish Council

Comments on originally submitted documents (16.03.2018)

- No objection
- Concerns regarding bypass - consideration should be given to the plans for the road to be a dual carriageway
- Impact of additional traffic on villages either side of Long Stratton
- Imperative roundabout replaces crossroads at Hempnall
- Existing strains on services

Comments on amended proposals:

- No comments received

4.7 Newton Flotman Parish Council

Comments on originally submitted documents (26.07.2019)

- Objects
- Generally happy with the proposed development at Long Stratton including the by-pass however, the impact of the increased density and volume of traffic will create intolerable problems to the already dangerous junctions with the A140 in Newton Flotman.
- The proposed bypass will even up the flow of northbound traffic making it much more difficult to leave the village and therefore creating a bottleneck around what is a complex series of junctions
- The recommendations of the Transport Assessment are inadequate, and could even make matters worse and full design of the of the junctions is required before the full development and the bypass.

Comments on amended proposals:

- No comments received

4.8 Tivetshall Parish Council

Comments on originally submitted documents (19.03.2018)

- Application should be refused
- Existing infrastructure unable to cope with existing demand which will be exacerbated
- Dual carriageway is essential for proposed bypass
- Single carriage way bypass is inadequate
- Medical services overstretched and addition provision needs to be considered
- Education currently oversubscribed – primary school needs to be built alongside the new homes
- Additional parking required in village centre

Comments on amended proposals:

- No comments received

Shelton and Hardwick Parish Council

Comments on originally submitted documents (19.03.2018)

- Concerned that the access route to Long Stratton is maintained, but is a safe and viable means of accessing the required facilities. Whilst it is welcome that a route into Long Stratton remains available, the PC would suggest that a bridge over the bypass at this point would be much safer.
- 4 proposed roundabouts is too many
- Employment proposed at southern end of application will impact Wood Green and damage the tranquillity

Comments on amended proposals:

- No comments received

4.9 Starston Parish Council

Comments on originally submitted documents (20.03.2018)

- Neutral
- No comments made

Comments on amended proposals:

- No comments received

4.10 Tasburgh Parish Council

Comments on originally submitted documents (21.03.2018)

- Neither approve or refuse
- Vast number of application documents to enable informed views
- Strongly support dual carriageway
- No consideration given improvements to Church Road junction
- Cycle path to Brands Lane should be extended to Tasburgh

Comments on amended proposals (07.09.2021)

- To re-affirm the previous comments submitted on 21 March 2018
- To include further concerns which have been raised with regards to delays in exiting the Church Road junction and the impact this will have on local traffic diverting and using Low Road as a preferred option of accessing the A140 via the Hempnall roundabout.

4.11 District Councillor

Comments on originally submitted documents (19.02.2018)

- Should only be determined by the Committee due to the scale and significance of this scheme (Cllr Des Fulcher – note no longer a local member).

Comments on amended proposals:

- No comments received.

4.12 Richard Bacon MP

- No comments received

4.13 SNC Housing Enabling Officer

Comments on amended proposals (28.02.2023)

- No Objection
- The affordable housing obligation applying to both applications (2018/011 - East of the A140, and 2018/0112 – West of the A140) will be:
 - - Affordable housing percentage: 14.13% on-site.
 - - Overall tenure split: 60% rented housing / 40% affordable ownership.
 - - This tenure split to apply to each Phase.
 - - The precise mix by type and tenure to be agreed at Reserved Matters stage on a Phase by Phase basis.
 - - During the construction of each Phase there will be a review of the financial appraisal to establish whether more affordable housing is to be provided on-site.
- The total number of dwellings proposed is 1,875 (1,275 east of the A140 plus 600 west of the A140). The required number of affordable homes will be 265 (159 for rent and 106 affordable ownership).
- Applying the 14.13 percentage and the 60/40 tenure split means that the 1,275 dwellings east of the A140 will include 180 affordable homes (108 for rent and 72 affordable ownership).
- Each Phase will require an Affordable Housing Scheme, which must be approved by the Council. The Housing Enabling Team will seek to ensure that the mix type and precise tenure (within the specified 60//40 split) meets identified housing need.

4.14 Senior Heritage & Design Officer

Comments on originally submitted documents (summarised) 24.08.2018

- Heritage Statement: Emphasis on the impact on the more significant grade II and II* is acceptable – but potential degrees of harm could more clearly be attributed to the grade II assets so that they are taken into account in the planning balance, even if it is considered relatively low.
- The emphasis throughout the documents is on achieving quality landscaping and this should be carried through at reserved matters stage.
- Good integrated cycling/pedestrian connections linked to landscaping with and between neighbourhoods and the town (although these will at some stage need further development). Also the need for good pedestrian/cycling connections onwards from the neighbourhoods to lanes and footpaths to the east of the bypass for rural access.
- Will assist in creating a distinct sense of place, or places, based on neighbourhoods with a strong rural rather than urban character and is a good starting point for further design work to be carried out with reference to the South Norfolk Place Making Guide and Building for Life principles at the reserved matters stages.
- Care needs to be taken with the landscaping around the two listed churches and their connections with the new neighbourhoods, particularly St Michaels.
- St Michaels is identified as being moderately/large harmed. Access to St Michaels across the bypass needs to be accessible and attractive. The setting of the Old Rectory is also similarly harmed with losing its remaining connection to the open countryside and the church to its north with the resulting development.
- Selection of appropriate tree species for newly planted areas could improve the setting of listed buildings if appropriately selected for traditional rural context not just for noise or visual screening.
- Although a mixture of parking solutions with most parking on plot is welcomed – the design code should avoid including the diagram of large rear parking court with no clear surveillance.
- Careful planning of Hall Lane approach – and perhaps a more informal, more rural landscape solution for the field between Hall Farm and the Church rather than a football pitch?
- Concern at the ‘disconnection’ of the southern commercial site from the rest of the proposals – particularly for sustainable pedestrian and cycle links.
- The impact of the commercial site to the south, which is going to be quite large, will have a direct impact on a number of nearby heritage assets along Ipswich Road and this is to some extent underplayed in the Heritage Statement.

Comments on amended proposals:

- No objection.

4.15 SNC Environmental Quality Team

Comments on originally submitted documents (28.02.2018)

- Lead Local Flood Authority is the statutory consultee for providing the technical assessment of this application

Comments on amended proposals (25.09.2021)

- The investigation and risk assessment into the potential for both soil contamination and ground gas to be present has been carried out in-line with current industry best practice and British Standards and is satisfactory. No further investigation and/or risk assessment is required in general.

- The area of development is wide and there remains a chance of contamination being present, this can be managed by a suitably worded condition relating to Contaminated land during construction and a Construction Management Plan.
- Requirement of a Construction Environmental Management Plan, and a condition suggested relating to noise and dust management scheme.
- Noise Remediation Scheme: The assessment has identified that certain blocks of houses proposed in the west application may have facades that would be above desirable noise levels. Further mitigation is required. Condition suggested relating to noise mitigation scheme for certain accommodation blocks.
- Noise and Vibration During Construction: mitigation measures as defined in BS5528 parts 1 and 2 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise and vibration disturbance from construction workers. The measures should be submitted to the local planning authority for approval before commencement of works.

Comments on amended proposals (14.02.2023)

- Do not wish to object
- However, recommend any approval of this application includes conditions relating to noise assessment, implementation, and validation; implementation of changes to the master plan or approved odour remediation scheme and validation; lighting; construction impacts; construction management plan; unknown contamination and imported material.

4.16 Landscape Architect

- No objections.

4.17 NCC Planning Obligations

Comments on originally submitted documents (31.07.2018)

- Insufficient places available at local schools to accommodate the children arising from this development.
- A new 2 Form Entry Primary School would be needed to accommodate the children from this hybrid application
- A 2 ha site would be required to accommodate a new 2FE primary school. The County Council would expect the free transfer of land for the new school site to be provided through a S106 agreement
- CIL funding would be required to support additional places in the Early Education sector and at Long Stratton High School
- Fire hydrants will be required as per existing standing arrangements and also sought in respect of commercial developments.
- Strongly recommend the installation of sprinklers in all domestic and commercial developments
- Norfolk Library Service: a contribution of £244 per dwelling will be sought. Based on 600 dwellings the total contribution sought will be £146,000.

Comments on amended proposals:

- Reiterates previous comments dated July 2018

Comments on amended proposals (23.02.2023)

- Reiterates previous comments dated July 2018

Additional comments:

- Children's Services would wish for a new school to be opening around occupation of 400 dwellings across the two sites. After considerable discussions with the applicant, we have reluctantly agreed to transfer the school site on occupation of 150 dwellings on the Eastern site

4.18 NCC Minerals and Waste

Comments on amended proposals (23.01.2023)

- No safeguarded mineral resources occur within the areas identified for built development, although some of the areas of open space close to the Water Recycling centre are underlain by safeguarded sand and gravel
- South Norfolk Council should ensure that Anglian Water as the operator of the Water Recycling Centre continues to be consulted regarding potential impacts on the existing operation from proposed development

4.19 Ecologist

Comments on originally submitted documents (21.03.2018)

- Satisfied from review of the submitted documents that the development could take place in line with relevant National and local Environmental Policies and European and UK Habitat and Species legislation
- significant mitigation or compensatory habitat may be required within the full applications including off-site mitigation for the areas of bird nesting habitat being lost.
- Negative effects to nesting birds are predicted due to habitat loss and disturbance
- The EcIA follows best practice guidance and all relevant habitats and species have been assessed as well as mitigation
- further ecological surveys will be necessary to revalidate the results and conclusions be drawn from them prior to the start of works
- all international statutory designated nature conservation sites are over 3km from the LSAAP development area,
- LSAAP is not predicted to have a LSE on any of the international statutory designated nature conservation sites within 25km of it.
- agree with the conclusions of the HRA Screening exercise that; "the provision of Green Infrastructure on the LSAAP site is considered sufficient to ensure it would not contribute to cumulative LSEs on designated sites

Comments on amended proposals (17.09.2021)

- Masterplan: Does not appear to be detailed landscaping plans for individual sections of the road available to view. The landscape masterplan provided for the whole road is not very clear because it is zoomed out and details for each section of the road have not been provided.

The landscape masterplan should differentiate between SuDS and existing or proposed ponds designed to retain water. We would encourage the creation of waterbodies that are designed to retain water all year around.

- The scope of the updated ecology surveys outlined in the Biodiversity Chapter of the ES dated May 2021 are appropriate.
- Net Biodiversity Gain:
 - Section 7.249 of the Biodiversity Chapter refers to the need to reassess trees due to be felled for bat roost potential, however other arboricultural works for example, ivy removal, crown raising, limb removal could also potentially impact on roosting bats.

- Intention to join the GCN DLL scheme: It must be clear the process that the applicant intends to follow with regards to GCN DLL and as agreed with Natural England (including who would be responsible for assessing the impacts at each stage.)
- The LEMP outlines habitat and species enhancement measures that will be provided, however there is very little information on the minimum areas of habitat enhancement that the applicant will be committing to providing or enhancing. The plan should also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/ or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

Comments on amended proposals (25.02.2022)

- Recommendations in line with comments dated 17/09/21
- Enhancements such as bat boxes, bird boxes, and hedgehog gaps will need to be defined on the building plans and landscape plans to indicate where they are to be located to follow recommendations in the LEMP
- Ahead of construction the advice strategies and mitigation from the Environmental Statement: Biodiversity Chapter 7 should be incorporated into a Construction Environmental Management Plan (CEMP).
- A 'statement of good practice' shall be signed upon completion by the competent ecologist, and be submitted to the LPA, confirming that the specified enhancement measures have been implemented in accordance with good practice upon which the planning consent was granted

Comments on amended proposals (03.03.2022)

- Ahead of construction the advice strategies and mitigation from the Environmental Statement: Biodiversity Chapter 7 should be incorporated into a Construction Environmental Management Plan (CEMP) in accordance with BS42020:2013 D.4
- A 'statement of good practice' shall be signed upon completion by the competent ecologist, and be submitted to the LPA, confirming that the specified enhancement measures have been implemented in accordance with good practice upon which the planning consent was granted.

Comments on amended proposals (14.02.2023)

- It is not possible to ascertain that the proposal will not result in adverse effects on the integrity of the Broads SAC and Broadland Ramsar. It is advised that the shadow HRA is not adopted by the LPA and that permission should not be granted at this stage.
- Having agreed use of 110 l/p/d Stantec have however calculated TP and TN based on water usage of 120 litres/person per day. It is recommended, that the calculation is corrected to reflect the average water usage of 110 l/p/d rather than 120 l/p/d.
- For clarity a plan is requested which show the areas from which the existing land use types have been calculated.
- There should be scientific certainty that the NN measures will deliver the required reduction, and there should be practical certainty that the measures will be implemented and in place (secured and funded for the lifetime of the development).
- Because options are provided for the long-term strategy there cannot be scientific certainty that the measures will deliver the required reduction (i.e. Any offsite mitigation would need to be secured (for the lifetime of the development) as part of a S106 at outline and the WWTW upgrades cannot be relied upon until legislation securing the requirement for water companies to achieve TAL is in place.
- Application should include evidence that fallowing has been agreed with the landowner
- The additional land required to mitigate NN may affect the area of land available for recreation, which is also required to mitigate impact on Habitat Sites. This will need to be considered as part of the shadow GIRAMS HRA to show that the application will still deliver open space of a sufficient quantity.

- The RAMS tariff will need to be secured via a S.106 to mitigate potential in combination recreational impacts on the Brecks, Broad, East Coast and Norfolk Valley Fens Habitat Sites.
- It is recommended that each RM is accompanied by a detailed Biodiversity Method Statement and a Biodiversity Net Gain Audit.
- Extent of hedges to be provided off site to be included in S106.
- Skylark compensation is addressed within the S106
- A Lighting Design Strategy will need to be conditioned for each phase which considers a Dark Corridor condition.
- The first RM application for each phase must be accompanied by valid ecological information
- Updated LEMP to be submitted with each RM, including a LEMP for the proposed wetland areas required to mitigate Nutrient Neutrality.
- Where SuDS do not form part of the open space it is recommended that permanent water to provide wildlife habitat is secured as part of the Biodiversity Method Statement condition.
- The applications have been accepted into the District Level License (DLL route). A countersigned Impact Assessment Conservation Payment Certificate, and map has been received by the LPA.
- The Landscape Masterplan should be amended to include all areas within the red-line and exclude those outside
- Applicant to consider new friendly drainage designs for GCN at detailed design stage.
- Suggested wording for conditions for water efficiency, Biodiversity Method Statement, Biodiversity Net Gain Audit, Construction Environmental Management Plans, Landscape and Ecological Management Plans, Dark Corridors, Lighting design strategy for biodiversity, further surveys if required and copy of the Protected Species licence.

4.20 NCC Highways

Comments on originally submitted documents (21.07.2018)

- Regarding the design of the bypass and some issues surrounding the (TA): primarily concern lack of information and requires explanations as to how conclusions regarding the distribution of traffic were obtained.
- Concern has been raised regarding the 'White Land' and the HA has requested additional work be undertaken as a sensitivity test to establish any potential impacts that development on this 'White Land' would have on the proposed bypass scheme.
- The bypass design itself: the HA is working with the developer to assess the current bypass proposals and to develop a scheme, which the highway authority considers deliverable.
- The application in its present form does not address concerns regarding linkage from the development on the East to the village centre and to facilities such as the high school, shops and medical centre. Further information is required on how such linkages (in particular walking/cycling) are to be brought forward. Information is also required on any potential place making proposals for the village centre and any potential impacts on transport including bus services.
- Further information is also required as to how bus services will operate and serve both sides of the development.

Comments on amended proposals (07.10.2021)

- No objection subject to conditions
- It is considered that the occupation of 250 dwellings (across both applications) should be the trigger for the bypass as in line with LSAAP. Conditions have been requested that reflect this

- LSAAP also requires good walking and cycling links to be provided linking the new development to the town centre. There are no proposals to provide enhanced links particularly in the form of cycling provision along the A140. This is not considered acceptable and does not comply either with the LSAAP nor with NPPF which requires sustainable measures to be brought forward. Conditions have been suggested that require the provision of such links.
- Hall Lane is not of an appropriate standard for large scale growth and cannot be improved to an appropriate standard to cater for a significant increase in traffic. In addition the junction of Hall Lane and the existing A140 is constrained and it is considered that there is limited opportunity to improve it. The HA has suggested conditions which restrict access from the development to Hall Lane

Comments on amended proposals (28.03.2022)

- Reiterates comments above dated 07.10.2021.

Comments on amended proposals (23.02.2023)

- Has no objection subject to conditions.

4.21 NCC Public Rights of Way Officer

Comments on originally submitted documents (31.07.2018)

- NCC do not consider the proposed uncontrolled crossings are safe given the speed and traffic volumes (>12000 vehicles per day). NCC do not consider that the applicants have suitably justified their approach as required by best practice/technical guidance.
- Solutions to addressing PRow affected by the bypass, must result in attractive and safe routes to encourage their use by new and existing residents in line with NPPF and LSAAP requirements.
- NCC would urge a reconsideration of the approach to PRow crossing points, with some significant enhanced crossing provision. We would suggest that pedestrian bridges should be considered to provide suitable and safe crossing by the public. Pre-application comments suggested locations for bridges
- In terms of the permeability and hierarchy of the local PRow network, the most useful locations for bridges would be at Edge's Lane (FP13), and at FP 7 linking to St Michael's Church
- A pedestrian bridge at the southern end of the scheme would also be desirable, but it is considered a lesser priority than those discussed above.
- The willingness of the applicants to create routes alongside the bypass is welcomed.

Comments on amended proposals (07.10.2021)

- It is accepted that six PRow will be dissected by the construction of the bypass. Affected PRow are recorded as: Long Stratton Footpaths 7,13,15,16,21 and 26.
- It is also accepted that in order to enable the bypass scheme to be deliverable, all six PRow will have to be diverted onto new alignments. It understood, although not necessarily agreed with on grounds of enjoyment of the PRow and safety of users, that only one pedestrian/cycle only overbridge is included in the bypass design with the only other over-bridge crossing being a shared use facility along a vehicular over-bridge, and the other PRow crossings will be at grade.
- The proposed north-south pedestrian/cycle way along the length of the bypass must be provided to facilitate sustainable travel choices for residents.

- It is welcomed that the proposals have considered the wider PRow network in the vicinity, as well as the relationship with the new development and its walking/cycling provision and not purely focussed on only the sections of PRow immediately affected by the bypass.
- It is welcomed that our comments made in 2018 have been noted and incorporated into the design where possible. Further discussions are required to improve the detail of the proposed diversions.
- To make a full evaluation of these proposals, we require additional information and discussion on the specifics of each PRow diversion as there are missing details or provision is not suitable for what is being proposed. We would not wish post-construction for the PRow to be obstructed and inaccessible to users and so it is essential this information is clarified now and any drawings reflect this.

Comments on amended proposals (23.02.2023)

- The Design Code January 2022 (Revised January 2023) has not clarified how the severance of FP8/FP25 is to be incorporated into the design in terms of its connection to the new road, its continuation or how east/west pedestrians are to safely cross the road. This point was raised in our previous comments of September 2021 and March 2022.
- FP8 / FP25 has been incorporated into an area of public open space which goes some way in retaining its current rural setting. The landscape masterplan shows other recreational paths linking into it although there seems to be an overlap of the two in places. Details are needed of the layout in this area to ensure this PRow is not obstructed but fully utilised as providing the development connectivity and integration from the on-site recreational provision into the existing PRow network.

Comments on amended proposals

- NCC PRow have no additional comments to make in respect to the bypass PRow diversions except that any further design changes to the bypass layout or associated drainage features will need further discussion with the PRow team to ensure there will be no additional adverse effects.
- This does not mean that we would not have additional comments to make in respect to the development as a whole when details are submitted in respect to detailed design and layout where PRow may be affected and we would expect to be consulted on this at a later stage.
- It is noted that additional non-motorised routes are being offered as part of the development proposals that link into the existing PRow network. The proposed north-south pedestrian/cycle way along the length of the bypass must be provided to facilitate sustainable travel choices for residents
- It is welcomed that the proposals have considered the wider PRow network in the vicinity, as well as the relationship with the new development and its walking/cycling provision and not purely focussed on only the sections of PRow immediately affected by the bypass.

4.22 National Planning Casework Unit

- No comments received

4.23 NCC Historic Environment Service

Comments on originally submitted documents (31.07.2018)

- Further information is required about the presence, extent, form, date, surviving condition and significance of the heritage assets with archaeological interest at the site before a fully informed planning recommendation can be made about the historic environment implications of the proposed development

- Preliminary advice in accordance with para 128 of NPPF, is that a programme of archaeological trial trenching is carried out to support the geophysical survey and that the results are submitted to South Norfolk Council and Norfolk County Council Environment Service for consideration prior to the determination of the planning application

Comments on amended proposals (07.09.2021)

- Previous advice still stands
- Pre-application geophysical survey and desk-based assessment has been completed and we are happy that the remainder of the archaeological mitigation can be achieved through the appropriate planning condition.
- For the planning application as a whole, if planning permission is granted, suggest 3 conditions are imposed relating to the submission and approval of, and development completed in accordance with, archaeological written scheme of investigation

Comments on amended proposals (07.10.2021)

- Trial trenching along the route for the proposed bypass/relief road and areas for further mitigation have been identified and agreed. My current understanding is that mitigation fieldwork is planned for spring 2022. Archaeological work is much less advanced in the non-road parts of the application area.
- Suggest the conditions listed in previous comments dated 07.09.2021 are imposed.

Comments on amended proposals (27.01.2023)

- We have no comments on the additional documentation submitted as it is largely related to natural environment matters.
- Both applications sites are large and their archaeological potential has been demonstrated by various episode of fieldwork.
- There is potential for previously unidentified heritage assets with archaeological interest (buried archaeological remains) to be present within the current application sites 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.
- A very slightly revised recommended condition wording should be with you shortly, sent via the Norfolk County Council planning team.

Comments on amended proposals (23.02.2023)

- Geophysical survey of the whole application site has already taken place. Trial trenching along the route for the proposed bypass/relief road and areas for further mitigation have been identified and agreed. Suggest archaeological planning condition and wording.

4.24 NCC Lead Local Flood Authority (LLFA)

Comments on originally submitted documents (12.06.2018)

- The LLFA object to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy relating to:
- The lack of consideration for the risk of flooding from the watercourses to the proposed developable area to ensure that all proposed development (including housing, roads and SuDS features) is not at risk of flooding and does not increase the risk of flooding elsewhere

- The lack of consideration for the risk of groundwater flooding to the site
- The lack of sufficient detail for the drainage proposals to show how the drainage hierarchy has been achieved.
- An adequate demonstration that the development is in accordance with the NPPF with regard to the risk of flooding.

Comments on amended proposals (02.09.2021)

- No objection subject to conditions being attached to any consent if this application is approved and the applicant agrees with pre-commencement conditions.

Comments on amended proposals (10.09.2021)

- Further information is requested from the applicant to robustly show the existing risks of flooding and ensure that there is no adverse impact from the development. We would also welcome if the FRA/drainage strategy could identify any opportunities to provide betterment of any existing problems.
- Overall, the LLFA find the results of the bypass and post-development model so far both positive, with most of the flooding from baseline outputs reduced or removed in some areas altogether.
- Headline points:
- Additional sensitivity testing and further information is requested on the proposed mitigation strategy and modelling report.
- The separate Outline Drainage Strategy (1275 Homes) by Stantec appears to have not been submitted with the FRA and the Preliminary Drainage Plan in the FRA appendices uses an older site layout.
- Insufficient detail provided on the drainage proposal(s)
- The Full Drainage Strategy (Bypass) proposes a contradictory method for sizing the bypasses contributing runoff areas (roads drainage catchment), a different method is used for calculating the permitted flow rates and then storage volumes. Further clarification is required.
- Further information regarding the proposed flood mitigation proposals and the justification of the model techniques used is required.
- An adequate demonstration that the development is in accordance with the NPPF regarding flood risk.

Comments on amended proposals (23.02.2023)

- The LLFA have reviewed the additional information provided in the updated application that relates to how the proposed scheme will deliver the nutrient neutrality requirements for this application.
- Since issuing this letter the national climate change guidance for flood risk assessments was updated in May 2022, so that a specific river catchment climate change allowance is now applied
- In relation to the proposed surface water drainage schemes where the peak rainfall intensity is applied the majority of this will apply to the proposed outline development. Therefore, the LLFA would seek to update our previous recommended conditions to reflect this increase to 45% for the 1% AEP and 40% for the 3.3% AEP event. However, for the surface water drainage within the full planning application area, the LLFA will require the updated surface water drainage modelling for 1% plus 45% climate change to be provided along with the 3.3% plus 40% for climate change. The above matters will need to be satisfactorily addressed as part of this application process.

- The LLFA notes the nutrient neutrality requirements have seen a revision in the proposed outline drainage design for the residential and mixed-use development areas that results in a wetland area being placed on the downstream end of the proposed surface water drainage system. To facilitate the inclusion of the wetlands, the proposed drainage system has seen in some case the minor adjustments of the location of other attenuation and conveyance features. The LLFA will recommend a condition for this outline application area of this hybrid planning submission that the applicant provides evidence that demonstrates the inclusion of the wetlands has not reduced the surface water attenuation capacity.

4.25 Natural England (NE)

Comments on originally submitted documents (23.03.2018)

- No objection subject to appropriate mitigation being secured fully through appropriate planning conditions or obligations.
- Recommends the following measures are addressed/secured:
 - Ensure that the GI proposals are in full accordance with the policies and provisions contained in the LSAAP, including the delivery of sufficient appropriate green space provision and capacity for dog walking;
 - Identification of exactly how recreational disturbance impacts to Fritton Common SSSI and Pulham Market Big Wood SSSI will be prevented;
 - How sufficient financial contributions for the management and maintenance of GI will be secured and maintained long term, it would be better if this could be done holistically across the applications;
 - How GI will be phased to ensure it is delivered in a timely and appropriate manner;
 - Suitable connections created to link to other off-site accessible GI including footbridges over the new roads, where appropriate and in accordance with the LSAAP; and
 - How the proposed GI mitigation will be monitored post-development to measure its effectiveness
- Based on the mitigation measures proposed within the planning application documents, the proposals are unlikely to have a significant effect on the above SAC, SPA or Ramsar site. We also consider they are unlikely to adversely affect the above SSSIs. In order to mitigate these adverse effects arising from recreational disturbance, and make the development acceptable, the on-site green space provision and capacity as proposed in the outline application needs to be secured legally.

Comments on amended proposals (08.09.2021)

- No objection subject to mitigation, as consistent with our previous advice dated the 23rd March 2018.
- Recommend consideration of the soon to be adopted Norfolk Green Infrastructure and Recreation Avoidance and Mitigation Strategy (GIRAMS) and the inclusion of biodiversity net gain in the National Planning Policy Framework in relation to the proposals
- To provide adequate mitigation onsite GI should be designed to provide a multifunctional attractive space of sufficient size to reduce frequent visits to designated sites. It should facilitate a variety of recreational activities whilst supporting biodiversity
- Recommend resident dog walkers have access to promoted and signposted circular walks, of average length onsite and/or within walking distance of the proposed development.
- Welcome the inclusion of SuDs
- LPA to consider proposals and GIRAMS

- Biodiversity Net Gain as per Para 174, 180 of NPPF

Comments on amended proposals (16.02.2022)

- The advice provided in our previous response applies equally to this amendment.
- Natural England welcomes the amendments to the environmental statement such as the inclusion of porous fences for hedgehogs and bird nest boxes on 80% of housing, as well as considering recreational disturbance on Fritton Wood SSSI.
- Welcome the additional detail given in the Revised Design Code.
- No further comment to make but refer you to our previous advice.

Comments on amended proposals (14.02.2023)

- Further information required to determine impacts on designated sites, including:
- An updated Nutrient Neutrality (NN) Assessment and Mitigation Strategy which uses the appropriate land use categories and guidance methodology for calculating efficiency of mitigation measures, as well as providing sufficient certainty over the proposed mitigation
- An updated Habitats Regulations Assessment that secures appropriate and sufficiently certain mitigation measures at the appropriate assessment stage. This includes consideration of the impacts from increased recreational disturbance and increased nutrient loading.
- Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained.

4.26 Historic England

Comments on originally submitted documents (13.03.2018)

- Concerns regarding the application on heritage grounds owing to the harm caused by the proposal to the setting of the designated churches of St Michael and St Mary, the Long Stratton Conservation Area, and Nos. 1 & 2 Church Lane.
- We consider the harm to the conservation area and to the Church of St Mary would be of a low to moderate level. However,
- Recognise the benefits to the conservation area of removing the traffic, and of the potential for enhancements to be made to the area's public realm.
- Historic England considers overall that there will be less than substantial harm to the significance of the heritage assets, which should be appropriately weighed against the public benefits of the development, in line with national planning policy.
- Application to ensure it meet requirements of para 129,132 and 134 of NPPF.

Comments on amended proposals (31.08.2021)

- Do not wish to offer any detailed comments.
- Pleased to note that the alterations to the scheme to the north of Hall Lane broadly reflect the advice and concerns raised in our correspondence of March 2018
- Not necessary to be consulted on this application again unless there are material changes to the proposals.

Comments on amended proposals (02.03.2022)

- Not offering advice.
- Not necessary to be consulted on this application again unless there are material changes to the proposals

4.27 Environment Agency (EA)

Comments on originally submitted documents (21.03.2018)

- No objection to the proposals providing a condition is appended to any permission granted to ensure that Long Stratton Sewage Treatment Works will have sufficient capacity to prevent any deterioration of water quality as a result of this development.
- Long Stratton has been identified as an area with wastewater treatment concerns however, there is an agreement between EA and Anglian Water that there is capacity for the 1,800 houses.

Comments on amended proposals (16.07.2018):

- Anglian Water and the Environment Agency would not want to delay the first phases coming on stream, there is no argument that there is not sufficient capacity to treat these so it would be unreasonable to condition this.
- AW and EA consider that the first 3 phases of both the Western and Eastern development can commence without the need for a waste water treatment strategy (totalling 1045 dwellings). A condition has been suggested as follows:
“Apart from enabling works no development shall commence on phase D of the Eastern development and phase 4 of the Western development, until a wastewater treatment strategy, in consultation with Anglian Water and the Environment Agency, covering the remaining phases has been submitted and approved in writing by the Local Planning Authority.”
- Satisfied that the wastewater treatment condition suggested by Anglian water on 25.06.2018 would be sufficient to ensure that the development can begin without delay, but without causing the sewage treatment works to go over capacity and impact the water environment.

4.28 Highways England

Comments on originally submitted documents (23.02.2018)

- The Town And Country Planning (Development Affecting Trunk Roads) Direction 2018.

Comments on amended proposals (09.03.2018)

- Requires more information from developer regarding number of vehicles using A47/A140 junction.
- Issues:
- Traffic conditions at the A47/A40 junction are not consistent with a peak RFC of 0.61 in the 2015 base year
- ARCADY model has not been validated against observed queue lengths
- An assessment year of 2019 seems very early for the opening year of a site this size and appears to be no 10 year or end of local plan review period assessment as required by Circular 02/2013 (para 25).
- The ARCADY model of the A47/A140 roundabout has not been run with lane simulation
- The ARCADY model contains a number of entry and approach widths which appear excessive relative to the widths available
- How much of the traffic would be using the P&R at the A47/A140 and how much traffic will continue into Norwich on the A140?

Comments on amended proposals (27.04.2018)

- Holding Direction: recommends this application is not granted until 30 June 2018 or until a satisfactory response is received.

- Issues:
 - Details of the sustainable mode offer.
 - The discrepancy in the choice of PM peak hour
 - A more suitable Opening Year assessment (other than 2019) should be undertaken.
 - A more robust trip rate should be sourced for the B1 land use and used in the trip generation for this assessment
 - The traffic flows presented in diagrams TA07, 08, 17 and 18 of the TA should be amended as per the recommendations in Paras 5.1 and 5.9 of this note and reissued before being used in an updated set of junction capacity models.
 - Traffic flows used in the ARCADY models should be converted to PCUs either before being input into the ARCADY models, or within ARCADY itself;
 - Lane simulation should be used in ARCADY in the PM peak for the A47 slip road approaches.
 - The geometry of the A47 slip road approaches to the roundabout should be adjusted to exclude the metre strips and hatched areas which do not form part of the running lanes.
 - A formal assessment should be undertaken of the A140/ A47 slip roads against the traffic flow ranges shown in TD22 Table 3/1a and Figures 2/3AP and 2/5AP.

Comments on amended proposals (15.06.2018)

- Reiterates comments submitted dated 27.04.2018. Not all issues have been resolved

Comments on amended proposals (31.08.2018)

- Reiterates comments submitted dated 27.04.2018

Comments on amended proposals (15.01.2019)

- Information outstanding: previously raised a number of issues regarding the assessment of the transport impacts of this proposal on the A47 trunk road.
- Requested that this application is not granted until 15 February 2019.

Comments on amended proposals (13.02.2019)

- Information outstanding: previously raised a number of issues regarding the assessment of the transport impacts of this proposal on the A47 trunk road.
- Requested that this application is not granted until 30 April 2019.

Comments on amended proposals (30.04.2019)

- Reiterates comments submitted dated 27.04.2018

Comments on amended proposals (31.07.2019)

- Clarification on the current situation is outstanding: previously raised a number of issues regarding the assessment of the transport impacts of this proposal on the A47 trunk road.
- Requested that application is not determined before 27 November 2020.

Comments on amended proposals (29.11.2019)

- Currently reviewing the proposed highway measures which are required to mitigate the impact of the development on the A47 trunk road and to safeguard its performance in accordance with the requirements of the Highways Act 1980.
- Recommend the application be not determined before 3 January 2020.

Comments on amended proposals (23.12.2019)

- Clarification on the current situation is requested, so that the outstanding issues can be addressed - previously requested further information regarding the impact of the proposals on the A47 trunk road and in particular its junction with the A140. It is understood that this information has been depending until such times there is clarity with the development and delivery of the A140 Long Stratton Bypass.
- Requested that application is not determined before 27th March 2020

Comments on amended proposals (27.03.2020)

- Clarification on the current situation is requested, so that the outstanding issues can be addressed [as above]
- Requested that application is not determined before 28th May 2020.

Comments on amended proposals (28.08.2020)

- Clarification on the current situation is requested, so that the outstanding issues can be addressed [as above]
- Requested that application is not determined before 27 November 2020

Comments on amended proposals (27.11.2020)

- Planning application has been in abeyance for some time. Once advice is provided that the proposals are being taken forward, Highways England will review the current position of the likely impact of the development on the A47 trunk road with the aim of responding formally to the application.
- Suggests that the application is not determined before April 2021.

Comments on amended proposals (30.04.2021)

- Whilst this planning application has been in abeyance for some time, we are now in discussion with the application to resolve any matters relating to the impact of the proposed development on the operation of the A47/A140 junction.
- Requested that the application is not determined before 30 June 2021 to enable those discussions to be concluded.

Comments on amended proposals (30.06.2021)

- Understands that an updated TA is being finalised and is expected to be shared in the next few weeks.
- Requested that the application is not determined before 30 September 2021.

Comments on amended proposals (30.09.2021)

- Still waiting an updated TA. Without an opportunity to understand the impacts (if any) on the performance of the A47, we are not in a position to be able to respond to this consultation.
- Requested that the application is not determined before 25 November 2021

Comments on amended proposals (25.11.2021)

- TN02 highlights a number of major areas of concern in relation to the assessment undertaken on Harford Interchange, which includes a bus improvement scheme that is linked to the provision of the Long Stratton bypass and development. There was also a sub-standard merge noted on the westbound entry to the A47.
- Need time for the review to be completed by the applicant and matters to be addressed.
- Request that this application not be determined before 28/01/2022.

Comments on amended proposals (23.12.2021)

- Updated TA has been reviewed and accepted
- Recommend that conditions should be attached to any planning permission that may be granted
- It is agreed that the effect of the scheme on Harford Interchange is acceptable.
- The bus improvement scheme has no funding to be delivered in the short term, despite being in policy. However, even without the bus improvement scheme this application will have an acceptable impact on the junction.
- Harford Interchange: it is noted that there is a sub-standard merge on the westbound entry to the A47, however it is not deemed reasonable within the scale of this development to ask for mitigation to address this.
- Recommend Travel Plan Condition

Comments on amended proposals (02.02.2023)

- recommend that conditions should be attached to any planning permission that may be granted
- Planning application amendments are not considered to alter previous comments issued on 23 December 2021.

4.29 Anglian Water Services Ltd (AW)

Comments on originally submitted documents (13.03.2018)

- Assets Affected: Anglian Water would ask that the following text be included within your Notice should permission be granted. *“Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.”*
- Wastewater Treatment: Long Stratton Water Recycling Centre will have available capacity for these flows.
- Foul Sewerage Network: The sewerage system at present has available capacity for these flows.
- Surface Water Disposal: The proposed method of surface water management does not relate to Anglian Water operated assets
- The first 3 phases of both the Western and Eastern development can commence without the need for a waste water treatment strategy (totalling 1045 dwellings). This ties in with the EAs concern.
- Suggest a pre-commencement condition relating to a wastewater treatment strategy being submitted and approved.

Comments on amended proposals (01.09.2021)

- Assets Affected: As per previous consultation dated 13.03.2018
- Wastewater Treatment: Long Stratton Water Recycling Centre currently does not have capacity to treat the flows the development site. AW are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.
- Used water network: Development may lead to an unacceptable risk of flooding downstream. No objection subject to conditions being imposed requiring phasing plan and or on-site drainage strategy.
- Surface Water Disposal: Preferred method is SuDS, last option connection to sewer.

Comments on amended proposals (15.02.2022)

- Assets Affected: As per consultation comments dated 13.03.2018
- Wastewater Treatment: As per comments response dated 01.09.2021
- Used Water Network: The sewerage system at present has available capacity for these flows.
- Surface Water Disposal: As per previous comments dated 01.09.2021

Comments on amended proposals (21.02.2023)

- Assets Affected: The development site is within 15 metres of a sewage pumping station. This asset requires access for maintenance and will have sewerage infrastructure leading to it. For practical reasons therefore it cannot be easily relocated.
- Anglian Water consider that dwellings located within 15 metres of the pumping station would place them at risk of nuisance in the form of noise, odour or the general disruption from maintenance work caused by the normal operation of the pumping station.
- The site layout should take this into account and accommodate this infrastructure type through a necessary cordon sanitaire, through public space or highway infrastructure to ensure that no development within 15 metres from the boundary of a sewage pumping station if the development is potentially sensitive to noise or other disturbance or to ensure future amenity issues are not created.
- Wastewater Treatment: The site is served by Long Stratton WRC, the outfall for which discharges within the Natural England Nutrient Neutrality boundary.
- Used Water Network: The foul water and surface water strategy part 1: due to a lack of information. AW are unable to make an informed assessment. AW require site meeting with the developer to ensure phasing plans align with AW infrastructure. AW will require a full drainage strategy for the whole site.
- The development has the potential to have an unacceptable risk of flooding/or pollution from the network.
- AW request a condition requiring a phasing plan and on-site drainage strategy.
- Surface Water Disposal: The applicant has indicated on their application form that their method of surface water drainage is via SuDS. If the developer wishes Anglian Water to be the adopting body for all or part of the proposed SuDS scheme the Design and Construction Guidance must be followed. We would recommend the applicant contact us to re-consult us in line with their Surface Water strategy (part 1), at the earliest opportunity to discuss their SuDS design via a Pre-Design Strategic Assessment (PDSA).

4.30 Waveney Lower Yare & Lotingland IDB

- No comments received

4.31 Norfolk Rivers Internal Drainage Board (IDB) / Water Management Alliance

Comments on originally submitted documents (30.04.2018)

- Whilst the red line boundary of the site is just outside of our Internal Drainage District ("IDD"), we note that the intention (as stated in the Flood Risk Assessment) is to make 'discharges into the existing watercourses limited to
- Greenfield run-off rates'. A number of these discharges will in turn flow into the Norfolk Rivers Internal Drainage Board's IDD.
- Where a surface water discharge is proposed to a watercourse within the IDD (either directly or indirectly), land drainage consent is required in line with the Norfolk River Internal Drainage Board's byelaws (specifically byelaw 3).

Comments on amended proposals (26.10.2021)

- Recommend that the proposed strategy for any infiltration within residential areas of the development is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater.
- Land Drainage Consents will be required for the proposed discharge of surface water (Byelaw 3)

Comments on amended proposals (23.12.2021)

- The specific point raised by the LLFA regarding ongoing maintenance of SuDS infrastructure and ordinary watercourses: It remains the officers' opinion that although the Board may be in a position to take on the maintenance of some elements of the drainage infrastructure, questions remain outstanding relating to which legal mechanism could or should be utilised to support this (including an appropriate funding mechanism).
- These questions remain unresolved and require further exploration and confirmation (required primarily due to much of the site being outside of the Board's Internal Drainage District).
- If a legal mechanism were to be evidenced, a proposal would need to be presented to the Board for their consideration. As such, officers are not currently able to confirm that the Board would be able to take on maintenance of any infrastructure. However we would support a mandatory hierarchical approach to maintenance being required. This would likely start with a full and thorough exploration of the viability of the infrastructure being 'adopted' by a Risk Management Authority (including the Board) and may end with a Private Management Company.
- It remains likely that significant improvement works will be required to the receiving watercourses and wider network within the Board's IDD.

Comments on amended proposals (30.03.2022)

- Questions raised in letter dated 23/12/21 remain unresolved and still require further exploration.
- Due to the significant outstanding questions regarding whether an appropriate legal mechanism is available to facilitate the Board's involvement with any ongoing maintenance, the Board is unfortunately still not currently able to confirm that it is possible to 'take on' responsibility for any ongoing maintenance.

Comments on amended proposals (06.02.2023)

- No comments in addition to our letter of 30.02.2022

4.32 Sport England

Comments on originally submitted documents (19.02.2018)

- Objects
- Conflicts with Objective 3 - fails to make adequate provision for community indoor/outdoor sports provision to meet the demand generated by this development

Comments on amended proposals (15.09.2021)

- Objects
- Applications conflict with Objective 3 - fails to make adequate provision for community indoor sports provision to meet the demand generated by this development and will exacerbate the current situation of the leisure centre being full at peak times.
- Welcome further discussion on outdoor sport and how this can be provided to meet local needs.

Comments on amended proposals (20.02.2022)

- Neither object or support
- Further discussions will be needed to determine the scale, location and quantity of sports facilities to serve this development.
- Encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct CIL monies to deliver new and improved facilities for sport.
- Potential to consider the provision of a cricket facility within this development.
- Potential for the indoor/outdoor sports facilities to be provided within the primary school, to be made available for the local community
- Norfolk FA do not wish to make any additional comments to those previously submitted.
- The RFU do not wish to make any additional comments to those previously submitted, and they seek a financial contribution to help nearby rugby union clubs.
- The absence of an objection to this application cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.
- If planning consent is granted, the following conditions should be imposed on any grant of planning consent:
 - 1. *A requirement for a site survey and implementation plan for new sports pitches.*
 - 2. *A community use agreement to cover access to the primary school sports pitches and indoor hall.*

Comments on amended proposals (08.02.2023)

- Neither object or support
- Reiterates comments made in letter dated 20.02.2022

4.33 Norfolk Wildlife Trust (NWT)

Comments on originally submitted documents (29.03.2018)

- Impacts and mitigation: Tyrrell's Wood County Wildlife Site (CWS), New Plantation CWS and Pulham Market Big Wood SSSI should be considered as one site. We agree that recreational impacts on Fritton Common Site of Special Scientific Interest (SSSI) are not likely to be as severe as for woodland (ES:7.86), however, an element of mitigation is still required.
- Increased recreational impacts are also certain on Wood Green CWS. Mitigation will be required for this site and non-CWS commons to the east of the site.
- LS 'AAP: 5.21': this requirement should form part of any package of measures that is drawn up to mitigate for adverse impacts on these sites, owing to increased recreational usage
- Impact on species: A need to consider options for great crested newts within the development. Mitigation for impacts should be addressed within the outline planning application. We support the views of the NCC ecologist that impacts on farmland birds needs to be subject to mitigation and that compensatory nesting habitat will need to be provided; a significant portion of which will need to be created off-site
- With regard to creation of new areas of greenspace it would be good to see local species reflected in planting schemes

- Biodiversity enhancement in line with the NPPF: There is currently a good population of this species within the Long Stratton area and measures should be put in place to aid permeability through the new settlement. This should include ensuring that fencing provided by developers is designed with gaps to allow hedgehogs to pass through the landscape.
- Management of green spaces: Actions proposed within the LEMP should be subject to planning conditions.
- Concerns over who will take responsibility for management of Green Infrastructure (GI) and the mechanism by which management is funded. This should be resolved at the time of any planning approval. In our view it is important that some elements of the greenspace infrastructure are put in place as part of the early phases of the bypass and housing development and we would like to see mechanisms explored for enabling this to take place
- Fully support the proposals within the LSAAP for the development to incorporate “new commons” and pleased that this has been taken forward into the masterplan as areas of GI
- Zoning of areas of green space needs to be clearly addressed in the LEMP
- Pleased to see that detailed descriptions of management and management tasks are included in the LEMP and it is crucial that there is a mechanism to ensure that these actions take place.
- Some concern that a large amount of space will be taken up by SuDS in these areas.

Comments on amended proposals (17.09.2021)

- Failure to comply with planning policy and provide sufficient certainty over delivery of ecological mitigation and GI
- The most recent landscape masterplan provided with the application (Overall Landscape Masterplan, drawing 2020-398-113, dated September 2021) fails to include any areas identifiable as such, and we can also find no reference to these in the Landscape and Ecology Masterplan (dated May 2021)
- Whilst mitigation measures for impacts on species and habitats are proposed, we can find no evidence to demonstrate that a net gain would be delivered, in compliance with local planning policy. In order to meet this requirement, we recommend that additional evidence is provided (ideally measured against the most recent DEFRA metric) to demonstrate that a measurable net gain (i.e. at least 10%) can be delivered.
- The landscape masterplan fails to provide sufficient certainty on where the mitigation measures set out in the ecology report will be delivered, when they will be delivered and by whom.
- Strongly recommend that bridges across the bypass also includes a green bridge component alongside the human access, so that there are viable routes for wildlife to cross the bypass and maintain some ecological connectivity. We also seek clarification on the number of proposed culverts and underpasses for wildlife to maintain connectivity for populations of local protected species, in particular great crested newts.
- The rights of way plan appears to indicate that replacement rights of way will be delivered as part of the bypass development, but there are also a number of routes where delivery is attributed to later housing phases. Seek clarification that existing circular routes will be maintained through the construction phases of the development.
- Paragraphs 7.100 and 7.104 state that mitigation is necessary for public access impacts on Fritton Common SSSI and Fornsett Meadows SSSIs respectively. We cannot find any specific reference to what the mitigation for these impacts will be and seek clarification.

- The location of the southern roundabout in relation to the business part appears to have changed from earlier iterations and is situated some distance north of the E3 Employment Usage area set out in the Phasing and Delivery Statement.
- We recommend that landscaping proposals are reviewed in this area to ensure that Wood Green CWS is fully screened from the new roundabout.
- Recommend that further details are provided at this stage as to where responsibility lies for the monitoring and also the delivery of any remedial measures that monitoring may identify.
- Support the proposal to include wildlife nesting boxes on all new development, where appropriate, to provide additional opportunities for birds and bats.
- Whilst we have no objection in principle to the proposal, we seek clarification on several points to ensure compliance with planning policy and to ensure that the proposed mitigation and wider GI can be delivered successfully in relation to the multiple reserved matters applications that are expected to follow over the projected 17-year development period.

4.34 Campaign to Protect Rural England (CPRE)

Comments on originally submitted documents (20.03.2018)

- We see no reason why the bypass or its roundabouts should be lit. The residential streets in what is a low crime area should be subject to part-night lighting.
- Lighting in the southern employment/industrial zone also needs to be regulated, so that any unnecessary lighting is turned off when not needed, and is factored in as a planning condition.
- No mention in the ES chapter 6 of the Norfolk County Council Environmental Lighting Zones Policy. The countryside that surrounds Long Stratton, together with the villages and hamlets contained therein is classified as Rural Dark Landscape
- It is extremely important that these rural dark landscapes surrounding Long Stratton are protected from intrusive lighting from the proposed development.
- CPRE Norfolk would like to be fully engaged at an early stage in the planning process with respect to the lighting of this proposed development, and would welcome engagement with South Norfolk planners and the developers on this issue.
- Want to see the provision of safer crossing points for pedestrians and cyclists across the new bypass.
- The current plans would lead to the bypass being a physical and psychological barrier, both for residents wanting to walk and cycle out of Long Stratton to the East, and to residents of the smaller villages and hamlets to the East of Long Stratton wanting to walk and cycle into the town.
- It is claimed these are safe ways to cross, we feel this is not the case especially when compared to a footbridge. Also, walkers and cyclists would not want to contend with traffic on roads such as Parker's Lane, which is narrow and without a walkway. It is important to provide safe access to and from the countryside across the bypass, as supported by policy LNGS5 of the Long Stratton Area Action Plan.
- We suggest the addition of at least one bridge (or tunnel) for walkers and cyclists.
- Maximum attention needs to be given to the need to reduce traffic and road noise as much as possible.

Comments on amended proposals

- Environmental Statement (ES) dated May 2021 that: “There will be no lighting proposed on the bypass nor on the roundabouts (except illuminated signage..).” This is good news and we are thankful that this approach is to be followed.
- It is also good to note that the ES now includes a reference to the Norfolk County Council Environmental Lighting Zones Policy.
- Overall the chapter on lighting is a thorough piece of work and the visuals in Appendix 6.1 (Viewpoints) and Appendix 6.2 (Photo Viewpoints) are especially good at revealing the rural dark landscape characteristics of the area surrounding Long Stratton including the by-pass route – high quality aspects of the local environment very much worthy of protection.
- The rural dark skies and dark landscapes experienced in the countryside, villages and hamlets surrounding Long Stratton are very special features of South Norfolk.

4.35 NHS England

Comments on originally submitted documents (21.03.2018)

- Development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.
- Capital required through developer contribution would form a proportion of the required funding for the provision of additional capacity to the existing GP practice to absorb the patient growth generated and additional GPs.
- A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required from this development to be £482,576. Payment should be made before the development commences.
- Satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF
- Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development

Comments on amended proposals:

- No comments received.

4.36 Norfolk And Waveney Local Medical Council

- No comments received

4.37 South Norfolk Clinical Commissioning Group

- No comments received

4.38 Wood Green Residents Association

Comments on original proposals

- The proposed road is designed as a distributor road for the new housing – so that housing estates will have direct access onto the new road and use it to move around the village. This will urbanise the edge of Long Stratton and have a significant impact on the historic landscape east of Long Stratton.
- I believe that the Environmental Statement that supports the plan does not adequately address the impact of the roundabouts on the landscape or on light pollution, noise and air pollution.

- Existing public rights and all links will be severed by the new road.
- Without safe access across the new section of the A140, this will not be delivered and I support the call for a footbridge, potentially at Edges Lane and for safe crossing points, such as traffic islands, wherever footpaths cross the proposed new road.
- The Environmental Statement chapter on traffic looks at impact on footpaths and cyclists and concludes that there is no severance created by new road – clearly this is not the case and the Statement does not account for the importance of these routes to local people.
- As an example, the footbridge that carries Right Up Lane over the A11 at Wymondham/Silfield shows how a footbridge can maintain links across a new road and avoid severance. especially in the context of a new road and new urban area.
- Consider that the degree of severance from the village we will suffer has not been full addressed.
- Consider that the Southern Gateway area needs to be re-thought in terms of impact on the historic landscape, on lighting and on noise pollution.
- The Environmental Statement addresses the impacts of the proposed bypass rather than the impact of this zone, which could potentially consist of tall buildings that will not be adequately screened by trees and bunds.
- As these are in effect outline plans, there is no detailed assessment of the impact of this zone and no proposed restrictions on lighting, height of buildings, noise at evenings or weekends.
- The Long Stratton Area Action Plan sets out that the area east of Long Stratton is “vulnerable to the impact on the historic settlement pattern....and sensitive to the introduction of tall elements, which would be intrusive to the sense of openness”.
- A revised impact study looking at this zone is required, the roundabout closest to Wood Green needs to be reviewed, as it will have significant impacts in terms of lighting and noise on Wood Green and access at the south of the village needs to be re-thought.
- The rural area east of Long Stratton is recognised by the Campaign for the Protection of Rural England and by Norfolk County Council as a dark landscape.
- Although it is somewhat buried, the plans do propose lighting on the new road, at least on the roundabouts. This section of road, like most of the rest of the A140, does not need to be lit.
- Clearly and lighting impact on the dark skies area needs to be mitigated for in the plans.

Comments on amended proposals

- Overall, we think that the plans have improved greatly over time and we welcome the pedestrian crossing to the north and the multi-use bridge at Hall Lane. We note that there is an option for this to be a green bridge and suggest that this plan is made definite rather than optional.
- there are a number of matters that we wish to raise in connection to the plans and continue to object until these are resolved.
- We object to the location of the southern roundabout as being too close to the common at Wood Green and threatening to impact both the residents and the wildlife of this County (Local) Wildlife Site.

- We believe it fails to meet a number of simple standards given the increase in air, noise and potentially light pollution it is likely to create:
- Response refers to policies and guidance including Long Stratton East Sensitivity Zone as described in Norfolk County Council's Historic Characterisation and Sensitivity Assessment 2009; Policy DM1.4 in the Development Management Policies, South Norfolk Place Making Guide; Long Stratton Neighbourhood Plan, Policy LSNP – DC7; paragraph 174, Section 15 of the National Planning Policy Framework.
- We would like to see more information on the proposed screening of Wood Green from the bypass.
- At a meeting with South Norfolk early in the process, the Wood Green Residents Association were offered additional screening and bunds to stop light and noise pollution from traffic. However, it appears that these have not been included and there is a notable gap in the planting plans closest to Wood Green.
- We refer to the above policies, plans and guidance to underpin the need to protect both the character of the historic countryside and wildlife.
- We strongly oppose the proposed employment zone at the south of Long Stratton, which lies about 700m from Wood Green.
- The plans for this area are ill-defined, meaning it is not possible to comment on the details. We note that the existing employment areas of Long Stratton include 24 hour floodlighting, almost constant noise and frequently attract litter. None of these are acceptable in an area of open, historic countryside with a priority habitat (lowland grassland) at Wood Green. It is also not acceptable to impose this on a currently quiet rural community that is valued by many visitors as well as the residents.
- We refer to the NPPF, the AAP mentioned above and to policy DC7 of the Long Stratton Neighbourhood plan.
- Development proposals coming forward on the edge of the existing settlement shall design-in sensitive landscaping and lower densities to create an appropriate transition into the open countryside and avoid a hard perimeter to the edge of the settlement.
- To the east of Long Stratton, beyond the new settlement boundaries....key features of the ancient countryside as identified in Norfolk County Council's Historic Characterisation and Sensitivity Assessment will be protected including surviving historic greens, the lanes and the historic hedgerow boundaries;
- Landscaping schemes of individual development proposals need to be planned as an integral part of the development from the outset and implemented at an early stage of the build-out phase.
- We note the emphasis on planning early in the proposals and note that the lack of clarity on the employment zone conflicts with this.
- We note the provision of pedestrian/cycle access to the north of Long Stratton and at Hall Lane. We welcome these as a marked improvement on previous plans.
- However, there needs to be a footbridge to the south of the development to retain existing levels of access.
- At present many Long Stratton residents cross the A140 and use Parker's Lane as part of a circular walk or cycle ride back to the village, often branching out across Wood Green to the wider countryside.
- We consider that the public open spaces created as 'new commons' to the south of the proposed development are poorly designed for the needs of the town and its new housing.
- It is likely that as Long Stratton increases in size, the use of these areas could rise, unless there are adequate alternatives.

- We note that the Hall Lane Common area is partly SUDS and partly formal play areas, not leaving much space for the informal feel valued by residents. Formal areas would not fulfil the function of softening the boundary between the rural and urban areas.
- A re-design of this area to feel more like a rural common is suggested.

4.39 The Ramblers

- No comments received

4.40 First Bus

- No comments received

4.41 Sustrans

- No comments received

4.42 Wheels For Wellbeing

- No comments received

4.43 Diocese Of Norwich

- No comments received

4.44 Police Architectural Liaison Officer (PALO)

Comments on originally submitted documents (23.03.2018)

- No direct supporting reference as to how crime prevention measures have been incorporated into this major development
- Recommends that applicant fully embraces the principles of Crime Prevention through Environmental Design (CPTED) and security measures recommended in Secured by Design (SBD), Homes 2016 guidance, SBD, Commercial 2015 guidance for commercial development and SBD, New Schools 2014 guidance.
- Norfolk Homes Design Code provides detail as to front, rear & side boundary treatments where wall, railings and hedge maximums are proposed at 1.2m. Secured by Design, Homes 2016 guidance would recommend lower levels to deter criminals hiding behind such structures
- Recommend and encourage that gable end walls overlooking driveways /garages are specifically provided with beneficial active room window cover to reduce opportunity for graffiti damage and ASB
- Lengthy rear footpaths should be avoided. Beneficial protective lighting cover over such footpath gating is recommended and security measures should reflect SBD, Homes 2016 guidance.
- Recommend the applicant adopts SBD, New Schools 2014 guidance to assist with the development of the school and associated facilities
- Recommend garages be fitted with vehicle access doorsets which reflect LPS 1175 SR1 attack resistant standards
- No adverse comments regarding proposals for phase E2 and E3 employment areas

- Natural surveillance must include openness of aspect, vegetation kept distant from wide pathways and active rooms from nearby/overlooking properties.
- Parking is encouraged to be en-curtilage or in front of the owning property.
- Street furniture should be securely fixed and recreational seating be positioned in open areas
- Proposed community hub should include surveillance protection from active rooms within surrounding/overlooking dwellings
- Where interconnecting Type 6 roadways might serve the dwellings: suggest a review of such permeability and if possible split such roadways to create cul-de-sacs, closed to vehicles and pedestrian
- Encourage a review of the necessity for additional connecting footpaths and increased permeability
- Encourage the applicant to consider adopting the SBD, National Building Approval (NBA) designing out crime initiative
- No comments regarding bypass
- In terms of dwellings, welcome the fitting of vandal resistant 'dusk to dawn' sensor security lighting to cover external entrances and parking areas

Comments on amended proposals (23.08.2021)

- The previous comments submitted by my colleague, Dick Wolsey (March 2018) are still pertinent for the amended masterplan whilst acknowledging the relocation of primary school site/addition of sports pitches & revised open spaces. Further comments:
- If parking is to be provided for the sports pitches, that appropriate management and/or access control is considered to avoid misuse overnight or in quieter periods.
- To reiterate that residential communal parking areas should be in small groups, close and adjacent to homes and must be within view of the active rooms within these homes. The introduction of 'Street Square' parking is not recommended, especially when the development is a 'green field' site and therefore capable of providing a more secure design. Appropriate lighting would also need to be considered (BS 5489- 1:2020). There may also be confusion that this parking court could be used as an amenity space and encourage inappropriate activity around property that could lead to damage/dispute. Parking in squares maybe suitable for reaching shops/commercial units or supermarkets but not 'typical' layout for domestic parking facilities?

Comments on amended proposals (07.02.2022)

- Although nothing substantial to add to previous comments, I would like to promote the Secure By Design recommendations for Footpath Design in reference to the Sustainable Transport – Pedestrian and cycle movement (Section 5) in the revised Design Code.
- Public footpaths should not run to the rear of, and provide access to gardens, rear yards or dwellings as these have been proven to generate crime. Where a segregated footpath is unavoidable, for example a public right of way, an ancient field path or heritage route, designers should consider making the footpath a focus of the development and ensure that they are as straight as possible; wide; well lit; devoid of potential hiding places; overlooked by surrounding buildings and activities; well maintained so as to enable natural surveillance along the path and its borders. Where isolated footpaths are unavoidable, and where space permits, they should be at least 3 metres wide (SBD Homes 2019 Guide 8.8 – 8.12).

- With regards the Picton Gateway design principles as demonstrated within the Design Guide, to reiterate: Norfolk Police does not support rear parking courts due to criminal opportunity to commit crime unseen. Surveillance is normally provided only via bedroom windows which are not classified as 'active room
- This is a green field site and therefore has the capacity to design out poor parking facilities - there are expectations for the applicant to fully embrace the principles of Crime Prevention through Environmental Design (CPTED) for this development and security measures recommended in Secured by Design (SBD) guidance: Homes 2019 Guide, the principles and specifications

Comments on amended proposals (30.01.2023)

- Norfolk Police have no further comment to add.

Norfolk Police

Comments on amended proposals (28.09.2021)

- Further investment will be required to enhance provision and infrastructure
- Considered that a contribution of £50 per dwelling would be an appropriate level to be secure by s106 agreement (or CIL).

4.45 Norfolk Fire Service

No comments received

4.46 Open Space Society

Comments on originally submitted documents (21.06.2019)

- Detrimental and lasting adverse impact on the public's enjoyment of the Norfolk Countryside
- The quiet network of public paths to the east of the village will be dissected and disrupted by a proposed new bypass
- Adverse visual impact within the landscape
- Noise and pollution emitted by motor traffic
- Adequate improvements to the PROW network need to be expected by LPA

Comments on amended proposals:

- No comments received.

4.47 Norfolk Local Access Forum

Comments on amended proposals (09.02.2023)

- Fully endorses NCC March 2022 concerns.
- Refer to Appendix 4.1 Parameter Plans: Long Stratton Design Code, January 2022 [Revised January 2023]. Comparison of page 8 (showing the existing network of public rights of way) with page 29 showing the proposed routes clearly shows how the road as planned will significantly reduce the ability of people in Long Stratton to access the network to the east of the planned road. Request that the crossings of the proposed road are reconsidered to increase connectivity for all users.

4.48 Neighbour Representations (summarised)

A total of approx. 62 representations have been received, of which approx. 4 support the proposals and the approx. 27 object to the proposals. The remaining 30 public comments neither objected or supported but expressed various concerns with the proposed development. These relate to both the original and amended proposals and in some instances are from the same address as a result of re-consultation). The comments are summarised by topics as follows:

Highways

- Too many roundabouts
- Single carriageway as opposed to a dual carriageway
- Positioning of bypass and industrial estate
- Historical landscape impacts: Grade II listed buildings and particularly proximity to St Michael's Church and subsequent obstruction to access the church
- Road Safety
- Volume of traffic
- Congestion at Hall Lane Junction with Long Stratton High Street
- Visual landscape damage
- Loss of connection to Long Stratton with A140 acting as a barrier for residents to the East
- Noise Pollution
- Light Pollution on Dark Skies Area
- Air Pollution
- Brands Lane and property access risks
- No pedestrian/cycle provision crossing the bypass / no safe access to the countryside
- Northern roundabout at Church Lane: Noise and sound attenuation, air pollution, light pollution; vibration; Grade II listed building;

Commercial Zone

- Noise, light and air pollution
- Historic landscape impact on Grade II listed buildings particularly on St Michael's Church
- Consideration needs to be given to proper access to Tharston Industrial Estate

Community/Dwellings

- Two-storey housing overlooking existing gardens
- Design of housing seems threatening and unattractive
- Not enough provision of multi-use community facilities
- Loss of recuperative accessible countryside
- Loss of wildlife
- Upgrade of local amenities
- Building site in front of existing buildings for 5-6 years
- Increased flood risk and inadequate drainage systems concern following 2020 flooding event Star Lane
- Impact on historic Norfolk landscape
- Parking arrangements for new homes: provision of off road parking is required rather than street parking
- Star Lane is a dead end, narrow lane with no footpaths and no turning facilities for vehicles
- Loss of public footpaths: the east of the village 7 footpaths and 2 quiet lanes will be disrupted or shut down
- Concerns regarding the responsibility for the future efficient maintenance of all the drainage systems and SuDS

Support

- Long Stratton requires a bypass
- Bypass will bring significant improvement to the community

Neutral but have concerns:

- Why doesn't spine road connect at new northern roundabout?
- number of roundabouts
- Request that the existing A140 does not terminate at Wild Rose Farm and rather is left in place for an additional short distance further south to enable residents safe vehicular access on to a dead-end byroad not directly onto the main trunk road as is presently indicated.
- Safe cycle and pedestrian crossings of bypass needed, Footbridge or safe pedestrian crossing across the bypass from Edges Lane
- Weight limits on local roads
- Rat runs on narrow roads on the unclassified roads in Fritton, Shelton, Morningthorpe and Hardwick – speed restrictions of 40 mph on these roads
- Provision of bypass beneficial but negated by number of new homes and subsequent increase in vehicles
- Vehicular access to the new homes through Hill Farm estate
- Potential accidents on Star Lane given narrow road with no footpath either side – the detailed plans should include the culverting ditch and the provision of a footpath on the newly acquired section.

Community/Dwellings:

- Uncertainty over number of Affordable Homes
- Lack of protection from property speculators leading to high short-term rental properties.
- High dwelling densities for rural landscape
- No additional provision for elderly residents
- Concern over more housing being delivered but no bypass
- Strain on existing services - a need for community infrastructure (health facilities, public transport)
- Flooding of Star Lane - No indication as to who will have responsibility for the management of the lagoons and drainage ditches
- Some provision specific for Scouting and Girlguiding to provide opportunities for both young people and adults.
- More parking required in Long Stratton
- Water features – risk to life and require maintenance
- Wildlife: Nesting Skylarks and Yellowhammers next to Edges Lane and their declining population

5 Assessment

Principle

- 5.1 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. Material considerations include the National Planning Policy Framework (NPPF).
- 5.2 The site forms part of the land allocated for residential development and a bypass in the Long Stratton Area Action Plan (LSAAP) forming part of the Council's Development Plan. The LSAAP develops the principles established by the Joint Core Strategy, formulating a vision to see:

A revitalised large village based around its historic linear street pattern and Conservation Area, growing and building on its existing broad range of jobs and services into a thriving small town. The delivery of a bypass will enable a safer and more inviting town centre with increased shops and services and an enhanced Conservation Area.

- 5.3 The LSAAP includes a series of policies aimed to secure the vision for Long Stratton. The principal policy is Policy LNGS1 (Land East, South-East and North-West of Long Stratton), which states:

140.1 hectares of land is allocated for housing, employment, a bypass and associated infrastructure. This allocation will accommodate at least 1,800 new homes and 9.5 hectares of local employment opportunities as shown on the Policies Map. The Allocation will accommodate approximately 1,200 dwellings and 8 hectares of employment land to the east and south-east of Long Stratton with approximately 600 dwellings and 1.5 hectares of employment land to the north-west of Long Stratton.

- 5.4 The developer(s) of the Allocation will be required to ensure the delivery of the following:

Masterplan and Phasing Plan

The site must be comprehensively masterplanned as a whole, taking in to account all the requirements of this policy and comply with all of the following:

- Before any housing is permitted on this allocation there shall be a phasing and delivery mechanism that will secure the delivery of the bypass agreed with the Local Planning and Highway Authority;*
- Delivery of the bypass before the occupation of the 250th new dwelling in Long Stratton, unless clear evidence is provided to demonstrate that the occupation threshold is unviable and a variation to this threshold which meets the other requirements of the AAP and is acceptable in highways terms is agreed by the Local Planning Authority;*
- Delivery of a bypass within the identified corridor;*
- Link road between the A140 and Swan Lane to be delivered before the completion of the 200th dwelling in the north-west section of the allocation with no direct access to the A140 north of the bypass junction;*
- Delivery of a junction improvement at Hempnall Crossroads early in the development;*
- A phasing plan which clearly identifies where key infrastructure will be provided in relation to the provision of housing. Phasing must be designed to ensure development minimises disturbance to existing residents.*

Employment Opportunities and Economic Growth

The development will provide for a range of employment opportunities, as defined by use classes B1, B2 and B8 of the Use Classes Order, on a minimum area of 9.5 hectares. The phasing, design, size and location of the site(s) will be considered as an intrinsic part of the masterplan for the wider allocation in order to provide suitable, attractive and deliverable employment sites.

Development will be permitted where it will:

- Have direct access to the bypass (particularly for any uses generating significant volumes of traffic and/or HGV movements) or good access which does not conflict with existing or proposed housing;*
- Avoid vehicular access through the town centre;*
- Include appropriate design and landscaping, in particular where employment is located on land to the south-east or on an approach/gateway to Long Stratton;*
- Be designed to avoid and if necessary mitigate any potential conflict between employment uses and housing; and*
- Provide significant opportunities for local residents to walk and cycle to work.*

Enhanced Facilities

- Site to include an element of mixed-tenure Housing with Care;*
- Site to include an element of self-build if demand for such housing is demonstrated;*
- Provision of a serviced site of at least 2.0 hectares for a new two form entry primary school and 60 place pre-school (to be provided at no cost to the local authority/ies);*

Open Space and Green Infrastructure

- *Provision of open space, including children's play space and older children/adult open sufficient to meet the needs of residents of the development;*
- *Links between the village and the countryside to the east of the bypass corridor will be enhanced for the benefit of public access and to contribute to green infrastructure;*
- *Provision of a significant buffer to the Long Stratton Waste Water Recycling Centre to be utilised for green infrastructure.*

Design Principles

- *Design of development, including the bypass to recognise the need to sustain and improve the distinctive character of Long Stratton and to be of a scale and form which respects and enhances the Conservation Area;*
- *Design of the development, the bypass and green infrastructure provision to the east of Long Stratton to respect and reflect the key features identified in the Historic Landscape Characterisation and Sensitivity Assessment (Norfolk County Council, 2009);*
- *The bypass will be designed as an integral part of the wider development in order to achieve a high quality environment;*
- *Existing grid patterns of lanes to the east of Long Stratton will be retained within new developments and beyond.*

Transport

- *Proportionally contribute to the delivery of a junction improvement at Hempnall Crossroads;*
- *The bypass to function as a strategic road connection as part of the A140;*
- *Maximise pedestrian and cycle links between land to the east and The Street/Ipswich Road, including utilising routes through Churchfields, Edge's Lane, Star Lane and Hall Lane;*
- *Investigate and implement pedestrian and cycle links from the north-west via the Cygnet House site and St Michaels Road;*
- *New vehicular link between the centre of Long Stratton and allocation land to the east and strictly limited access from existing roads;*
- *Ensure the form of development maximises the opportunities for efficient and effective public transport services.*

Site Conditions and constraints

- *As a priority, a foul water strategy to be agreed with Anglian Water and the Environment Agency, regarding the nature and timing of capacity improvements and upgrades to the foul water public sewer network and Water Recycling Centre. No more than 1,000 dwellings occupied prior to written agreement with Anglian Water and the Environment Agency regarding solutions to current capacity constraints;*
- *Any potential risk of surface water flooding must be addressed/mitigated satisfactorily through an appropriate surface water drainage scheme agreed by the Environment Agency.*
- *Safeguarding provisions in the Norfolk Minerals and Waste Core Strategy Policy CS16 relating to investigation/prior extraction of resources will apply.*

Developer Contributions

- *Site to contribute to the delivery of infrastructure and facilities in Long Stratton through S106 (for on-site infrastructure) and the payment of CIL, including public transport enhancements within Long Stratton and on the A140 corridor, bus priority at the A140/A47 junction, environmental enhancements to the village centre, to support the development and any necessary social and community facilities and public open space."*

- 5.5 The site also forms part of the Long Stratton Neighbourhood Plan (LSNP) which was adopted in October 2021 which forms part of the Development Plan.
- 5.6 Before the assessment focuses on setting out how the scheme aligns with the requirements of the allocation officers would wish to clarify that for the purposes of this site allocation, it is noted that an area of land is excluded from the application comprising 18.4 Hectare of land on the eastern side between Hall Lane and Parker's Lane to be retained as agricultural land, identified as White Land on the masterplan.
- 5.7 A further area comprising 4.6 hectares is also excluded from the west application ref 2018/0112 (the other item to be considered on this agenda).
- 5.8 Notwithstanding these excluded areas, the planning applications submitted propose to deliver the requirements of the site allocation in terms of the quantum of development with 600 dwellings on the western part of the allocation and 1,275 dwellings on the eastern part of the allocation, each together with the requisite employment land, the bypass and associated infrastructure.
- 5.9 The combined area of this planning application and application ref 2018/0112 amounts to approximately 172.5 hectares (including on and off-site landscaping and other accommodation works). This is more than the site allocation of 140.1 hectares and is partly due to a difference in the wording of LNGS1 and the Policies Map at Appendix 2 to the LSAAP where the Policies Map identifies more land than 140.1 hectares. The reason for this is that the original draft allocation envisaged the whole of the development being delivered on the eastern part of the allocation. However, when the western part of the allocation was included in the final allocation, the amount of development land on the west continued to state to be of a size (in hectares) as originally drafted. As such more land is allocated for development than stated in the policy wording. Despite this it is considered that the policy text should take precedence and that the quantum of development being proposed is therefore in accordance with the allocation.
- 5.10 In recognising this and to ensure that the proposed development can be designed in such a way as to ensure that any future development of the white land can be successfully integrated with it, an indicative masterplan has been provided to illustrate how the white land could potentially be developed and how it could be integrated successfully with the development for which planning permission is sought. On this basis, whilst it would be preferable for the white land to form part of this planning application, the provision of an indicative masterplan is considered an acceptable approach to show how the remainder of the allocation could potentially come forward and be integrated into this development should this come forward at a later date. This application would be subject to a separate planning application and determined on its own merits in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, taking account all of the material considerations relevant at that time and any necessary planning obligations, including infrastructure capacity and delivery as well as any conflict with the limit on dwellings numbers.
- 5.11 Notwithstanding the above, in assessing the proposed development, it is necessary to note the fact that the Council currently has less than 5 years of deliverable sites, when having regard to the temporary impact of Nutrient Neutrality. This will be concluded at the end of this report in respect to any other material considerations and relevant policies.
- 5.12 Turning back to the allocation, the assessment will now address each section in turn and extracts are duplicated below for ease of reference.

Masterplan and Phasing Plan

- 5.13 This section within the allocation has the following requirements:

The site must be comprehensively masterplanned as a whole, taking in to account all the requirements of this policy and comply with all of the following:

- Before any housing is permitted on this allocation there shall be a phasing and delivery mechanism that will secure the delivery of the bypass agreed with the Local Planning and Highway Authority;*
- Delivery of the bypass before the occupation of the 250th new dwelling in Long Stratton, unless clear evidence is provided to demonstrate that the occupation threshold is unviable and a variation to this threshold which meets the other requirements of the AAP and is acceptable in highways terms is agreed by the Local Planning Authority;*
- Delivery of a bypass within the identified corridor;*
- Link road between the A140 and Swan Lane to be delivered before the completion of the 200th dwelling in the north-west section of the allocation with no direct access to the A140 north of the bypass junction;*
- Delivery of a junction improvement at Hempnall Crossroads early in the development;*
- A phasing plan which clearly identifies where key infrastructure will be provided in relation to the provision of housing. Phasing must be designed to ensure development minimises disturbance to existing residents.*

- 5.14 Officers have been in negotiations over an extended period of time to develop a comprehensive masterplan for the site and in particular to understand how the bypass can be delivered.
- 5.15 With regard to the bypass, following the submission of this application in 2018, extensive discussions have taken place with Norfolk County Council who have taken forward the design of the bypass as part of preparations to secure funding from the Department for Transport (DfT) for the delivery of the bypass. The detailed bypass design forms part of this planning application and is proposed to be delivered by Norfolk County Council as shown on the illustrative masterplan and associated detailed bypass plans.
- 5.16 The proposed bypass scheme is proposed to be funded by contributions from both Central Government and local contributions. The Department for Transport has committed to funding £26.1m (subject to submission of a successful Full Business Case). Local contributions have been sought from both the developer and Greater Norwich Growth Board (GNGB). The developer has committed to £4.5m, alongside £10m from GNGB funded through Community Infrastructure Levy (CIL). The remainder of the £46.23m cost estimate will be underwritten by NCC until the remaining local contributions have been confirmed. Therefore notwithstanding the intention of the LSAAP that 'a substantive element of funding is expected to come from the developer', on the basis that public sector funding has been identified that enables the bypass to come forward with the Developer contribution identified, the developer contribution in this respect is considered acceptable.
- 5.17 The proposed scheme is programmed to commence in April 2024, subject to the necessary approvals and planning permission being granted, and currently has a construction duration of 18 months. A condition is proposed to allow for up to 250 homes to be occupied prior to the completion of the bypass in accordance with the triggers of the allocation.
- 5.18 As part of the bypass design a number of changes have been made throughout the course of this application, including changes to its alignment and removal of the roundabout access at Hall Lane and replacement with a bridge.

- 5.19 Access to the development is proposed via the new bypass which will traverse the eastern development areas connecting at the north by a roundabout junction with a new link road to the west of the A140, and a priority junction connecting to the A140 to the south. The bypass comprises of the following key connections:
- Northern Roundabout – 4 arm roundabout with the A140 providing access to the western link road and to the bypass, including a new bridge to maintain access to Hall Lane crossing the bypass, including walking facilities provided as part of the Hall Lane overbridge;
 - Central Roundabout – Three arm roundabout with the bypass providing access to development;
 - Southern Roundabout – three arm roundabout between the bypass and new return connection to the existing A140 to the north of Parkers Lane. The existing A140 is to form the minor arm of a priority controlled T-junction.
 - Pedestrian/cycling overbridges on the line of Footpath 7 which links the rear of the Churchfields Estate (and the main part of Long Stratton settlement) with the church of Stratton St Michael;
 - At grade crossing facilities for pedestrians and cyclists, at all of the proposed roundabouts on the bypass.
- 5.20 The application also includes diversions and/or stopping to PRowS proposed by Norfolk County Council, including Restricted Byway/No Through Road provisions to the A140, and Parkers Lane and Edges Lane.
- 5.21 Other matters related to transport will be addressed in a later section of the assessment.
- 5.22 In terms of the delivery of a junction improvement at Hempnall Crossroads, this is no longer required due to the introduction of a new roundabout which is fully operational, and as such is not required as part of the development proposals.
- 5.23 With regard to the need to secure a phasing plan indicating key infrastructure, while documents submitted in support of the application set out the proposed phasing of development parcels, they do not clearly set out the phasing of the infrastructure necessary to support the development as it comes forward, A condition is therefore recommended to be imposed on any permission requiring an infrastructure phasing plan to be submitted and approved prior to the commencement of development of the non-bypass elements of the development setting out infrastructure delivery across the development to ensure development minimises disturbance to existing and new residents and that infrastructure to support the development is delivered at acceptable triggers.
- 5.24 In summary, officers are satisfied that the six requirements of the “Masterplan and Phasing Plan” section of the allocation have been met by this application.

Employment Opportunities and Economic Growth

- 5.25 This section within the allocation has the following requirements:

The development will provide for a range of employment opportunities, as defined by use classes B1, B2 and B8 of the Use Classes Order, on a minimum area of 9.5 hectares. The phasing, design, size and location of the site(s) will be considered as an intrinsic part of the masterplan for the wider allocation in order to provide suitable, attractive and deliverable employment sites. Development will be permitted where it will:

- *Have direct access to the bypass (particularly for any uses generating significant volumes of traffic and/or HGV movements) or good access which does not conflict with existing or proposed housing;*
- *Avoid vehicular access through the town centre;*
- *Include appropriate design and landscaping, in particular where employment is located on land to the south-east or on an approach/gateway to Long Stratton;*
- *Be designed to avoid and if necessary mitigate any potential conflict between employment uses and housing; and*
- *Provide significant opportunities for local residents to walk and cycle to work.*

- 5.26 The application proposes 8 hectares of employment land for uses within Classes B1, B2 and B8. A further 1.5 hectares of Class B1 employment land is proposed as part of the west application ref 2018/0112. Thereby providing a total amount of employment land which complies with the minimum identified in the allocation for a range of employment opportunities as required by the LSAAP.
- 5.27 With regards to the locational requirements of the employment area, this is set out in the masterplan as Phase E2, which is located to the south of Long Stratton and Parkers Lane, to the rear of an existing scaffolding yard and a further area identified on the masterplan as E3 to the south west of the site.
- 5.28 The location has been determined by the proposed access strategy and Policy LNGS1 to allow for the creation of a landscaped and a commercial 'gateway' to the southern part of the bypass/town as detailed in the landscape masterplan and required by Policy LNGS1. Further details of landscaping will be assessed at the reserved matters stage based on the principles of the landscape masterplan and submitted design code, to ensure that the proposals achieve a landscaping commercial gateway to Long Stratton as required by the LSAAP.
- 5.29 Access is proposed from the bypass (via a roundabout) by HGVs, etc to/from the bypass and also from the stopped-up section of the A140 via a newly constructed T-junction. The stopped-up section of the A140 is proposed to form the minor arm of a priority-controlled T Junction with the returning link providing the principal access to the employment land from the bypass to avoid vehicular access through the town centre and thus avoiding conflicts/traffic/amenity issues (including avoiding the Town Centre). HGV access to the High Street will be controlled through suitable signage/management as part of the detailed highways conditions.
- 5.30 Regarding the need to avoid any potential conflict between employment uses and housing, the mixed-use employment areas are generally well separated from housing to minimise potential issues arising with regards to residential amenity between housing (existing and proposed) and employment uses, whilst being readily linked/accessible to/from it, including by means of other than the car. However, it is noted that some existing properties could be impacted by the proposals. As such, reserved matters will need be designed to avoid, and if necessary, mitigate any potential conflict between employment uses and housing; to ensure that all impacts are fully assessed and mitigated. Conditions are also recommended requiring a noise assessment to be submitted concurrently with future reserved matters application to ensure appropriate mitigation is identified and implemented.
- 5.31 Phasing and detailed design of the employment land development will be governed by future reserved matters submissions, which will need to have regard to the submitted masterplan and design code principles. Whilst the LSAAP does not make a specific requirement in terms when employment land will be needed in Long Stratton, it recognises that new employment opportunities and the delivery of this employment land is necessary to ensure the long term sustainability of Long Stratton. The servicing of the employment land at an early stage will therefore be important to maximise the opportunities of this coming forward to support the housing growth. The marketing and delivery of the employment land is secured by condition to be agreed by the Local Planning Authority to ensure it comes forward at an appropriate time and that it is delivered alongside the housing proposals and infrastructure phasing plan.

- 5.32 In terms of connectivity between the employment land and residents, a footway/cycleway is proposed along one side of the bypass linking it with the residential phases of development and routes into Long Stratton centre via Hall Lane, Star Lane and Edge's Lane. A network of pedestrian and cycle routes is also proposed as part of the masterplan which provide links and connectivity throughout the scheme. Officers consider that the most desirable route for existing residents of Long Stratton and equally residents of the proposed development to the west of the A140, to access the new employment areas, would be along the A140 due to the closure of the road at the southern end to traffic. Enhancements to this route are proposed as part of the wider package of offsite highway improvements, which are set out in the next section of this report.
- 5.33 As such, when having regard to the masterplan, which identifies 8 hectares of employment land to the south-east of Long Stratton (E2 and E3) and 1.5 hectares to the south west (E1), it is considered that the planning application provides sufficient certainty that the development can provide for a range of employment opportunities as well as meeting the objectives set out in Policy LNGS1 subject to appropriate triggers for the submission of reserved matters for the site and provision of the land as serviced employment land. To ensure the reserved matters come forward on the employment site in a planned and coordinated way and that the relationship between the proposed employment land and existing dwellings is respected, a condition is recommended requiring parameter plans to be submitted concurrently with the first reserved matters for the E3 and E2 employment areas.
- 5.34 On the basis of the above, officers consider that the aims of the section of the allocation relating to employment have been met.

Enhanced Facilities

- 5.35 This section within the allocation has the following requirements:
- *Site to include an element of mixed-tenure Housing with Care;*
 - *Site to include an element of self-build if demand for such housing is demonstrated;*
 - *Provision of a serviced site of at least 2.0 hectares for a new two form entry primary school and 60 place pre-school (to be provided at no cost to the local authority/ies);*
- 5.36 In terms of the requirements of the LSAAP to provide an element of self-build (if demand for such housing is demonstrated), given the outline nature of the application it is considered that the application and masterplan is sufficiently flexible that self-build housing can be provided either within the wider site allocation or at the detailed application stages should this be required as part of the housing mix and demand at the time. Current demand for self-build dwellings in South Norfolk suggests that there is a demand for such dwellings and as such this will need to be considered as part of future reserved matters applications. It is recommended that this is included in the S106 and a scheme is submitted concurrently with each reserved matters as part of the housing mix to include self-build housing should demand be demonstrated.
- 5.37 With regards to mixed-tenure Housing with Care, there is an ongoing need for such accommodation as identified in Policy LNGS1. The Policy requires an element of mixed tenure Housing with Care to be provided within the development. The current masterplan provides no provision for this however the applicant has not sought to demonstrate that this is not needed in terms of housing need, that it would impact viability, nor that it would not be deliverable. On the basis of the ongoing demonstrable need for Housing with Care a condition is recommended, requiring a Housing with Care scheme to be submitted to and approved by the Local Planning Authority prior to the commencement of any dwelling on any phase setting out how this will be secured, its location within an identified residential phase as well as a timetable for delivery within the relevant phase it is located.
- 5.38 In terms of future capacity of educational facilities within the local area, which include primary and high schools, NCC Education have reviewed the proposals and has confirmed that there would currently be insufficient places available at local schools to accommodate the children arising from this development.

- 5.39 To mitigate this impact, the application proposes the free transfer of land for a serviced 2 hectare primary school site to be made available by the developer to Norfolk County Council prior to the occupation of no more 150 dwellings on the eastern site to accommodate the children from this development and also from the other planning application to the west (2018/0112).
- 5.40 Following discussions between the applicant and NCC Education, the location of the school site (plus potential expansion land of 0.5 hectares) and the trigger for the transfer of the land on occupation of 150 dwellings on the eastern site has been agreed which will be secured by the S106.
- 5.41 The costs of constructing the school will be met through CIL funding relating to the two applications. CIL funding would also be required to support additional places in the Early Education sector and at Long Stratton High School to contribute towards the expansion and improvement of existing facilities.
- 5.42 The proposed development will also lead to increased pressures on a range of other community venues including libraries, community meeting space and leisure provision.
- 5.43 Policy R20 of the Long Stratton Neighbourhood Plan (LSNP) supports the provision of a new town hall or community meeting space. The Neighbourhood Plan requires the community space to be centrally located and accessible in terms of public transport and walking and cycling routes, as well as being capable of providing overflow town-centre parking and off-street parking. Furthermore, Policy SC6 of the LSNP supports new community facilities, where they can easily be accessed by the communities they are intended to serve.
- 5.44 The masterplan identifies a new site (CH1) for the provision of a community space located to the north of Star Lane to be offered to the Town Council free of charge. The location of the community hub was originally located to the south of Star Lane as required by the LSNP. However, following changes to the bypass design, the location has been amended to allow direct access to the site from the roundabout and to enable the site to come forward at an earlier stage than previously anticipated.
- 5.45 Whilst some minor conflict with the Neighbourhood Plan is identified in terms of the revised location of the site, it is considered, having discussed the proposals with the Town Council, that given the community hub is well connected to the wider community and closer to the Town Centre than originally proposed, that the proposals meet the general objectives of LSNP R20 and SC6.
- 5.46 The application does not propose to construct the community space, it proposes to provide serviced land to the Town Council via the S106 agreement. This is primarily on the basis that the development does not result in the loss of the present facilities within the town and that the development would deliver significant CIL funds to the Town Council (they would receive 25% of the total CIL funds for the development) which could be used to deliver the scheme and associated infrastructure to address the additional demands that the development places on the local area.
- 5.47 In terms of the design of the building and the provision of off-street and town-centre parking, these matters will be dealt with at the reserved matters stage as part of the detailed design of the community hub.
- 5.48 A further area of community land is identified to the west of the development under application ref 20180112 (CH2), which comprises of open space and recreation space required as part of the Council's Open Space SPD.
- 5.49 Turning to other leisure provision i.e., swimming pools and sports hall courts etc, there is no requirement in the LSAAP to provide an indoor sports facility. However, it is noted that LSNP supports the provision of a new swimming pool facility but does not indicate where or how.

- 5.50 These requirements could be met through the expansion/improvement of existing local facilities. Furthermore, indoor sports and/or off-site sports provision are included in South Norfolk's published Annual Infrastructure Statement 2019-2020, which identifies the expansion of new and enhanced facilities in Long Stratton.
- 5.51 As such and based on the scale of the residential development and recent investment in additional facilities at Long Stratton Leisure Centre, it is considered that the increased demand from the proposed development on leisure provision, can be adequately catered for through the provision of the above enhanced facilities.
- 5.52 With regard to existing library facilities, the increased demand is to be met by the expansion of the existing Long Stratton library by funding through the Community Infrastructure Levy (CIL).
- 5.53 Subject to the above being secured through a combination of the S106 and CIL funding, the impacts of the development in terms of the enhanced facilities identified in the allocation are adequately met.
- 5.54 In terms of Environmental impacts as assessed in the submitted ES, an assessment of the likely significant environmental effects arising from the proposals in relation to socio-economic issue has been undertaken. This has included an assessment of the potential impacts in terms of housing and employment, along with impacts upon social infrastructure including schools, health, leisure, community facilities and public open space provisions.
- 5.55 The proposed development will have a number of potential positive impacts, including through the provision of new market and affordable homes as set out further below, whilst the provision of employment generating land uses will have economic and employment benefits. However, the delivery of this new housing will lead to an increase in the population, which will in turn have impacts, both positive and negative, on social and community infrastructure including school and health care provision, and that will require mitigation.
- 5.56 The potential likely significant adverse impacts that have been identified, prior to mitigation, cover: education; health services; community facilities and public open space. In response to this, the measures as set out in this report which directly respond to these potential adverse impacts which ensure that the development does not have a negative impact.

Open Space and Green Infrastructure

- 5.57 This section within the allocation has the following requirements:
- *Provision of open space, including children's play space and older children/adult open sufficient to meet the needs of residents of the development;*
 - *Links between the village and the countryside to the east of the bypass corridor will be enhanced for the benefit of public access and to contribute to green infrastructure;*
 - *Provision of a significant buffer to the Long Stratton Waste Water Recycling Centre to be utilised for green infrastructure.*
- 5.58 With regard to open space, Policy DM3.15 requires new housing development to provide adequate outdoor play facilities and recreational open space commensurate with the level of development proposed in order to meet the need of occupants and this is informed by the Council's adopted Open Space SPD which provides the standards for open space provision as well as the minimum amounts of recreational open space and play facilities to be provided. Policy GI16 of the LSNP sets out standards for recreational open space in accordance with the requirements of Council's Open Space and Policy GI17 sets out the priorities for delivering Green Infrastructure.

- 5.59 The application proposes children's and adult play and recreation facilities in accordance with the Council's adopted standards, plus areas of additional space such as strategic landscape and buffers etc. This equates to a minimum requirement of approx. 14.45 hectares of recreational open space on the site.
- 5.60 The submitted landscape masterplan, design code and open space plan, illustrate how these areas are distributed, how they are linked, how they could be laid out and accommodated on site by providing both formal and informal open space, children's play areas, green corridors (linear park) and natural/semi-natural areas (ecological networks). These form part of the landscape-led approach to the proposed development, providing scope to deliver high quality green infrastructure alongside the built development.
- 5.61 These spaces comprise of the following key components:
- Northern Gateway (formal landscaping with a large 'gateway green' and circular clumps of trees positioned as 'gateway markers' at the entrance to the village);
 - Eastern Linear Park (a green buffer and bunding along the new bypass); also comprising a cycle/footpath along the bypass corridor and links connecting with existing Public Rights of Way between the village and the countryside to the east of the bypass;
 - Star Lane Common (interlinked attenuation lagoons, cut into the shallow valley slopes alongside Star Lane providing an interface between this area and the Eastern Linear Park, comprising dry meadows, hedged pathways and woodland);
 - Hall Lane Common (SuDS lagoons comprising of multifunctional open spaces, with shallow meadow slopes, including SuDS features and formal open space i.e. sports pitches and formal play).
 - Tertiary landscape structures (neighbourhood ponds, verges, street tree planting and any other incidental open spaces within the development.)
- 5.62 In terms of how the open space will be delivered, the timing of this will be secured by the S106. Officers consider that some elements of open space where they straddle phases and deliver key joined up pieces of green infrastructure may need to be delivered as one entity. The provision of open space and timing of delivery will be secured by the Open Space Plan and detailed in the S106 as part of the detailed open space schemes for each reserved matters, to ensure it comes forward at the appropriate stage.
- 5.63 With regard to the location of the formal recreation space, which could accommodate football pitches and formal play space, these are shown to the north of Hall Lane and in the eastern part of Hall Lane Common. The location has been determined by the topography of the site, being the only large and relatively flat area of land available and accounts for most of the formal open space required for the development. The remainder of the formal open space provision as required by Policy will be provided as part of future phases of development in accordance with the Council's Open Space Supplementary Planning Document (DPD), secured by condition and the S106.
- 5.64 Concerns have been raised by the Town Council with regards to the proximity of the pitches to the bypass and to the main spine road running through the development. It is noted that the pitches would be separated from the bypass by a landscape buffer, including a cycle path and service margins along the bypass which would in effect provide a significant margin between the bypass and the pitches. With regard to the spine road, which separates the pitches from the west of the development and school site, the pitches would be accessible by a short walk across the spine road which will be subject to a 20mph speed limit. Having regard to this and any extra safety measures that may be deemed necessary (for example a crossing over the spine road), which would be subject to reserved matters applications, these elements of the scheme are considered acceptable, subject to further detail being provided at the appropriate stage should this be necessary.

- 5.65 Regarding future maintenance and management of all policy compliant open space, a financial contribution is being proposed (to be included in the S106) to meet capital and maintenance costs in accordance with the Council's adopted SPD.
- 5.66 In terms of any additional space such as strategic landscape, attenuation lagoons, wetland SuDs features, woodlands, and other Green Infrastructure, which is at a quantum above the open space SPD but none the less otherwise necessary to make the development acceptable in planning terms, no further maintenance contribution is being proposed beyond what is required to meet the required open space adopted SPD standard. The cost of maintaining these additional areas is proposed to be met by a management company.
- 5.67 In terms of who will be responsible for the management of recreational open space, whilst the Council cannot ultimately dictate who adopts it, it is the Council's preference that the policy compliant open spaces be adopted by the Town Council or an appropriate community association for the lifetime of the development along with a commuted sum. On this basis and inline with the open space SPD a cascade is proposed to be included in the S106 requiring all policy compliant open space be offered to the Town Council in the first instance along with a financial contribution calculated in accordance with the Council's open space standards. In the event that the Town Council or a community association or similar body do not wish to adopt the land, the developer will either then retain it or pass it to a management company.
- 5.68 With regard to the landscaping associated with the bypass corridor and associated buffers and planting, it is anticipated that it will be adopted and managed in perpetuity by Norfolk County Council as part of the highway. Details of management regime associated with these spaces are set out in the submitted LEMP which will be secured by condition. Additional land to the east of the bypass is proposed to be managed by the existing landowner. No maintenance contribution is proposed for the additional space and landscape buffers, above what is required by the Council's SPD to make the development acceptable.
- 5.69 Members should note that the Town Council have indicated that they would like to take on the recreational open spaces, except for drainage features and other elements relating to the bypass and strategic landscaping which will ultimately be adopted and managed by others. As such and subject to an appropriately worded clause in the S106 to enable the transfer of any elected open space to the relevant body, the proposals are considered acceptable regarding the amount and types of open space and future maintenance and management options.
- 5.70 A Landscape and Ecological Management Plan (LEMP) has also been submitted as part of the application setting out the overarching principles for landscape management that will apply to the whole of the new development. Precise details for the management of the residential development will be conditioned as part of the detailed planning applications, and at this stage the only detailed proposals relating to landscape and ecological management are for the bypass corridor.
- 5.71 Taking the above into account, it is considered that the proposals meet the requirements of the allocation, Policy DM3.15 of the SNLP and LSNP in terms of the requirements for recreational open space and GI16 of the LSNP.
- 5.72 In terms of Green Infrastructure, this is also assessed in further detail in the Ecology section of this report.

Design Principles

5.73 This section of the allocation requires the following:

- *Design of development, including the bypass to recognise the need to sustain and improve the distinctive character of Long Stratton and to be of a scale and form which respects and enhances the Conservation Area;*
- *Design of the development, the bypass and green infrastructure provision to the east of Long Stratton to respect and reflect the key features identified in the Historic Landscape Characterisation and Sensitivity Assessment (Norfolk County Council, 2009);*
- *The bypass will be designed as an integral part of the wider development in order to achieve a high quality environment;*
- *Existing grid patterns of lanes to the east of Long Stratton will be retained within new developments and beyond.*

5.74 In addition to this section of the allocation, Policy 2 of the JCS and Policy DM3.8 of the Local Plan require new development to be of a high standard of design. Policy LNGS1 sets out the design principles of the development, including the bypass, in order to achieve a high quality environment. Policy DC8 and DC10 of the LSNP are also relevant and sets out the design and character policies for Long Stratton.

5.75 In response to comments received from the Council's Senior Heritage and Design Officer, the Town Council and other consultees, the applicant has amended and updated the planning application, including the Design Code.

5.76 Further information has been provided regarding understanding the local context and recognising the value of innovative and sustainable design. Reference is also made to the South-Norfolk Place-Making Guide (2012) and the Long Stratton Design Guide (2020), which is intended to help inform the design of the development in conjunction with the Design Code, including the use of locally distinctive materials to provide a sense of place.

5.77 In terms of the content of the code, the document sets out the guiding principles and a range of design parameters and rules to ensure a high quality development, whilst allowing some flexibility as long as design quality is retained.

5.78 The code is based on a landscape-led approach and sets out how a hierarchy of green spaces will provide different character types across the site responding to the existing landscape structure. These structures comprise of Primary Landscapes, including an Eastern Linear Park green buffer and bunding along the new bypass; Secondary Landscapes, including open space within the site, sports pitches and sustainable drainage systems, and Tertiary Landscapes, including neighbourhood ponds, verges, street tree planting and any other incidental open spaces within the development. Information is also provided regarding green infrastructure, pedestrian and cycle movement and sustainable drainage.

5.79 In addition, the code identifies a number of character areas, which set out the detailed design requirements of the development for building density, scale and height, as well as the design principles relating to each of the character areas. The section also contains information on street types, parking, building design and materials, and hard landscaping.

5.80 Following changes to the masterplan and Design Code, officers are now satisfied that the submitted information is acceptable and will ensure that subsequent phases of development will achieve an acceptable standard of design that reflects and relates well to each other meeting the design objectives of the LSAAP and LSNP.

- 5.81 A condition is proposed requiring the completion of a design code compliance statement to support and inform all reserved matters to show that applicants have applied the codes to their detailed designs or provided a higher standard of design. Applicants will also be expected to demonstrate how their proposals comply with the South-Norfolk Place-Making Guide (2012) and the Long Stratton Design Guide (2020).
- 5.82 The masterplan and design code is based on the design principles set out in the Long Stratton Neighbourhood Plan Design Guidelines in relation to strengthening and enhancing Long Stratton's historic core; integration with the bypass; pedestrian and cycle connectivity; edge treatments between the proposed and existing settlements; road types and vehicle access; vehicle parking; built form, including architectural details and material palette; and sustainability.
- 5.83 In summary, the resultant masterplan and design code is considered to be an acceptable approach to developing the site as required by this section of the allocation and also complies with Policy DM3.8, Policy LNGS1 and the LSNP. Furthermore, the detailed elements of the bypass proposals are considered acceptable in respect to design.

Transport

- 5.84 This section within the allocation has the following requirements:
- *Proportionally contribute to the delivery of a junction improvement at Hempnall Crossroads;*
 - *The bypass to function as a strategic road connection as part of the A140;*
 - *Maximise pedestrian and cycle links between land to the east and The Street/Ipswich Road, including utilising routes through Churchfields, Edge's Lane, Star Lane and Hall Lane;*
 - *Investigate and implement pedestrian and cycle links from the north-west via the Cygnet House site and St Michaels Road;*
 - *New vehicular link between the centre of Long Stratton and allocation land to the east and strictly limited access from existing roads;*
 - *Ensure the form of development maximises the opportunities for efficient and effective public transport services.*
- 5.85 Beyond securing details of the bypass, as outlined earlier in the assessment, in respect of other transport matters, the proposal is assessed as follows:
- 5.86 With regard to the internal access strategy for the site, this comprises of a spine road running north to east through the development linking the various development parcels, except for the 'white land' to the south of Phase E and to the north of Parkers Lane for the reasons set out above.
- 5.87 The spine road consists of the following key vehicular access points:
- Primary link from the bypass via a three arm roundabout located at Edges Lane (approximately midway between the start of the bypass and Hall Lane);
 - Secondary link provided to the north of Long Stratton (between the edge of the settlement area and the start of the bypass), via a T-junction; and
 - Secondary access adjoining the development through to Hall Lane which will improved from the A140 up to the site access and will continue to the east where the alignment will be changed to facilitate a new road bridge crossing of the proposed bypass.
- 5.88 The intention is that the access strategy will direct traffic away from the existing town centre and onto the bypass and the wider A140 corridor to avoid unnecessary vehicular trips within Long Stratton, thus reducing congestion and journey times as well as enhancing the existing town centre.

- 5.89 In terms of car parking, this is proposed to be provided in accordance with the Norfolk County Council Parking Standards and determined as part of future reserved matters applications.
- 5.90 The Highway Authority have assessed the application and following amendments has raised no objections. However, they have highlighted some concerns regarding access to and the use of Hall Lane, which they consider is not of an appropriate standard for large scale growth and cannot be improved to an appropriate standard to cater for a significant increase in traffic. In addition, they consider that the junction of Hall Lane and the existing A140 is constrained and that there is limited opportunity to improve it. As such to make the development acceptable in highway terms, the Highway Authority require conditions which restrict direct vehicular or pedestrian access from or onto Hall Lane, (including Star Lane or Edges Lane), until such time that detailed drawings for highway improvement works indicating how such access shall be controlled have been submitted to and approved by the Local Planning Authority. Therefore, subject to an appropriately worded condition it is considered that the proposals are acceptable in this respect.
- 5.91 A condition is also to be imposed requiring the bypass to be completed (including Public Rights of Way works and the northern roundabout) prior to the occupation of a maximum of 250 dwellings combined across this development and application ref 2018/0112, in line with the LSAAP.
- 5.92 In light of the above and having assessed the amended proposals in terms of the issues raised in Section 4 of this report, I am satisfied that the proposals are in accordance with Policies DM3.11 and DM3.12 of the Local Plan, the LSAAP and LSNP, subject to conditions recommended by the Highway Authority relating to both the outline application and specific conditions relating to the delivery of the bypass.
- 5.93 Furthermore, the submitted Transport Assessment demonstrates that in accordance with the NPPF, the traffic associated with the proposed development does not represent a severe transport impact and it has been demonstrated that the residual cumulative impacts on the road network would not be severe.
- 5.94 Highways England has also commented on this application given the relatively close proximity of the A47 and they have confirmed that they have no objection to the scheme.
- 5.95 A Travel Plan will be secured by condition to be submitted and implemented to ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment as well as encouraging walking and cycling. This will be secured by the S106 Agreement along with a bond to secure a sum of money per dwelling negotiated with the Norfolk County Council for the delivery of the Travel Plan.
- 5.96 Turning to the requirements for enhanced walking and cycling facilities, the LSAAP requires the development to improve access to/from existing and new key services and facilities, such as the town centre, schools, medical facilities, leisure facilities/open spaces, and employment opportunities, as well as facilitating enhanced connectivity to the wider countryside and surrounding villages. Furthermore, where appropriate, it also requires the development to allow for easy bus circulation, maximising the number of people able to walk to/from bus routes.
- 5.97 The LSAAP goes on to identify various facilities to be delivered through S106 (for on site infrastructure) and the payment of CIL including public transport enhancements within Long Stratton and on the A140 corridor, bus priority at the A140/A47 junction and environmental enhancements to the village centre, to support the development and any necessary social and community facilities and public open space. However, these do not include the provision of on-carriageway cycle facilities.

- 5.98 The Long Stratton Neighbourhood Plan also requires development to maintain or enhance good connectivity in terms of sustainable connectivity and direct, safe and attractive walking and cycling routes between new neighbourhoods and the existing Long Stratton community and outlying areas. It also identifies measures towards environmental enhancements in the town centre, such as improved pedestrian permeability and access for cyclists in line with LNGS1, and to help establish The Street as the heart of the town.
- 5.99 The Highway Authority has maintained throughout the application process that this development should provide not just facilities within it for walking and cycling but also connect to and provide facilities that are off site and are considered as direct mitigation.
- 5.100 The submitted Masterplan and Design Code have sought to establish the principles in relation to pedestrian and cycle connectivity as well as supporting the delivery of the objectives of the Area Action Plan and Neighbourhood Plan.
- 5.101 The following has been identified within this planning application to support the proposals in outline form:
- A network of safe, legible and convenient pedestrian and cycle routes throughout the scheme, connecting to key destinations such as the school, the community hub and play spaces, and to the wider settlement of Long Stratton and the countryside;
 - a principal pedestrian/cycle link along one side of the bypass linking in with routes into Long Stratton centre via Hall Lane, Star Lane and Edge's Lane, and along the entire length of the bypass located on the western side of the bunding to provide separation from the road;
 - a network of off-road links between and within the development areas;
 - improved routes along Edges Lane and Star Lane (which will become traffic-free routes) to the countryside; including stopping up Edges Lane at the existing settlement edge and providing a new shared pedestrian and cycle connection along the Edges Lane corridor; and upgrading of the exiting Public Right of Way to connect with Star Lane;
 - pedestrian/cycle routes crossing the bypass at specific at-grade crossing places, typically at the roundabout junctions, where there are safe refuge points in the centre of the carriageway, and a bypass crossing point for the footpath between Long Stratton and Stratton St Michael;
 - upgrading of existing Public Right of Ways to connect with the existing development area;
 - reduced traffic flows through Long Stratton Town Centre.
- 5.102 In terms of pedestrian and cycle connectivity within the development, the masterplan and Design Code shows how safe, legible and convenient pedestrian and cycle routes could be created throughout the scheme, connecting to key destinations such as the school, the community hub and play spaces, and to the wider settlement of Long Stratton. As such and subject to the detailed design of these routes being agreed as part of any future reserved matters applications and conditions requiring detailed plans of the roads, footways, cycleways to be submitted and details of delivery and timing of road infrastructure within the site as part of the infrastructure phasing plan, it is considered that the relevant parts of the AAP and LSNP have been met and that the proposals comply with the Development Plan in this regard.

- 5.103 With regards to Public Rights of Way (PRoWs) and potential severance caused by the bypass, discussions have been ongoing since this application was first submitted. These have focused primarily on the relationship between PRoWs and the bypass and have included an informal consultation carried out by Norfolk County Council and interested parties regarding the diversion of affected PRoWs.
- 5.104 These discussions have sought to address concerns with the details of location, routes, connectivity, crossing facilities and enjoyment of the PRoW. The revised bypass drawings incorporate these amendments including: diversions and/or stopping up in relation to PRoWs references FP2, FP6, FP7, FP13, FP15, FP16, FP17, FP21 and FP26; proposed Restricted Byway/No Through Road provisions to A140, Parkers Lane (U76180) and Edges Lane (U76129) (masterplan).
- 5.105 Norfolk County Council Public Rights of Way Team have reviewed these proposals and accepts that in order to facilitate the delivery of the bypass that six PRoWs will be dissected (recorded as Long Stratton Footpaths 7,13,15,16,21 and 26).
- 5.106 In light of the above NCC PRoW have no additional comments to make in respect to the bypass PRoW diversions except that any further design changes to the bypass layout or associated drainage features will need further discussion with the PRoW team to ensure there will be no additional adverse effects.
- 5.107 Subject to the diversions and/or Stopping Up of PRoWs and proposed Restricted Byway/No Through Road provisions (to be formally dealt with through the Highways Act 1980), it is considered that the proposed relationship between PRoWs; the bypass and between Long Stratton and outlying areas, is acceptable in terms of meeting the objectives of the LSAAP and LSNP.
- 5.108 Turning to enhanced connectivity the LSAAP requires good walking and cycling links to be provided linking the new development to the town centre. This application is only currently proposing to bring forward sustainable links within the development itself and to ensure that they connect to existing footway links. There are no proposals to provide enhanced links such as cycling provision along the A140 or along Swan Lane.
- 5.109 As a result, all cycle trips are on the existing highway network which run through Long Stratton and connecting roads.
- 5.110 As part of ongoing discussions with the developer, a number of options have been explored with the Highway Authority to consider how cycle and pedestrian routes could help to facilitate enhanced connectivity in terms of works along the A140. Whilst no scheme has been submitted by the applicant, the Highway Authority has worked up and costed a scheme to inform what improvements could be delivered along the A140.
- 5.111 Whilst it is not considered acceptable to provide no enhanced links, particularly in the form of cycling provision along the A140, the applicant has offered a contribution of approx. £550k specifically towards this scheme.
- 5.112 This contribution would not be sufficient to deliver the scheme in its entirety, however having regard to the overall viability of the development together with potential future funding opportunities, both the highway authority and Local Planning Authority consider that this contribution on balance, is acceptable. It is envisaged that the County Council will deliver enhanced links, particularly in the form of improving cycling provision and connectivity along the A140 and a detailed scheme (albeit the funding mechanism is not required or secured by the Council's) will be led by the public sector. As such and subject to securing the above contribution via the Section 106 agreement, the proposals are, on balance, considered to comply with the objectives of the AAP and LSNP in respect to enhanced links.

- 5.113 Furthermore, when having regard to ensuring that any such cycling provision along the A140 would not prejudice efficient delivery of future or linked town centre environmental improvement works identified in the LSNP, the proposed contributions (together with potential CIL and/or other possible funding streams), also having regard to viability, is considered an acceptable way of securing this.
- 5.114 A condition is also recommended relating to the delivery of a footway/cycle path connecting the site to the A140 along Swan Lane to secure enhanced connectivity from the development to facilities in Long Stratton, such as schools, the leisure centre and key services in the town centre. Subject to the above, the proposals are considered to comply with the relevant criteria of Policy LNG1.
- 5.115 Subject to conditions the proposals are, on balance, considered acceptable and comply with Policy DM3.11 and DM3.12 of the SNLP, LNGS1 of the LSAAP and Policy SC4 and SC5 of the LSNP.
- 5.116 In terms of environmental impacts as identified in the submitted ES, the assessment shows that there will be a negligible effect on the highway network assessed during the construction phase. During the operation of the development there is considered to be a moderate beneficial effect within Long Stratton, including a substantial reduction in traffic volumes and delays within Long Stratton itself, but a minor adverse effect on traffic, severance, pedestrian/cycle delay, pedestrian/cycle amenity and a negligible effect on, fear and intimidation, accident & safety and public transport when considering the entire route from Long Stratton to the A140 / A47 junction.
- 5.117 The assessment demonstrates that the site is accessible and sustainable and with planned improvements built into the design of the masterplan as proposed and conditions as suggested above, is considered a suitable location to accommodate the development without adverse effect on the safe and efficient operation of either the local or strategic highway networks.

Site Conditions and constraints

- 5.118 This section within the allocation has the following requirements:
- *As a priority, a foul water strategy to be agreed with Anglian Water and the Environment Agency, regarding the nature and timing of capacity improvements and upgrades to the foul water public sewer network and Water Recycling Centre. No more than 1,000 dwellings occupied prior to written agreement with Anglian Water and the Environment Agency regarding solutions to current capacity constraints;*
 - *Any potential risk of surface water flooding must be addressed/mitigated satisfactorily through an appropriate surface water drainage scheme agreed by the Environment Agency.*
 - *Safeguarding provisions in the Norfolk Minerals and Waste Core Strategy Policy CS16 relating to investigation/prior extraction of resources will apply.*
- 5.119 The site allocation requires that as a priority, a foul water strategy to be agreed with Anglian Water and the Environment Agency, regarding the nature and timing of capacity improvements and upgrades to the foul water public sewer network and Water Recycling.
- 5.120 As part of the planning application process, detailed discussions have taken place with Anglian Water and the Environment Agency who have confirmed that treatment capacity will be available when required. As such it is not necessary to impose a restriction on the development (Policy LNGS1) regarding solutions to current capacity, providing all foul water is conveyed to the treatment works by new sewer pipes as the current pipes are at capacity. Furthermore, the proposed development flows will be assessed by Anglian Water as part of any future reserved matters application to determine whether any further works to the local foul infrastructure is required in accordance with their regulatory and statutory responsibilities.

- 5.121 Policy DM4.2 of the SNLP and Policy JCS 1 of the JCS require new major developments to incorporate sustainable drainage systems (SUDS) to manage any surface water run-off and to minimise the risk of flooding on-site and in the surrounding area. The NPPF also requires Local Planning Authorities to ensure development does not increase flood risk elsewhere and to incorporate sustainable drainage systems in to development proposals, unless there is clear evidence that is would be inappropriate.
- 5.122 A Flood Risk Assessment and Foul and Surface Water Drainage Strategy has been submitted in support of the planning application, including other supporting information.
- 5.123 The site is located within Flood Zone 1 which has a low probably of flooding from rivers and the sea. The site is also at a low risk of surface water flooding. However, there are some areas identified as being at medium and high risk. These areas are located along Star Lane which originates from overland flow paths and the fall in topography east to west through the site, as well as to the south through the site that broadly aligns with the watercourses. It is noted that the proposed development will also result in a change in the operation of the existing land drainage systems, through the implementation of new structures (such as culverts) to accommodate the bypass and highway works.
- 5.124 To mitigate against these risk as well as ensuring wider flood risk is managed, the drainage strategy for the site proposes that surface water will discharge to on-site and surrounding drains at existing greenfield rates and surface water runoff will be attenuated on-site for events up to the 1 in 100 probability storm events including an allowance for climate change. The strategy consists of sustainable drainage features (SuDS) such as permeable paving and attenuation areas to ensure there are robust measures in place to manage surface water before it is discharged into the watercourse. In terms of the bypass, this includes swales and drainage ditches to intercept and hold surface water and discharge to a network of flood mitigation ditches to ensure a controlled discharge at greenfield run off rates.
- 5.125 As a consequence of nutrient neutrality, the drainage strategy has been amended to include wetlands as part of the SuDS features located downstream of the proposed drainage basins and within the proposed drainage ditches associated with the residential development. The purpose of the wetlands is to treat surface water to reduce the amount of pollution entering the watercourses from the development to achieve nutrient mitigation during the initial phases of development.
- 5.126 The LLFA, Anglian Water and the Water Management Alliance IDB have been consulted on the application and following the submission of additional information and amendments, has raised no objections to the application in respect of surface water and flood risk, subject to the imposition of a condition requiring the submission of detailed designs for the surface water drainage scheme as part of future reserved matters applications, to ensure sufficient information is provided to establish that the application has an acceptable drainage strategy in place.
- 5.127 Given the time period in which the application has been under consideration it has been necessary for the LLFA to update their comments having regard to updated national climate change guidance for flood risk assessments (updated in May 2022). This effectively means that a specific river catchment climate change allowance is now applied.
- 5.128 As the updated peak river flow climate change allowance leads to a reduction in the modelled flood risk extents, the LLFA considers the modelled flood risk previously submitted show a more extreme event, and therefore, a higher level of mitigation is currently provided in the design than is required. Should the applicant seek to redesign the mitigation arrangements in the future, then the LLFA would expect new information to support the proposed design, as there could be a change in the mitigation that could impact the level of risk associated to the proposed development and may have additional implications.

- 5.129 As such an updated condition is recommended in relation to the proposed surface water drainage schemes for the outline development, requiring that the new allowances are applied.
- 5.130 In terms of the surface water drainage within the full planning application area i.e. the bypass, the LLFA will require updated surface water drainage modelling to be provided as part of the planning application prior to determination.
- 5.131 To enable this information to be provided prior to determination, delegated authority is therefore sought to authorise the Assistant Director of Planning to approve subject to there being no substantive comments received from the LLFA relating to surface water drainage within the full planning application area.
- 5.132 The LLFA have also reviewed the additional information provided in the updated application that relates to how the proposed scheme will deliver the nutrient neutrality requirements for this application. The LLFA continues to have no objection subject to an additional condition being attached to any consent, along with their previous conditions, requiring detailed designs for the long-term wetland mitigation strategy to ensure the proposed development does not increase the surface water flood risk either onsite or elsewhere.
- 5.133 With regards to the future management and maintenance of all surface water features and foul infrastructure within the site, including watercourses, these are proposed to be adopted by Anglian Water who will maintain these throughout the lifetime of the development. Management and maintenance will be secured by condition. All drainage features associated with the bypass will be offered and managed by the Highway Authority.
- 5.134 The LLFA has assessed the future management and maintenance arrangements of the surface water features and considers that the application has a viable proposal for the adoption and maintenance of these for the lifetime of the development in accordance with the NPPF.
- 5.135 Therefore, whilst it is understood there is some local concern regarding flooding events, the LLFA and Anglian Water and in turn the LPA are satisfied that the proposed surface water drainage and foul drainage would be adequately addressed through the proposed development and the implementation of sustainable drainage systems. In doing so, the proposed development would not increase existing surface water risk elsewhere.
- 5.136 As such subject to conditions and delegated authority to authorise the Assistant Director of Planning to approve subject to there being no substantive comments received from the LLFA relating to surface water drainage within the full planning application area, the proposals are considered to be in accordance with Policy DM4.2 of the SNLP, Policy JCS 1, the AAP and National Planning Policy Framework paragraph 167, 169 and 174, by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.
- 5.137 In terms of environmental impacts as identified in the submitted ES, the assessment shows that mitigation measures to ensure future users of the proposed developments will be adequately protected from flooding and that the development will not increase flood risk elsewhere. No potentially significant effects have been identified which require mitigation, both during the construction and operation phase in respect to surface water.
- 5.138 Furthermore, cumulative effects of all surrounding committed schemes as identified in the ES, would not result in adverse effects to hydrology, flood risk and water resources.

Minerals safeguarding

- 5.139 Norfolk County Council in its capacity as the Mineral and Waste Planning Authority have commend on the planning application and have raised no objections. No safeguarded mineral resources occur within the areas identified for built development, although some of the areas of open space close to the Water Recycling centre are underlain by safeguarded sand and gravel. Anglian Water as the operator of the Water Recycling Centre have been consulted regarding potential impacts on the existing operation from proposed development and have raised no objections. As such is considered that the proposals are acceptable in this regard.

Other matters

- 5.140 In the interests of completeness, and whilst there is some overlap with the various sections within the allocation, the following section of the assessment seeks to highlight how the scheme complies with the other relevant policies within the SNLP.

Landscape and visual impact

- 5.141 Policy DM4.5 requires all development to respect, conserve and where possible enhance the landscape character of its immediate and wider environment. Policy DM4.9 looks for a high quality of landscape design, implementation, and management as an integral part of new development. Policy DM4.8 promotes the retention and conservation of trees and hedgerows and advises that the Council will promote the retention and conservation of significant trees, woodlands and traditional orchards. Policy DC7 of the LSNP requires development proposals to be sympathetic to Long Stratton's local landscape character, including the landscape which surrounds the settlement.
- 5.142 A landscape and visual impact assessment (LVIA) accompanies the application, which considers the landscape and visual effects resulting from the development and the application Sites.
- 5.143 With regards to landscape character, the northern part of the site is largely within the Landscape Character Area B1 - Tas Tributary Farmland and the southern part is within E2, Great Moulton Plateau Farmland.
- 5.144 The strategy and mitigation seek to reinforce and enhance local landscape patterns and character. It does not aim to fully screen the development, but rather to develop and enhance the relationships between the settlement and countryside edge. The following mitigation measures are proposed to reduce the overall negative effects of the development which are intended to result in an enhancement of overall landscape character and quality as the new planting matures:
- extend and reinforce the existing landscape patterns, with a gridded pattern of fields and woodlands to the east/south of Long Stratton (as per the Great Moulton Plateau Farmland LCA) and more diverse, organic boundaries and planting to the north and west (as per the Tas Tributary Farmland LCA);
 - integrate the new development in a way that avoids allowing the bypass to dominate - by 'breaking' the curved bypass alignment with a contrasting gridded geometry, which is expressed by blocks of woodland;
 - shape the new planting so that it 'stitches together' the eroded pattern of fields, hedgerows and woodlands to the east of the village, framing open views out from Long Stratton to the surrounding countryside and gateway views westwards towards the village from Mill Road and local rural footpaths;
 - keep the height of the roadside landforms at or below 2m, which is a relatively low height for a road and landscape of this scale. This is in order to achieve a unified horizon line and to minimise the potential visual impact of such landforms in the relatively flat plateau landscapes to the east of the bypass;

- supplement the large-scale site boundary and off-site planting with characterful, diverse and richly planted landscapes within the Site, designed to express contrasts in character between the new neighbourhoods and streetscapes – at the scale of the residential areas, so that the new development has a soft, relatively ‘green’ appearance in views from the surrounding countryside;
- enhance green infrastructure connections between Long Stratton and its rural hinterland, providing a variety of circular walks and encouraging people to walk and cycle to local destinations;
- ensure the special, heritage character and landscape setting of St Michael’s Church is conserved, with improved pedestrian links between Long Stratton and Stratton St Michael;
- select tree and shrub species which are appropriate for local soils and which reinforce the inherent character of the landscapes which provide the context to Long Stratton;
- establish robust measures for landscape adoption and management long-term.

- 5.145 Officers are of the opinion that the proposed development will inevitably have an impact upon the landscape character, however the effects will be reduced in the longer term by the proposed mitigation, which will contribute to an overall enhancement of visual character and quality of the landscape.
- 5.146 Turning to visual effects and identified viewpoints, these are predicted on the LVIA to have significant adverse visual effects during the construction stages of the development (views 2, 3, 4, 6, 8, 12, 13, 15, and 17), which given the scale of this development and the relatively open character of the farmland landscape to the east of Long Stratton and immediately to the west of the A140 (at viewpoint 15) is to be expected. For most of these same viewpoints, significant adverse effects are expected to continue through to the completion but will soften as new tree planting and landscaping becomes more effective over time. After 15 years, the predicted visual effects are generally low or positive, as the new planting matures and screens the development, which is predicted to enhance some of the degraded character of the open farmland to the east of Long Stratton.
- 5.147 To minimise the negative landscape and visual impacts of the proposals, both during construction and post construction, the application proposes a mitigation strategy, which is detailed in a Green Infrastructure and Open Space Strategy and Design Code for the development. A separate Landscape and Ecology Management Plan (LEMP) also provides a schedule of landscape management activities/measures which establishes the principles for ongoing management that secures the long-term objectives of the green infrastructure strategy, to be secured by condition.
- 5.148 In terms of the bypass and its delivery in advance of other phases of development, the detailed proposals for the bypass include landscaping and associated bunding to be introduced as part of this application to ensure any short and medium term reversible adverse landscape and visual effects are mitigated.
- 5.149 These mitigation measures are secured by the detailed design proposals contained in the application and LEMP as well as secured through the conditions of the planning permission and subsequent Reserved Matters approval for the remaining areas. In addition, the Design Code, which is submitted as part of the planning applications, provides detailed guidance for the implementation of the mitigation measures.
- 5.150 Having regard to the above development proposals and to protecting the distinctive characteristics, special qualities and geographical extents of the identified character areas, Officer’s acknowledge that the proposed development will have an impact upon the landscape character, however this will be relatively short term and the effects will be reduced in the longer term by the proposed mitigation, which will contribute to an overall enhancement of visual character and quality of the landscape. Moreover, where the adverse effects are anticipated to be significant, the mitigation measures proposed will be incorporated into the design of the development to ensure the impacts are reduced over time, particularly as the proposed planting matures.

- 5.151 Consequently, it is considered that on balance, the development would be acceptable with regards to its anticipated impact upon the character and visual effects of the landscape, particularly when noting the mitigation/enhancement measures identified above and the fact that the site already benefits from being allocated in the LSAAP.
- 5.152 In terms of environmental impacts as identified in the submitted ES, the assessment shows that there are predicted to be significant negative landscape effects on some landscape receptors during the construction and immediate post-construction stages of the development, primarily hedgerows and mature hedgerow trees, rural landscape and tracks and long expansive views. These effects are considered temporary and, given the existing open character of the site and proposed bypass. No significant negative landscape or visual effects are predicted to occur following completion of the Long Stratton development and bypass development. Instead, the mitigation measures identified will ensure that there will be no significant negative effects and that the overall result will be an enhancement of overall landscape and visual character as the new planting matures.

Furthermore, it is considered that, due to physical distance and visual separation between other committed developments as identified in the ES, there will be no cumulative impacts.

Trees and hedgerows

- 5.153 Policy DM 4.8 of the SNLP seeks to promote the retention and conservation of trees. Policy 1 of the JCS emphasises the importance of protecting, maintaining, restoring, and enhancing environmental assets, in addition to promoting the provision of multifunctional green infrastructure. The above policy objectives are reinforced under paragraph 131 of the NPPF.
- 5.154 The application is supported by a Tree Survey and Arboricultural Impact Assessment, which identifies the extent of tree and hedge removal across the site, which is limited to the removal of mostly low-quality trees. However, it is also noted that the hedgerow adjacent and perpendicular to Hall Lane, will be required to be removed as part of the bypass works, which has been determined to be an 'Important Hedgerow', as part of the Hedgerow Regulations 1997.
- 5.155 In considering this, the proposals must be assessed in conjunction with the aspirations to deliver a bypass and the approved site allocation, which will necessitate the removal of some trees and hedgerows.
- 5.156 To mitigate against the loss, it is recognised that the retention and improvement of other visually prominent trees and hedgerows is proposed, as well as extensive new tree and hedgerow planting, woodlands, landscaping and species enhancements along the bypass, which in my opinion, will help to retain and enhance the overall landscape character of the site and its boundaries.
- 5.157 As such, whilst it is recognised that trees and hedgerows should be retained where possible, it is not considered possible to retain the trees and sections of hedgerows identified for removal in this instance whilst also delivering the requirements of the development and LSAAP.
- 5.158 The loss of these trees and hedgerows, is therefore on balance considered acceptable when having regard to the weight afforded to the requirements of the site allocation and proposed mitigation measures, which in my opinion outweighs the loss in terms of the benefits of the development in accordance with Policy DM4.8.

- 5.159 The proposed development would therefore be in accordance with Policies DM4.4 and DM4.8 of the SNLP, Policy 1 of the JCS, and accord with the relevant objectives and policies contained within the NPPF and the requirements of LSNP and LSAAP, subject to conditions requiring updated surveys should these become out of date at the time of submission of reserved matters, details of tree protection measures and adherence to the proposed mitigation measures.

Ecology and Protected Species

- 5.160 Policy DM4.4 of the SNLP requires developments to contribute towards the establishment and positive improvement of coherent ecological networks, including biodiversity enhancements and multi-functional Green Infrastructure. Policy 1 of the JCS, amongst other matters, requires developments to improve the resilience of ecosystems to environmental change, as well as ensuring that developments are assessed in accordance with national policy and legislation. Policy GI19 of the LSNP requires development proposals which impact upon identified biodiversity assets to contribute to, rather than detract from, their biodiversity value as well as considering wildlife connectivity to and from these sites. The policy also expects developments to deliver net gains in biodiversity by creating or enhancing habitats. Furthermore, Policy GI17 requires the delivery of Green Infrastructure in Long Stratton where under Local Plan provisions and Policy GI18 expects development to provide robust arrangements for the future maintenance.
- 5.161 This application is supported by an Ecological Impact Assessment, which includes a suite of ecological surveys describing the habitats, protected species, designated sites, and other ecological matters associated with the site.
- 5.162 The application is also supported by a Landscape and Ecological Management Plan (LEMP) setting out the appropriate management options for achieving ecological and biodiversity enhancements such as bat boxes, bird boxes, and hedgehog gap, as well as the mechanisms by which the long-term implementation of the plan will be secured and delivered.
- 5.163 The submitted Design Code document gives greater detail addressing some of the previous comments made by the County Ecologist, in terms of public open space, green infrastructure, hedgerow planting, green landscaping/screening, and permanent water bodies.
- 5.164 The overall ecological aim of the proposed development is to ensure no net loss of biodiversity, largely by working to achieve a net positive ecological impact on-site. Requirements for ecological enhancement measures which would achieve a net positive impact are set out in the submitted Environmental Statement Biodiversity chapter, which are proposed to be further detailed in a Construction Environmental Management Plan (CEMP), to be secured by planning condition. A condition is also recommended requiring that each Reserved Matters application is accompanied by a detailed Biodiversity Method Statement and a Biodiversity Net Gain Audit (post completion) to demonstrate the proposals have met their commitment (as set out in Chapter 7 of the Environmental Statement) to achieving no net loss of hedges and trees, demonstrate no net loss, and demonstrate Biodiversity Net Gain.
- 5.165 The LSAAP also considers severance of protected species habitat and emphasises the importance of green infrastructure to facilitate wildlife movement. The LSAAP specifically mentions two new Commons but notes this relates to 'the nature and layout of the open space, reflecting the character of the historic commons, rather than being laid out as formal recreation spaces' and one 'common' [LS3] being 'primarily for public use as a 'gateway'. The second 'common' [LS4] with ponds for protected species with some residential access. The locations are shown in Appendix 3 of the LSAAP and are indicative.

- 5.166 A Landscape Masterplan is submitted as part of the application, which identifies two 'commons' – Star Lane Common, and Hall Lane Common, both of which are included within the open space provision of the site and are detailed in the LEMP. Further detail of how the Commons will be designed will be required at the reserved matters stage to ensure there is no conflict with potential SuDS and wetland features. Where SuDS do not form part of the open space it is recommended that details of the permanent water to provide wildlife habitat is secured by condition as part of a Biodiversity Method Statement, guided by the submitted LEMP and Design Code.
- 5.167 Further conditions are recommended relating to lighting and showing where dark corridors will be provided through the landscape for bats, and a condition recommended that updated ecology surveys are submitted should they become out of date at the time of the submission of reserved matters for each phase of development.
- 5.168 In terms of construction activities and the potential effects on ecology, all necessary mitigation is recommended to be secured by condition requiring a Construction Environmental Management Plan (CEMP) based on the recommendations of the LEMP and detailed assessment contained in the submitted Environmental Statement.
- 5.169 Subject to conditions securing mitigation measures to minimise the risk of harm to protected species, including details of enhancements for biodiversity within the development and existing boundaries, the proposals are considered acceptable in this regard
- 5.170 As part of the proposed mitigation package, a District Level Licensing scheme has also been agreed with Natural England to compensate for on-site impacts to great crested newts. The majority of the compensation for great crested newts will be provided off-site, along with the retention of some on-site ponds and on-site Green Infrastructure. This will be secured by developer contributions to fund targeted offsite habitat improvements carried out by Natural England.
- 5.171 With regards to non-statutory designated nature conservation sites, the following have been identified within 2km of the development:
- Tyrrell's Wood and New Plantation CWS, approximately 0.57km south-east of the site. The CWS comprises two woodlands which border the Pulham Market Big Wood SSSI.
 - Wood Green CWS, approximately 0.43km east of the site. The CWS is noted for its ponds and its mosaic of neutral grassland, scrub and woodland.
 - Hill Farm Woodland CWS, approximately 0.77km west of the site. The CWS is a semi-natural woodland with a series of large oak *Quercus robur* pollards, estimated to be up to 300 years old.
 - Pecks Plantation CWS, approximately 1.2km north-west of the site. The CWS is noted for its acid heath, woodland and scrub. At the time of the last survey in 1995, the site housed an active bat hibernaculum.
 - Fritton Grange Meadows CWS, approximately 2km north-east of the site. The CWS is noted for its tall grassland and tall fen vegetation, plus its ponds and network of dykes.
- 5.172 To limit the likelihood of nearby designated nature conservation sites experiencing potentially harmful increases in recreational effects because of the increased residential population, the application proposes extensive areas of open space and informal Green Infrastructure, including circular walks, directional signage and connections with pre existing GI (such as footpaths etc).

5.173 The principle green infrastructure features proposed to mitigate these impacts are:

- open space within development areas – including village greens, play areas and commons;
- strategic green infrastructure and landscape buffers;
- major green corridors that connect the existing village of Long Stratton to the countryside via the new development areas, including at Star Lane and south of Hall Lane;
- enhanced off-road footpath connections to Haynton's Lane (to the west) and Boudica's Way (to the east) with safe crossing points and connections
- quiet green lane status for Parker's Lane, Star Lane and Edge's Lane, which will be closed to through traffic and will provide safe cycle routes to Mill Lane and the rural roads beyond;
- a new linear park along the east fringes of the development, separating residential areas from the bypass, which will incorporate a cycleway and a network of circular walks to connect the neighbourhoods and green spaces an extensive open space along the Picton Stream valley, which provides recreational links between local roads (Swan Lane and Brand's Lane) and the wider network of footpaths to the west of Long Stratton;
- Planting of native and locally suitable trees and hedgerows on the developed site, including new woodland and copses;
- Individual, scattered and small groups of trees within grassland;
- New areas of amenity and meadow grassland managed for the benefit of native grasses and flowers;
- Swales and SuDS incorporating wetlands and new ponds;
- Skylark mitigate package comprising nesting plots, monitoring surveys and developer contribution secured by the S106;
- provision of at least 1km of off site hedging to mitigate the loss of habitat for the yellowhammer secured by S106
- Bird boxes, bat roost boxes and porous terrestrial friendly fences.

5.174 Monitoring is also proposed to document any change in habitat condition as a result of increased visitor use from the new development. Monitoring requirements are outlined in the submitted LEMP which require habitats to be monitored both pre construction and throughout the development to inform the future management of onsite Green Infrastructure and the delivery of any additional mitigation if deemed necessary to achieve the aims of the LEMP. A condition is recommended requiring the LEMP to be updated for each phase or sub-phase of the development to identify any necessary remedial measures/alterations to the management regime or mitigation to improve the biodiversity value of the site, including additional planting and management of public areas, ancillary measures such as bird and bat boxes, lighting of sensitive areas and a timetable for implementation and proposed wetland areas required to mitigate Nutrient Neutrality.

5.175 Having regard to the above and the Council's Ecologist's assessment of the potential impacts on the non-statutory designated nature conservation sites, it is considered that the development will not have significant adverse impacts on statutorily protected nature conservation sites or natural assets, subject to the appropriate mitigation set out above and conditions.

5.176 In terms of international designated sites, the nearest sites are between 16 and 17km from the development, which are the River Wensum SAC, The Broads SAC, Broadland SPA, Redgrave & South Lopham Fens Ramsar and Waveney & Little Ouse Valley Fens SAC.

5.177 In the context of the Habitats Regulations it is evident that, as competent authority, SNC will have to adopt a Habitats Regulations Assessment (HRA) to set out how the impacts on international designated sites in the surrounding region are mitigated, and this will need to be finalised with input from Natural England prior to any decision.

- 5.178 The necessary mitigation, as well as those set out in respect of biodiversity above, will also include the following:
- 5.179 With regard to combined recreational impacts, the site is located within the Zones of Influence (ZOI) for the Habitat Sites and as such mitigation measures are required to adequately mitigate potential in combination recreational impacts on the Brecks, Broads, East Coast and Norfolk Valley Fens Habitat Sites. In accordance with the Norfolk Green Infrastructure and Recreational impact Avoidance Mitigation Strategy (RAMS), dated March 2021, an index linked RAMS contribution will be secured through the S.106 to mitigate against any adverse effects of the proposed development on the integrity of the Habitat Sites.
- 5.180 Members should note that the Landscape Masterplan includes some areas outside of the red line boundary, but not some areas within the red line. As such it is recommended that the Landscape Masterplan is amended prior to the determination of this application to include all areas within the red-line and exclude those outside.
- 5.181 With regard to nutrient neutrality, this site is located within the catchment area of one or more of these sites as identified by Natural England and involves the creation of additional overnight accommodation and therefore a net increase in population in the catchment. As such, The Broads Special Area of Conservation (SAC) and Broadland Ramsar are at risk of an increase in phosphorus or nitrogen supply caused by the development, which will likely give rise to a significant effect on the conservation objectives of the protected habitats.
- 5.182 On this basis it will be necessary to mitigate impacts in respect of this issue. In response the applicant has undertaken a nutrient budget calculation to understand the level of phosphates and nitrates generated by the development that need to be mitigated for as a consequence of the proposed development.
- 5.183 These figures have been reached using the Natural England Broads SAC and Broadlands Ramsar Site Nutrient Budget Calculator but adopting a Norfolk-specific occupancy rate of 1.89 persons per dwelling which has been adopted by the Local Planning Authority and agreed with Natural England. This is opposed to using the Norfolk Nutrient Budget calculator in its entirety, based on applicants preference to take a more cautious approach to calculating the nutrient budget for the site.
- 5.184 Having established what needs to be mitigated the application has put forward a strategy based upon both short term and long term elements.
- 5.185 The short-term mitigation strategy for the proposed development includes the use of a three stage SuDS treatment train and temporary fallowing of part of the site i.e. taking agricultural land out of production, to achieve nutrient neutrality on site up to 857 dwellings whilst a long-term mitigation strategy is developed.
- 5.186 The longer term strategy comprises of three possible solutions for the development, including creation of an offsite wetland, Anglian Water upgrades and proposals under the Levelling Up and Regeneration Bill which would result in the entire 1,875 dwelling development achieving nutrient neutrality.
- 5.187 In relation to Natural England advice, mitigation should be in place so as to avoid either permanent, or temporary increases in phosphate loads to the designated site and must be effective for the duration of the effect and typically taken as in perpetuity.
- 5.188 Both the short-term and long-term solutions set out are proposed to achieve nutrient neutrality. However, it should be noted that the temporary fallowing of part of the site is an interim solution whilst larger, long-term strategic solutions are established.

- 5.189 The three potential solutions are considered below in more detail to achieve a long-term strategy that could allow the entire development to achieve neutrality.
- 5.190 These include an offsite wetland of additional land in the landowner's control which has been screened to demonstrate there is available land within the same catchment to offset the proposed development's remaining nutrient budget. The second solution follows ongoing discussions between the applicant and Anglian Water to upgrade the Long Stratton Waste Recycling Centre (WRC) to remove nutrients from the catchment via catchment offsetting or upgrades to the WRC. The third solution is through the amendments to the Levelling Up and Regeneration Bill (LURB) which will place a new statutory duty on water and sewerage companies in England to upgrade Wastewater Treatment Works by 2030 in 'nutrient neutrality' areas. If the proposed amendment to the LURB is implemented the applicant's assessment indicates that the reduction in foul drainage impact from the proposed development at Long Stratton will result in the development achieving neutrality in combination with the implementation of the proposed SuDS strategy across the site as detailed above. Should the last two options not achieve neutrality for the site in its entirety, the remaining budget is proposed to be offset by the offsite wetland in option 1.
- 5.191 Having regard to the above, further discussions with Natural England are required to consider the proposed mitigation strategy and the appropriateness of the above as to date no agreement has been reached with them.
- 5.192 Members should also note that at the time of writing, further updated information has been submitted by the applicant in respect to nutrient neutrality including a shadow Habitats Regulations Assessment, which is being considered by Natural England and the Council as Competent Authority, but at present no agreement has been reached through an Appropriate Assessment that that the proposals would result in achieving nutrient neutrality.
- 5.193 On this basis the recommendation is to delegate authority to the Assistant Director of Planning to approve the application subject to receiving no substantive comments from Natural England and the Council as Competent Authority being satisfied through an Appropriate Assessment that the short term and long term mitigation strategy would result in the entire 1,875 dwelling development achieving nutrient neutrality.
- 5.194 In terms of environmental impacts as identified in the submitted ES, the predicted impacts to ecological receptors resulting from the proposed development have been assessed. Without mitigation, negative effects would be predicted.
- 5.195 Residual post-mitigation significant effects are predicted for some of the grass verges in the east of the site. A significant effect is also predicted for hedgerows and trees, as some removal will inevitably be necessary to accommodate the proposed development. However, in this case this effect would be temporary and reversible, as long-term compensation would create at least an equivalent amount of hedgerow and tree habitat at the site.
- 5.196 A short-term significant effect is also predicted for the local/parish yellowhammer population due to land-take and skylarks, but once the compensatory and mitigation measures are in place, to be secured through the S106, this effect is expected to become not significant. All other significant pre-mitigation effects will be avoidable by providing the mitigation measures set out by conditions and the S106.
- 5.197 Negative effects to great crested newts and roosting bats will be addressed through EPS licensing and licences have been obtained where necessary, a copy of which will be required by condition.
- 5.198 The developed site has scope for extensive ecological enhancement through incorporation of Green Infrastructure, to be installed and managed for the benefit of a range of valued ecological receptors.

Impact on historic environment

- 5.199 Policy DM4.10 of the SNLP sets out that proposals must have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place. It goes on to cite that considerable importance and weight must be given to the desirability of preserving listed buildings, their settings and the character and appearance of conservation areas. Policy DC9 of the LSNP and the AAP reaffirms these policy requirements with specific regard to strengthening and enhancing Long Stratton's historic core.
- 5.200 The Council also has statutory duties, under s.66(1) and s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving the significance of listed buildings and the desirability of preserving or enhancing the character or appearance of conservation areas. Paragraph 200 of the NPPF makes it clear that any harm to, or loss of, significance of a designated heritage asset should require "clear and convincing justification". Furthermore, Paragraph 202 of the NPPF requires that where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal.
- 5.201 In terms of heritage impacts, there are a number of assets affected around the site, including the Long Stratton Conservation Area, a number of Grade I and Grade II* listed buildings (mostly churches) and many Grade II listed buildings. There are also several Buildings of Townscape Significance identified within the Long Stratton Conservation Area which are potentially affected by the proposals.
- 5.202 The application is accompanied by a Heritage Statement, which goes through the significance of each asset in turn, and the impact of the development proposals, which are to varying degrees. The submitted Environmental Statement goes into more detail and attributes sensitivity and potential impact to each asset.
- 5.203 The Council's Senior Heritage and Design Officer has assessed the proposals and has identified varying degrees of harm, but acknowledges that the level of harm is difficult to identify at this outline stage, as the impact is to a large extent determined by the final proposals.
- 5.204 Along Norwich Road to the north there are a number of heritage assets affected ranging from smaller C17/C18 cottages, from single storey with dormers to two storeys, to the three storey Georgian farmhouse The Cedars. The Cedars is more of an exception, as a large Georgian farmhouse, with the C17/C18 smaller cottages being most characteristic of historic housing in the area.
- 5.205 Grade II listed Orchardleigh along Norwich Road will also lose its connection at the rear to open countryside (the cottages to the north less so as there are outbuildings to the rear), and this will need to be taken as an element of moderate harm, although of benefit, will be the loss of through traffic to the road to the front. Similarly listed houses on the west side, Pepyrs, Low Cottage, Walnut Tree Cottage and The Red House, will all lose their connection to the open countryside at the rear. 1 & 2 Church Lane and Well Meadow will be similarly affected by the proximity of the roundabout.
- 5.206 There will also be a degree of impact on the grade II listed heritage assets along Norwich and Ipswich Roads which are still viewed in a dispersed and rural context, which to some extent will be lost either through development at the rear or to the front. This will again result in some degree of harm, even though the removal of through traffic from the front will result in some benefit.
- 5.207 The listed windmill is a local landmark and is a positive aspect of the proposals that it is being used as a landmark in terms of landscaping and the footpath network..

- 5.208 The two Stratton Churches of St Michaels and St Marys (both grade I) are both important heritage assets of high significance directly affected by the proposals. The bypass and general layout of the area close to St Michaels will inevitably have a considerable impact on how the churchyard is experienced and also its connection to the Old Parsonage.
- 5.209 The heritage statement identifies a moderate adverse impact on both St Michaels church and the Old Rectory, which have close historic associations, as a result of the imposition of the new road and the loss of connection across open fields with the Old Parsonage. This will result in both rural and visual changes. There will also be a degree of harm to the setting of the Old Parsonage resulting from the development, although land immediately to the south west and east of the Parsonage has already been developed.
- 5.210 To the east of the village, including the various listed buildings near to St Michaels, the loss of open and flat landscape will have some impact together with traffic noise. The proposed landscaping alongside the bypass and the rural edge treatment to the housing facing towards the countryside is intended to help mitigate intrusion of the bypass and its impact in terms of noise and to some extent. This to some extent is considered an improvement to the existing setting of the listed buildings which are currently viewed in the context of the earlier estate expansion of the village.
- 5.211 The east side of the settlement is more closely connected to the village centre which is a conservation area and the extent of growth will change how the town centre is used particularly in terms of different types of traffic i.e. residents accessing services rather than through traffic. The bypass will remove to a large extent the disturbance and harm caused to the setting of the listed buildings by through traffic, including lorries, and can therefore be considered to have a beneficial impact on the character and appearance of the conservation area and listed buildings within it.
- 5.212 With the exception of St Marys and its immediate setting to the East, the listed buildings within the village centre do not have significant intervisibility with the open countryside to the east. There are some glimpsed views through to landscaping in the gaps between the former Victorian villas immediately south of Stratton Motor Company garage. There is also a good view along Flowerpot Lane looking east with a pair of Victorian semis terminating the view and the wooded copse behind visible as a backdrop, with the grassed field visible between the gaps.
- 5.213 The Design Code shows a lower density and green space for this small pocket of development, and with appropriate landscaping it is considered that this can be mitigated by careful arrangement of housing and at the reserved matters stage. Furthermore, the wooded copse which has tall trees and sits high on the ground, will continue to provide a backdrop in views from Flowerpot Lane, as well as the setting of the church. It is recommended that a condition is included requiring that the developers complete a design code compliance statement showing how the lower density areas and green spaces are applied at the reserved matters stage.
- 5.214 In terms of the commercial site to the south, given the outline nature of the planning application, the impact on the listed buildings along Ipswich Road is more difficult to assess at this stage. However, it is acknowledged that any change of use of land and introduction of built form will inevitably have an impact. This impact will need to be fully assessed as part of any reserved matters application and mitigated accordingly.
- 5.215 In considering the points above and comments received, the local Planning Authority consider that on balance the Heritage Statement is fit for purpose, and that the scheme does have appropriate regard to the nearby heritage assets, and their setting, when considering the proposed mitigation highlighted and that detailed reserved matters application could add sufficient detail in respect of further mitigation of the impacts the proposals are acceptable.

- 5.216 Historic England have also commented on the proposals, concluding that they do not wish to offer any advice on the revised proposals and that the views of the Council's specialist conservation and archaeological advisors should be sought.
- 5.217 In terms of the harms identified and given the sensitivity of the existing environment, the heritage assets within the eastern 'ancient countryside' area, are the most adversely affected. The most significant effects are those to the Grade I Listed Church of St Michael, which despite mitigation, will likely result in a moderate adverse effect due to the rural and visual changes to its setting resulting from the noise of the bypass and the consequential landform and landscape changes required to mitigate this.
- 5.218 Having regard to the above, both Policy DM4.10 and the NPPF makes it clear that the harm should be weighed against the public benefits of the scheme (para 202). Consideration must also be given to JCS 2 and DM 4.10 of the local Plan and section 66 of the Planning (Listed Building and Conservation Areas) Act 1990.
- 5.219 As outlined above it is considered that some harm, including less than substantial harm to the Church of St Michael, and a similar level of harm (i.e. at the higher end of 'less than substantial'), is also attributed to the impact on Nos. 1 & 2 Church Lane and Rhees Green Cottage, which are Grade II listed would occur as a result of the development.
- 5.220 It is therefore necessary to establish if there are public benefits that outweigh the harm. In this case, the benefits are mainly associated with the construction of the bypass which would result in substantial beneficial effects for those heritage assets that within or are in close proximity to the existing A140, including the Long Stratton Conservation Area which is currently dominated by heavy trunk road traffic.
- 5.221 The removal of the trunk road traffic from the centre of the village offers scope for substantial public realm improvements that will significantly enhance the character and appearance of the Conservation Area and the setting of numerous listed buildings, not least of which include the Grade I Listed St Mary's Church and the Grade II* Listed building on The Street. The Neighbourhood Plan includes policies which specifically set out the expectations of the development of the application site, notably Policy TC13 which seeks to re-establish The Street as the heart of the town whilst TC14 seeks the creation of a new market place.
- 5.222 The removal of heavy lorries and other traffic is a key objective of the vision set out in the Long Stratton Area Action Plan and feeds directly into the 'Town Centre Objective' of revitalising the town centre by enhancing the historic streetscape of the conservation area and creating a safer and more attractive environment. These associated improvements in turn provide an opportunity for works to help create attractive public spaces and retain or enhance facilities to encourage the revitalisation of Long Stratton's historic core.
- 5.223 Furthermore, the prospects for the long-term conservation and viability of these heritage assets is greatly enhanced by the proposed development, which is reinforced in the Long Stratton Conservation Area Character Appraisal, which states it is 'imperative that the village is freed from the heavy traffic which pounds through it constantly'. Other benefits relate to the significant economic/employment opportunities that would arise.
- 5.224 In summary and when having regard to all of the public benefits, it is considered that on balance these outweigh the harm caused to the significance of the heritage assets in accordance with paragraph 196 of the NPPF. Furthermore, it is considered that due regard has been had to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess (S66 of the P(LB&CA) Act 1990). The proposals are therefore considered to accord with Policy DM4.10 of the SNLP, Policy DC9 of the LSNP and the LSAAP.

- 5.225 In relation to archaeology, geophysical survey work and desk-based assessments have been carried out during the course of the application.
- 5.226 The Historic Environment Service have assessed the proposals and have confirmed that they are happy that the remainder of the archaeological mitigation can be achieved subject to a programme of archaeological mitigatory work to be submitted to and approved prior to the commencement of development. It is noted that at the time of writing, some of these works in relation to the bypass have started. As such and subject to appropriately worded planning conditions recommended by the Historic Environment Service, the proposals are considered acceptable.
- 5.227 In terms of environmental impacts as identified in the submitted ES, the assessment concludes that there would be adverse effects or harm to the heritage significance of most heritage assets outside the Long Stratton Conservation Area to the north and east, largely due to the new bypass and the development on the east side of the village. This would be during the construction period and before the mitigation measures are in place. Those heritage assets on the west side of the village and within the village would be much less affected by the development. Furthermore, the removal of heavy trunk road traffic from the village centre will have substantial benefits for the Long Stratton Conservation Area and the listed buildings.
- 5.228 Mitigation measures are proposed to reduce the negative impact on the heritage assets to the east and north of Long Stratton. The listed buildings in Stratton St Michael are the most affected by the development and as a result significant landscaping and landform changes are proposed around the bypass route to provide screening of both the noise and visual impact of the road and the residential development. This landscaping, planting, bunding and cutting continues along the entire bypass route mitigating the impact on the other properties also negatively affected to the east of Long Stratton and the farmhouses to the south.
- 5.229 Once the landscaping matures, it is predicted that there will be an overall beneficial impact on the cultural heritage of the area. This is because a large number of listed buildings will have benefitted substantially from the removal of the traffic from their immediate vicinity along the existing A140, including the Grade I listed Church of St Mary in Long Stratton. The mature landscaping will also mitigate most of the negative impacts of the development with only the Church of St Michael and Nos. 1 & 2 Church Lane in Stratton St Michael, and Rhees Green Cottage, continuing to suffer ongoing negative effects from the development. Overall, the development will be largely beneficial for the cultural heritage of the area as set out above.
- 5.230 Regarding impacts of the proposed development on archaeology and the proposed mitigation measures, these will not result in a significant adverse impact.

Residential amenity

- 5.231 Policy DM3.13 Residential amenity directs that development should not be approved if it would have a significant adverse impact on nearby residents' amenities or the amenities of new occupiers.
- 5.232 The outline nature of the scheme means that it is not possible to undertake a detailed assessment of the scheme in respect of neighbour amenity with regard to light, outlook, privacy etc. However, it is evident from the submitted information that any reserved matters application could design a layout and house types which would prevent significant harm being caused in respect of the residential amenity.

- 5.233 With regards to the bypass, it is acknowledged that there will be a degree of impact on residential amenity, particularly to the nearest dwellings. However, the detailed proposals have been designed to minimise this by positioning the bypass in the least sensitive location, as well as providing landscaped buffers between the bypass and the edge of the proposed development and existing village. Notably, a Noise Assessment has been submitted with the application as part of the Environmental Statement which concludes that an acceptable relationship would be maintained between the proposed dwellings and the new bypass.
- 5.234 Presently traffic along the existing A140 generates high noise levels at properties to both the east and west sides of the road. The proposed bypass scheme would significantly reduce the traffic volume along the A140 to result in a reduction in traffic noise at some properties, immediately adjacent to the A140 road. However, a number of properties will experience an increase in noise level, most notably at Church Lane and a number of properties along Parkers Lane. To reduce noise impacts, mitigation options have been proposed as part of the bypass scheme, which include landscaping to provide noise barriers in the form of bunds along the bypass and reducing the speed of traffic along the section of bypass from Edge's Lane roundabout to the northern roundabout. Additional noise mitigation will also be secured as part of future reserved matters applications in respect to the detailed design and layout of housing to further reduce noise impacts.
- 5.235 In terms of the location of the mixed-use employment area, this is sufficiently separate from housing that an acceptable relationship can be maintained between the two uses, which will be subject to further consideration at the reserved matters stage.
- 5.236 The Council's Environmental Protection Team have been consulted on the application and have raised no objections with regards to the amenity of existing neighbouring properties or future occupants, subject to recommended conditions. As such and having regard to the design of the proposed development and mitigation options, which will be secured by conditions, it is considered that an acceptable relationship can be maintained between existing and proposed dwellings, employment areas and the bypass, thereby complying with requirement of Policy DM3.13 of the SNLP.
- 5.237 In terms of environmental impacts as identified in the submitted ES, the assessment shows that the proposed development will introduce new sources of light into a relatively dark area of low district brightness although there are existing sources of obtrusive light from the surrounding roads and land uses. The residual effects on residents with distant views of the applications site, on road users of the nearby road network, on heritage assets and light sensitive ecology receptors are identified as not significant during both the site preparation and construction, and operation phases. During construction, measures to mitigate significant effects from the artificial light will be secured through pre-construction planning conditions as noted in this assessment to prepare a Construction Environment Management Plan (CEMP). With these mitigation measures in place, residual effects from artificial lighting during construction have been assessed as Minor Adverse.
- 5.238 During operation, measures to mitigate significant effects from artificial light are to be secured through conditions. The bypass and roundabouts will not be lit, with the exception of signage. With these mitigation measures in place, residual effects from artificial lighting during operation have been assessed as not significant for visual or residential amenity.
- 5.239 With regards to air quality, there are potential construction impacts from dust emissions as a result of earthworks and construction activities. It is considered that the use of good practice control measures as part of the recommended CTMP would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.

- 5.240 Potential impacts during the operational phase of the proposed development may occur due to road traffic emissions, as well as introduce a new emission source in the form of the bypass. Modelling has been undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the local highway network which indicated that predicted air quality impacts as a result of traffic generated by the development were not significant at any sensitive locations.
- 5.241 In terms of noise, the proposed bypass scheme would significantly reduce the traffic volume along the A140. This is a moderate beneficial effect of the bypass scheme. As noted above and as a result of the bypass and WRR schemes, a number of properties will experience an increase in noise level which will result in minor to major adverse effects to isolated properties. Mitigation has been developed to minimise the effects of the bypass scheme. These include landscaping forms to provide noise barriers in the form of bunds along the bypass and reducing the speed of traffic along the section of bypass from Edge's Lane roundabout to the northern roundabout, and will be secured by means of conditions of planning permissions.

Housing mix and affordable housing

- 5.242 Policy DM3.1 of the SNLP and Policy 4 of the JCS requires all housing proposals to help contribute towards the delivery of a range of house types and sizes to meet the requirements of different households. Policy SC1 of the LSNP states housing proposals will be supported where they incorporate a significant proportion of two and three bedroom dwellings. Appropriate regard shall also be had to meeting the needs of entry level purchasers on low and medium incomes, and older people through accessible, adaptable general needs housing.
- 5.243 Policy SC3 of the LSNP states that the size and tenure of affordable homes should be specifically tailored to contribute towards Long Stratton's affordable housing needs. It also goes on to say that a meaningful proportion will be prioritised for those residents with a close connection to Long Stratton and that applicants will be expected to refer to the Long Stratton Housing Needs Assessment.
- 5.244 With regards to the mix of affordable housing, the Council's Housing Enabling Team has assessed the proposals and following discussions with the applicant, has agreed a preferred mix of affordable homes across the site based on 60% Affordable/Social Rented Housing and 40% Intermediate Housing, which includes discount market dwellings, shared ownership and shared equity dwellings, first homes or rent to buy (or as otherwise agreed by the Council in writing).
- 5.245 In terms of the precise mix by type and tenure, this will be agreed at Reserved Matters stage on a phase by phase basis. Each phase will require an Affordable Housing Scheme, which must be approved by the Council. The Council's Housing Enabling Team will seek to ensure that the mix type and precise tenure (within the specified 60/40 split) meets identified housing need.
- 5.246 The total number of dwellings proposed is 1,875 units across both applications (1,275 east of the A140 plus 600 west of the A140. Applying the 14.13 percentage (as discussed below) the number of affordable homes will be 265 (159 for rent and 106 affordable ownership).
- 5.247 Turning to the number of affordable homes proposed, Policy 4 of the JCS requires the development to deliver 33% of the overall number of homes as affordable housing, which reduces to 28% when applying the more up to date SHMA. The policy goes on to state that the proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions.

- 5.248 Having regard to this, the applicants have submitted a viability assessment, which sets out the values generated by the development against the development costs to determine the overall percentage of affordable housing being offered.
- 5.249 In order to validate the assessment, the Council instructed an independent viability consultant CP Viability to review the findings of the applicant's viability assessment in April 2021. Further to our initial viability review and subsequent discussions, the applicant submitted a final updated appraisal dated 5th December 2022 which the Council reviewed in the report from CP Viability dated 16 January 2023.
- 5.250 The report from CP Viability has been carried out in accordance with the national Planning Practice Guidance and has looked at comparable property prices within the area and in specific detail at the build costs of the project as well as other multiple inputs.
- 5.251 The applicant's initial appraisal (which itself was updated from an earlier version) concluded that the scheme was able to deliver 10% onsite affordable housing. The Council's own assessment was that the scheme could deliver 33% affordable housing. It should be noted that a key driver for the difference between the applicant's conclusion and that reached by the Council was due to how land value was assessed within the appraisal.
- 5.252 The applicant's appraisal was subsequently updated following discussions with the Council, which concluded that 15% onsite affordable dwellings could be delivered, in addition to a contribution towards the £4,500,000, an open space contribution and a CIL payment.
- 5.253 The Council provided a response to these offers in a letter from the Council's viability advisor dated 4th March 2022, to conclude that we considered the scheme could provide a minimum of 21.65% onsite affordable housing when taking into account adjustments in the land value (deemed necessary following receipt of further information / evidence from the applicant). On this basis, the Council was not able to agree to the suggested offer of 15% onsite affordable housing at the time.
- 5.254 A further updated viability appraisal was submitted by the applicant on the 5th December 2022 (plus additional supporting evidence from Savills on 11th January 2023) which included updated costs and increased planning costs for public open space and off-site highway works relating to Long Stratton town centre. This resulted in an updated offer of 11% affordable housing.
- 5.255 Following further discussions with the applicants and their advisors, the Council has reviewed the findings of the applicants updated viability assessment in the report from CP Viability dated 16 January 2023 to conclude that the development is able to deliver 14.13% onsite affordable housing, subject to a clawback mechanism which is set out below.
- 5.256 This position was finally agreed between the applicant and the Council and is based on adopting a more cautious approach to market values given the current uncertainty in the housing market, as well as the fact that this is a largely untested location for new build dwellings as detailed in the report from CP Viability. This also included an adjusted land value, to reflect the additional information / evidence submitted by the applicant.
- 5.257 In terms of the clawback, this comprises of two main mechanisms to be secured in the S106. The first part requires an analysis to be carried out by the developer at 25% occupation of each phase, to determine whether the build costs and sales receipts associated with the development, results in any increase in profit.

- 5.258 In the event that the analysis shows a surplus profit above the agreed amount in the submitted viability report, then additional Affordable Housing will be required on that phase above the required amount of 14.13%, but up to 23%. The developer will then be required to submit a further affordable housing scheme for that phase incorporating the additional affordable housing and not to occupy more than 50% dwellings until the additional affordable housing has been constructed in that phase.
- 5.259 The second part of the clawback requires a further analysis to be carried out at 75% occupation of each phase with any surplus profit above an agreed amount to be shared between the applicant and the Council on a 50% to 50% split being paid as a financial contribution towards affordable housing.
- 5.260 Substantive matters are now resolved regarding the assumptions and inputs to be included in the review mechanism (to ensure that this is an appropriate basis to recover an uplift in the viability.) and this will be finalised in the final drafting of the S106.
- 5.261 On this basis it is therefore recommended that in order to deliver the development, the affordable housing requirement comprises of 14.13% onsite affordable housing. Notwithstanding this, it is recommended that the clawback mechanism outlined above is included within the S106. This would allow for a re-examination of the scheme at each phase of the development should market conditions improve and the scheme was to be more viable than expected. Subject to the inclusion of the above the proposal is considered to accord with the requirements of JCS Policy 4, the NPPF and the Government's Guidance on Viability.

Healthcare

- 5.262 Paragraphs 92 to 103 of the NPPF relate to the promotion of healthy and safe communities. These paragraphs include the consideration of a wide range of matters that contribute to achieving healthy, inclusive and safe places. Paragraph 96 refers to public services, stating that to ensure faster delivery of other public service infrastructures such as hospitals local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.
- 5.263 The adopted development plan for Norwich comprises the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk and Norwich's Site Allocations and Development Management plans.
- 5.264 The JCS at policy 7 recognises that health infrastructure will need to be provided to support growth and requires Health Impact Assessments to be undertaken when large-scale housing developments are proposed. These assessments consider the effect on health and social care services along with how the development supports healthy lifestyles and related factors such as crime, social cohesion air pollution etc. Policy 4 of the JCS indicates that provision will be made for the expansion of the Norfolk and Norwich University Hospital (NNUH) to meet the needs of growing communities and healthier lifestyles will be promoted by maximising access by walking and cycling and providing opportunities for social interaction and greater access to green space and the countryside.
- 5.265 The Greater Norwich Authorities operate CIL which is allocated through the Infrastructure Investment Fund. Healthcare is not infrastructure identified in the Greater Norwich CIL Charging policy and contributions from CIL therefore cannot be sought from health providers.

- 5.266 S106 obligations are used to mitigate the direct impacts of a development proposal and make it acceptable in planning terms. Obligations may only constitute a reason for granting planning permission for the development if they meet all three of the statutory tests set out in Regulation 122 of the CIL Regulations 2010:
1. necessary to make the development acceptable in planning terms;
 2. directly related to the development; and
 3. fairly and reasonably related in scale and kind to the development
- 5.267 A Health impact assessment has been submitted in support of the planning application which recognises that local provision in terms of GP practices is currently good with all GP practices identified in this assessment accepting new patients. However it recommends that the developer works with NHS Norfolk and Waveney Clinical Commissioning Group to determine an appropriate contribution to developing local health services in the area when the future resident population can be estimated with greater accuracy.
- 5.268 NHS England position is that new development should contribute to the cost of expanding and building new infrastructure and investing in new facilities, which they indicate is required as a result of the development.
- 5.269 NHS England have indicated that there is insufficient capacity at Long Stratton Medical Practice to accommodate the population growth from the development and cumulative development in the area. It advises:

“The proposed development is likely to have an impact on the services of 1 GP practice and its branch surgery, operating within the vicinity of the application site. The GP practice does not have capacity for the additional growth resulting from this development and cumulative development in the area. The proposed development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated.”

Para 5.1 of NHS England comment states:

“The development along with planning application 2018/0112 would give rise to a need for improvements to capacity, in line with CCG Estates Strategy; by way of an extension for the benefit of the patients at Long Stratton Medical Practice; a proportion of the cost of which would need to be met by the developer. Additionally three number new GPs are required at an average recruitment cost of £10,000 per GP, therefore £30,000 is also needed as mitigation (£20,000 for 2018/0111 and £10,000 from 2018/0112.”

- 5.270 NHS England indicate in this 2018 response that there was 122.51sqm capacity at the surgery; 262.12sqm floorspace required to meet the proposed growth from the development; and based on a formula applied by them this equates to £602,945 for 2018/0111 and 2018/0112 combined.
- 5.271 The Council accepts that there can be a localised impact on primary health care premises (GP Surgery) as a direct impact population growth has on a practice list size and premises requirements.

- 5.272 It is noted however that the comments from NHS England date back to 2018 and since this time the Clinical Commissioning Groups (CCGs) have been replaced by Integrated Care Boards (ICBs) which may change the substantive comments on health care impacts identified. Furthermore it is evident since those 2018 comments, the medical practice has secured planning permission granted 16 September 2022 (2022/1482) for an extension to the building and carparking within the site which includes 7 additional consulting rooms. The NHS have been re-consulted a number of times on revised proposals however have not provided any further comments and there is likely therefore be a degree to which those comments are out of date in considering the capacity of that surgery and therefore NHS assessment of the localised impact. Furthermore this impact and mitigation sought needs to be considered in light of the recent Leicester NHS Trust v Harborough District Council High Court judgement where it was held that an NHS contribution was not Reg 122 compliant because the NHS Trust was unable to demonstrate that there would be a funding gap for the provision of health services attributable to the occupation of housing on the site. For the contributions currently being sought to be Regulation 122 compliant, NHS England will now need to satisfy the Council that the applications create a localised impact and that the contribution sought would mitigate this impact. As discussed further below, if NHS England can demonstrate that the contribution is CIL compliant, in light of the viability constraints on the development, whether a contribution can be secured will need to be weighed up against the other contributions being sought.
- 5.273 NHS England and the ICB have therefore been re-consulted on the application specifically seeking an update on their comments to address the above matters.
- 5.274 It should also be noted that subject to the comments of NHS England/ICB the Council needs to consider as a matter of judgement as to whether the three tests in reg.122(2) of the CIL Regulations 2010 are satisfied and whether it would be appropriate to require a financial contribution to be made, after taking into account other requirements and any impact on the viability of the scheme
- 5.275 As has been set out elsewhere in this report (viability) the scheme is not viable when accounting for all other planning policy requirements and a significant reduction in planning obligations has been negotiated on the basis of a Viability Assessment. Having regard to viability (which the Council affords significant weight) therefore, notwithstanding what the extent of the contribution sought from NHS England is, the scheme is not viable and it is therefore likely to be difficult to secure a healthcare contribution also having regard to other planning obligations to be secured (which are afforded a greater weight -affordable housing; highway and travel impacts; social infrastructure to support the development and healthy lifestyles).
- 5.276 To conclude, Officers are seeking an update from NHS England and the Integrated Care Board (ICB) on their assessment of health impacts and any mitigation sought from the development. However it is evident having regard to the viability of the scheme and other obligations necessary to secure (which have already been compromised) that the Council is unlikely to be able to secure health care contributions from the development. Officers are therefore seeking delegated authority to resolve and materially consider the identified impacts having due regard to the viability of the scheme.

Norfolk Constabulary

- 5.277 Norfolk Constabulary have identified that this application in combination with application ref 2018/0112, will place additional pressure on police resources. To address this, further investment has been requested to enhance provision and infrastructure. In terms of police resources, there is a range of infrastructure and capital costs including new build facilities and extensions and adaptations to existing police stations. Norfolk Constabulary have not identified a need for new build facilities or significant extension to existing buildings, but consider that a contribution of £50

per dwelling would be an appropriate level to be secure by s106 agreement (or CIL). The Council considers that the contributions do not meet the tests within Regulation 122 of the Community Infrastructure Regulations (CIL) as they do not provide sufficient evidence to support its position. As such it is considered that further investment in terms of policy resources, which is not an agreed position with the Norfolk Constabulary, should be explored outside of this application.

Sustainable construction/renewable energy

- 5.278 Policy 1 and 3 of the JCS require the sustainable construction of buildings and water conservation in addition to requiring 10% of the predicted energy requirements to be delivered by on site decentralised and renewable or low carbon energy. Furthermore, electric vehicle charging points and energy supply will be required as part of new Building Regulations. Precise details of how the proposed development would comply with the policy requirements set out above could be secured by condition, however, it is expected that the development would meet, and most likely even exceed, the prescribed sustainability measures.

5 year housing land supply (5YHLS)

- 5.279 With regards to the land supply position, the Council currently has less than 5 years of deliverable sites.
- 5.280 Whether or not the tilted balance at paragraph 11dii is engaged is dependent on whether the impacts on Protected sites (nutrient neutrality) are addressed i.e are they are policy of the NPPF that otherwise directs refusal. However the benefits to housing delivery in the circumstance of no 5YHLS is afforded significant weight. It is also evident in this case that the site is delivering housing against an adopted allocation and as set out later in the report in the planning balance, any adverse impacts are outweighed by the benefits.

Developer Contributions

- 5.281 Developer contributions are highlighted throughout this report and will be secured through the S106 and the payment of CIL in terms of the planning obligations required to make this development acceptable. The S106 secures contributions toward the delivery of the bypass, a travel plan contribution, a contribution towards enhanced cycle/pedestrian routes along the A140, contributions for skylark mitigation, and a Recreational Avoidance Mitigation contribution. The S106 will also secure the following planning obligations: affordable housing and review mechanism, serviced land for the school site, serviced community land, off site hedging to mitigate the loss of habitat for the yellowhammer, open space and green infrastructure and self-build dwellings.

Environmental Impact Assessment

- 5.282 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.

The topics included in the Environmental Statement is set out earlier in the report.

- 5.283 As part of my assessment officers have considered and assessed the direct and indirect significant effects of the proposed development on the following factors:
- (a) population and human health;
 - (b) biodiversity, with particular attention to species and habitats protected under EU Directive
 - (c) land, soil, water, air and climate;
 - (d) material assets, cultural heritage and the landscape; and

(e) the interaction between the factors referred to in sub-paragraphs (a) to (d); and
(f) cumulative impacts

- 5.284 The operational effects of the proposed development have been considered where appropriate, and any significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.
- 5.285 The residual impacts arising from the proposed development - as amended - range from major beneficial to, at worse, major/moderate adverse. The majority of impacts are negligible or not significant, with moderate or major adverse impacts relating to heritage assets as noted in the above assessment (Church of St Michael and Nos. 1 & 2 Church Lane at Stratton St Michael, and Rhees Green Cottage) and some minor to major adverse changes relating to changes in noise of some properties typically in existing quieter locations with the bypass, which will be the subject to mitigation. Many of the adverse impacts are short-term and temporary in nature with most being reduced in their significance with time and as the effectiveness of the mitigation measures are put in place to manage and reduce these impacts.
- 5.286 For this reason, taking into account proposed mitigation measures it has been demonstrated that - where possible and through the design evolution of the proposals - potential significant environmental effects have been avoided in the first instance. Where this is not possible the potential environmental effects have been reduced through mitigation. This has resulted in the Proposed Development, which has regard to minimising its environmental effects and delivering a sustainable form of development.

Equalities Impact Assessment

- 5.287 Under section 149 of the Equality Act 2010, the Council has had due regard to the impacts of this proposal, in respect of layout, design and connectivity, on those groups with protected characteristics.
- 5.288 In the development of major new infrastructure, such as the proposed bypass, it is important to consider both the current and future needs of all users, including cyclists, pedestrians and groups with protected characteristics. As part of the detailed design of the bypass, consideration has been had to the route of the bypass which crosses existing public rights of way and ensuring that these are not severed and crossings are accessible. When having regard to the Act it is considered that the benefits of this proposal outweigh the negative impacts such as diversions of footpaths crossing the proposed bypass. In terms of the outline components of the proposals, these will be further assessed at reserved matters stage in respect to the Equality Act 2010.

Local Finances

- 5.289 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.

CIL

- 5.290 This application is liable for Community Infrastructure Levy (CIL).

GIRAMS & Appropriate Assessment

- 5.291 This application is liable for Green Infrastructure Recreational Avoidance Mitigation Strategy (GIRAMS) tariff. This quantifies the recreational impact from development on the Protected Sites (SAC and SPA) and is an appropriate basis on which to measure impact and appropriate mitigation.

- 5.292 Nonetheless, as the proposed development would deliver sufficient on-site open space to meet the necessary green infrastructure standards, it is not necessary to seek a contribution towards off-site green infrastructure (the GI element of the tariff).
- 5.293 As set out within the ecology section of this report, a RAMs contribution would be sought and secured through the S.106.
- 5.294 Therefore when taken together it is considered that the proposed mitigation, in so far as it relates to the recreational impacts of the development only, adequately addresses the direct impacts of the development on the integrity of the Protected Sites (SPA and SAC) and accordingly the Council as the Competent Authority can satisfactorily conclude that there will be no likely significant effects and the application can safely be determined with regards the Conservation of Species Habitats Regulations 2017 (as amended).
- 5.295 It should be noted that the integrity of the Protected sites having regard to impacts on nutrients is still outstanding and the Council's Appropriate Assessment will need to consider any in combination effects of the recreational impacts and the nutrients impacts. This will be completed inline with the outstanding nutrient neutrality matters.

6. Conclusion

- 6.1 The site forms part of the land allocated for residential development and a bypass in the Long Stratton Area Action Plan (LSAAP) forming part of the Council's Development Plan.
- 6.2 Key to the allocation policy is the delivery of the bypass alongside the housing and it is evident that the ability to deliver the bypass is made possible through the public/private sector partnership in regards to funding. The bypass scheme will be delivered by Norfolk County Council subject to planning permission being granted, and currently has a construction duration of 18 months, programmed to commence in April 2024. The public sector funding is significant and enables the bypass to be delivered inline with Area Action Plan triggers which is proposed to be secured by condition.
- 6.3 Notwithstanding the public sector funding secured for the bypass, there is a significant shortfall in the viability of the scheme resulting in a reduction in obligations required by planning policies including affordable housing, travel planning, works to improve pedestrian and cycle connectivity in Long Stratton.
- 6.4 On balance having regard to the viability appraisal conducted it is considered that the scheme meets the requirements of Policy 4 of the JCS on the basis of the Council's negotiated position to achieve 14.13% (265 units across both 2018/0111 and 2018/0112) onsite affordable housing and importantly a clawback mechanism secured as outlined above to allow for a re-examination of the scheme at each phase of the development should market conditions improve.
- 6.5 The works to deliver connectivity from the development to the existing settlement is a negotiated sum having regard to viability and having regard to the significant weight afforded to the delivery of the bypass, on balance officers consider in this circumstance this to be an acceptable contribution.
- 6.6 There are outstanding matters in respect of the impact on health and officers are seeking delegated authority to resolve this matter, although on the basis of an already significantly compromised position in regards to viability.
- 6.7 The Environmental impacts of the development, including cumulative impacts, have been assessed within this report and officers consider that the impacts of the proposed development remaining after mitigation has been implemented, which range from major beneficial to major/moderate adverse, have been adequately assessed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

- 6.8 While a mitigation scheme has recently been submitted with regards to Nutrients neutrality, the assessment of this by the Council (as competent authority) and Natural England as the statutory consultee is pending, however resolution of this is recommended to be delegated to officers to reach a final conclusion on the Appropriate Assessment.
- 6.9 As can be seen in the above assessment officers consider that the scheme complies with the requirements of the policies when taken as a whole (the Long Stratton Area Action Plan Allocation policy and all other relevant policies of the Long Stratton Neighbourhood Plan, the Development Management Policies Document, Joint Core Strategy) and the NPPF and would represent a sustainable form of development subject to resolution of the final outstanding matters.
- 6.10 On the basis of the above, delegated authority is therefore sought for the Assistant Director of Planning to approve subject to a S106 and the imposition of conditions necessary to make the development acceptable as set out in the report and any further conditions necessary at the discretion of officers in completing any decision and resolving the following key issues:
- Open space phasing
 - Nutrient neutrality
 - Drainage matters from the LLFA
 - Re-consultation with the Integrated Care Board (ICB) in respect of the identified impacts on health and in particular the impact on Long Stratton Medical Practice

Recommendation : To authorise the Assistant Director of Planning to approve subject resolution of outstanding planning matters; to the satisfactory completion of a S106 legal agreement; and the imposition of conditions necessary to make the development acceptable as set out in the report and any further necessary at the discretion of officers in completing any decision.

Outstanding matters

Nutrient Neutrality - Consideration of the revised Nutrient Neutrality mitigation and shadow Appropriate Assessment received from the applicant, consultation with Natural England relating to Habitats Regulations in respect of Nutrient Neutrality to inform the Council as Competent Authority and the Council being satisfied as Competent Authority that the likely significant effects of the development on the integrity of the site and its conservation objectives together with mitigation for the adverse effect on the integrity of the site are adequately addressed and secured.

Surface water drainage - Resolution of final matters relating to surface water drainage and receiving no substantive objection from the Lead Local Flood Authority and the imposition of any further conditions necessary.

Re-consultation with the Integrated Care Board (ICB) in respect of the identified impacts on health and in particular the impact on Long Stratton Medical Practice

Satisfactory completion of a S106 legal agreement to cover:

- Contributions towards delivery of the bypass
- Travel plan contribution
- A contribution towards enhanced cycle/pedestrian routes along the A140
- Contributions for skylark mitigation
- Affordable housing at 14.13%
- A review mechanism for affordable housing by phase
- Serviced land for the school site
- Serviced community land
- Off site hedging to mitigate the loss of habitat for the yellowhammer
- Open space and green infrastructure (quantum and phasing)
- Self build dwellings
- GIRAMS contribution regarding recreational pressure on Protected Sites
- Monitoring fees

Noting substantively the main elements are agreed however final detailed considerations to be delegated to officers to enable the S106 to be concluded

Suggested conditions:

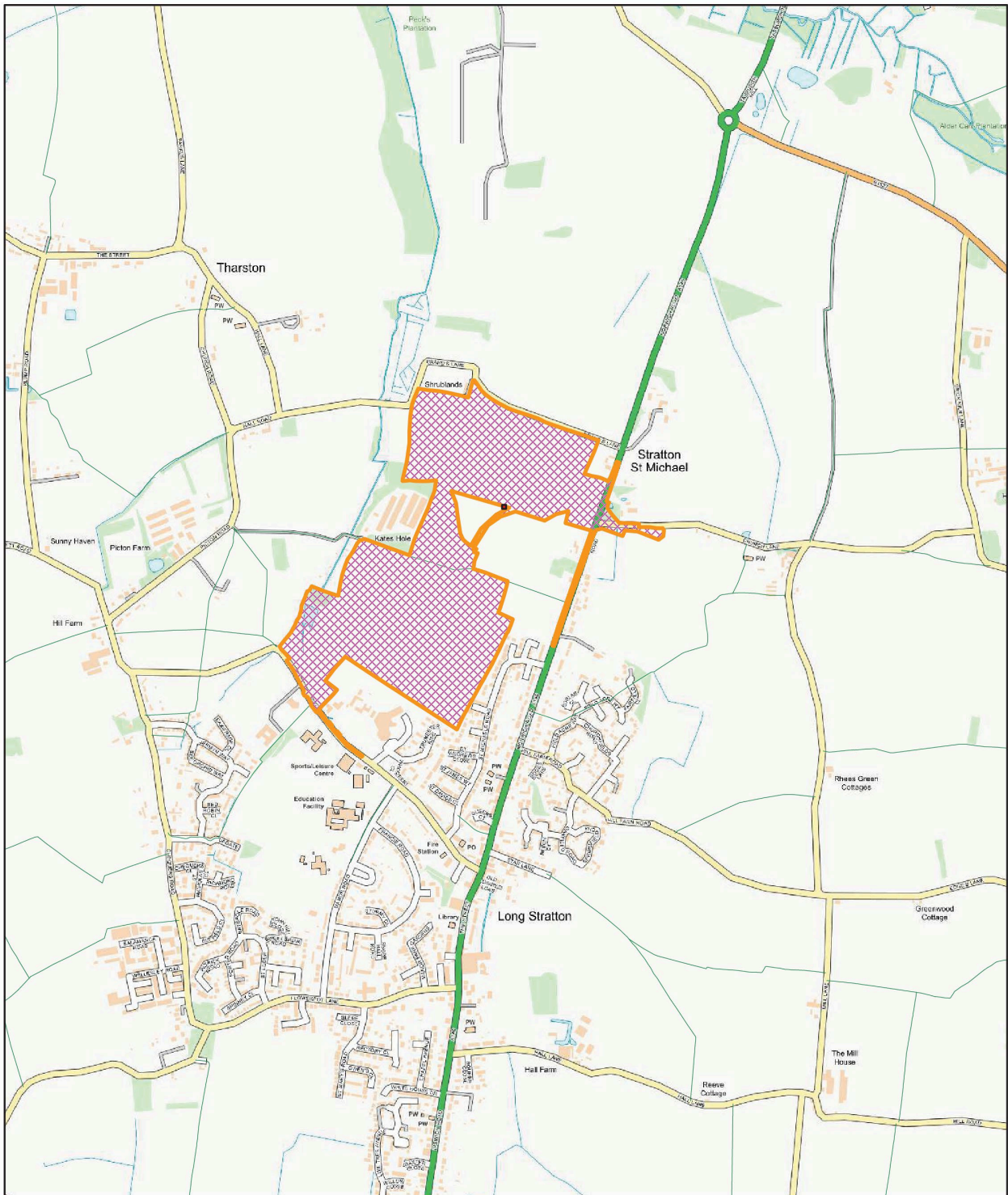
Time Limit for outline and full permission
 Time limit for reserved matters
 Submission of reserved matters
 In accordance with submitted drawings
 Design Code
 Surface water drainage scheme
 Detailed design of the long-term wetland mitigation strategy
 Foul water drainage scheme
 Detailed highway plans
 Compliance with highway details
 Roads constructed to binder course surfacing level
 Details of on-site parking for construction workers
 Construction Traffic Management Plan and Access route
 Details for the Long Stratton Bypass and completed prior to the 250th occupation of the development
 Detail of off-site highway improvement works and implementation
 No direct vehicular or pedestrian access from or onto Hall Lane, Star Lane or Edges Lane until details approved
 Travel Plan
 Infrastructure Phasing Plan
 Marketing and delivery of the employment land
 Housing with Care scheme
 Self-build housing
 Lighting Design Strategy
 Construction Environment Management Plan for Biodiversity
 Landscape and Ecological Management Plans
 Biodiversity mitigation and enhancement measures
 Biodiversity Method Statement
 Biodiversity Net Gain Audit
 Dark Corridors
 Lighting design strategy for biodiversity
 Further ecological surveys

Submission of a copy of the Protected Species licence
Contamination investigation and risk assessment
Unidentified contamination
Noise Assessment
Implementation of noise remediation scheme and validation
Odour Assessment
Implementation of changes to the masterplan or approved odour
remediation scheme and validation
Lighting for residential amenity
Construction impacts and Management Plan
Contamination
Imported topsoil and subsoil evaluation
Archaeological written scheme of investigation and mitigation
Renewable energy
Water efficiency
Materials
Landscaping scheme, including boundary treatments and site levels
Landscaping scheme implementation
Soft and Hard Landscaping Strategy
Compliance with AIA, including TPP and AMS
Fire hydrants
Nutrient Neutrality
Bypass related conditions

Informative notes where needed including attention for the need for
land drainage consent

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2018/0112



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South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU Tel (01508) 533633

2. Application No : 2018/0112/O
Parish : LONG STRATTON & THARSTON

Applicant's Name: Norfolk Homes Ltd
 Site Address Land west of the A140 Long Stratton Norfolk
 Proposal Hybrid Application on 40.8 hectares of land to the west of the A140 seeking outline planning permission for 387 no. dwellings and 1.5 hectares of Class B1 employment land, associated infrastructure and public open space. Together with application for full planning permission for a western relief road (including a roundabout access at the north to the A140 and a priority junction access to Swan Lane at the south) and with phase 1 housing consisting of 213 no. dwellings, associated infrastructure and public open space.

Reason for reporting to committee

At the request of the Assistant Director Planning due to the strategic nature and scale of the application.

Recommendation summary:

To authorise the Assistant Director of Planning to approve subject to a S106 and the imposition of conditions necessary to make the development acceptable as set out in the report and any further conditions necessary at the discretion of officers in completing any decision and resolving the following key issues:

- Affordable housing review mechanism
- Open space phasing
- Nutrient neutrality
- Noise and odour matters relating to Banham Poultry
- Drainage matters from the LLFA
- Re-consultation with the Integrated Care Board (ICB) in respect of the identified impacts on health and in particular the impact on Long Stratton Medical Centre

1 Proposal and site context

- 1.1 The application is accompanied by an Environmental Statement submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and has been advertised as such. The residual impacts arising from the proposed development as amended, are detailed in the submitted Environmental Statement and concluded at the end of this report.

The Proposed Development comprises two concurrent 'hybrid' applications for planning permission as follows:

- 1.2 *Land West of the A140: Land West of the A140: Hybrid Application on 40.8 hectares of land to the west of the A140 seeking outline planning permission (access only for consideration) for 387 no. dwellings and 1.5 hectares of Class B1 employment land, associated infrastructure and public open space. Together with application for full planning permission for a western relief road (including a roundabout access at the north to the A140 and a priority junction access to Swan Lane at the south) and with phase 1 housing consisting of 213 no. dwellings, associated infrastructure and public open space. (reference 2018/0112)*
- 1.3 *Land East of the A140: Hybrid Application on 131.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 no. dwellings, 8 hectares of employment land for uses within Classes B1, B2 and B8, 2-hectare primary school site, community facilities site,*

associated infrastructure and public open space. Together with application for full permission for a bypass including roundabouts and junctions. (reference 2018/0111).

- 1.4 By way of background the applications were submitted in February 2018 and held in abeyance between early 2019 and May 2021, pending the completion of work in relation to a bid for Major Road Network funding to the Department for Transport, to help facilitate the delivery of the Long Stratton bypass. Norfolk County Council's revisions to the design of the bypass and associated infrastructure have since been introduced to this planning application, and the application amended correspondingly.
- 1.5 Since then, amendments have also been made to address comments arising from consultation and discussion with the applicants and consultees, including Town and Parish Council's, forming part of the consultation process.
- 1.6 This planning application is for land West of the A140 (ref 2018/0112) and comprises of the following key components:

Outline planning permission (access only for consideration at this stage) for:

- 387 dwellings, including affordable housing;
- 1.5 hectares of B1 employment land;
- Community land site;
- Associated infrastructure and public open space.

Full planning permission for:

- Western relief road (including a roundabout access at the north to the A140 and a priority junction access to Swan Lane at the south)
- 213 dwellings, including affordable housing;
- Associated infrastructure and public open space.

- 1.7 It is intended that the two hybrid applications are linked by a shared S106 reflecting the shared infrastructure necessary for the overall AAP.
- The Application Site is allocated for development identified under Policy LNGS1 of the Long Stratton Area Action Plan (LSAAP), forming part of the South Norfolk Development Plan. An area of land comprising 4.6 Hectare of land forming part of LNGS1 on the west side between Phase 2 and Phase 3 to the west of the A140 is excluded from this application to be retained as agricultural land, identified as 'Potential Future Development Land' on the masterplan.
 - The application site itself has an area of approx. 40.8 hectares of arable farm land and is located to the north-east, east and south-east of the A140 and village of Long Stratton. The site is bounded on its northern edge by Brand's Lane, and its southern edge by Swan Lane. To the east lies the valley of the Picton Stream, the Long Stratton Water Recycling Centre and a group of agricultural buildings.
- 1.8 The A140 is a single carriageway road and is characterised by commercial and residential frontage and provides a strategic link running between the A14 to the south and the A47 to the north.
- 1.9 network of footpaths and cycleways connect and surround the site including existing local lanes, tracks and footpaths, which connect Long Stratton and Tharston with the wider network of Public Rights of Way.
- 1.10 Long Stratton Conservation Area (CA) is located between the two application sites. This site (west) lies just northwest of the northern end of the conservation area which encompasses the central core of the village, running north-south along the high street (the A140). Long Stratton Conservation Area contains 54 buildings on the statutory list of 'Buildings of Special Architectural or Historic Interest', including a Grade I (the Church) and two Grade II* listed buildings, all of which are within close proximity to the site.

- 1.11 Landscaping is proposed within and around the site, including new woodland planting, open areas with wildflower grassland, green infrastructure and general open space and surface water drainage features (SUDs) such as attenuation ponds and swales.
- 1.12 Access is proposed via a new link road, described as the western link road, comprising a roundabout access at the north to the A140 and a priority junction access to Swan Lane at the south.
- 1.13 The application is accompanied by an Environmental Statement submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and has been advertised as such.

The Environmental Statement (ES) as amended covers the following environmental impacts:

- 1.14 This ES document comprises 19 chapters, which provide an assessment of the identified environmental topics, comprising Chapter 1: Introduction; Chapter 2: Methodology; Chapter 3: Site and Planning Policy Context; Chapter 4: Proposed Development; Chapter 5: Society and Economy; Chapter 6: Lighting; Chapter 7: Biodiversity; Chapter 8: Climate Change and Energy; Chapter 9: Landscape and Visual; Chapter 10: Traffic and Transport Chapter; 11: Air Quality Chapter; 12: Noise and Vibration; Chapter 13: Hydrology/Flood Risk/Water Resources; Chapter 14: Cultural Heritage; Chapter 15: Archaeology Chapter; 16: Soils and Agriculture; Chapter 17: Ground Conditions and Contamination; Chapter 18: Cumulative Assessment; and Chapter 19: Conclusions.
- 1.15 The residual impacts arising from the proposed development as amended, are detailed in the submitted Environmental Statement and are addressed in the relevant sections of the report and concluded at the end of this report.

2. Relevant planning history

- 2.1 2018/0111 Land East of the A140: Hybrid Application on 131.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 no. dwellings, 8 hectares of employment land for uses within Classes B1, B2 and B8, 2-hectare primary school site, community facilities site, associated infrastructure and public open space. Together with application for full permission for a bypass including roundabouts and junctions.

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 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 9 : Strategy for growth in the Norwich Policy Area
 Policy 10 : Locations for major new or expanded communities in the Norwich Policy Area
- 3.3 **South Norfolk Local Plan Development Management Policies (SNLP)**
 DM1.1 : Ensuring Development Management contributes to achieving sustainable development in South Norfolk
 DM1.2 : Requirement for infrastructure through planning obligations
 DM1.3 : The sustainable location of new development
 DM1.4 : Environmental Quality and local distinctiveness
 DM3.1 : Meeting Housing requirements and needs
 DM3.8 : Design Principles applying to all development
 DM3.11 : Road safety and the free flow of traffic
 DM3.12 : Provision of vehicle parking
 DM3.13 : Amenity, noise, quality of life
 DM3.14 : Pollution, health and safety
 DM3.15 : Outdoor play facilities/recreational space
 DM4.2 : Sustainable drainage and water management
 DM4.4 : Natural Environmental assets - designated and locally important open space
 DM4.8 : Protection of Trees and Hedgerows
 DM4.9 : Incorporating landscape into design
 DM4.10 : Heritage Assets
- 3.4 **Site Specific Allocations and Policies**
- Long Stratton Area Action Plan (AAP)**
 LNGS1: Land East, South-East and North-west of Long Stratton
 LNGS2: Town Centre Policy
 LNGS5: General Green Infrastructure Requirements for New Developments within Long Stratton AAP Area
 LNGS7: New Recreational Provision in Long Stratton
 LNGS9: Accessibility
- 3.5 Long Stratton Neighbourhood Plan (LSNP)
 SC1: Housing Mix
 SC2: Specialist and Supported Housing
 SC3: Affordable Homes
 SC4: Pedestrian and Cycle-friendly Neighbourhoods
 SC5: Maintaining Good Connectivity with Outlying Areas
 SC6: Location of New Community Facilities
 DC7: Landscape and Settlement Character
 DC8: Creating Successful Neighbourhoods
 DC9: Strengthening and Enhancing Long Stratton's Historic Core
 DC10: Long Stratton Design Principles
 TC13: Re-establishing The Street as the Heart of the Town
 GI16: Long Stratton Recreational Open Space Standards
 GI17: Delivering Green Infrastructure in Long Stratton
 GI18: Green Infrastructure Management
 GI19: Protecting Existing Sites of Biodiversity Value in the Plan Area
 R20: Delivering a New Community Meeting Space in long Stratton
 C22: Fibre to the Premises

3.6 Supplementary Planning Documents (SPD)

South Norfolk Place Making Guide
Guidelines for Recreation Provision in new Residential Development

Statutory duties relating to Listed Buildings, setting of Listed Buildings and Conservation Areas:

S66(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, 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.

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 (summarised)

4.1 Long Stratton Town Council

Comments on originally submitted documents (03.04.2018)

- Proposals conflict with the environmental strategy and the transport policy within the Long Stratton Area Action Plan (LSAAP) - Numbers, 2,3 and 7 contradicts the environmental strategy and the transport policy within the LSAAP.
- Parish Council would like to raise concern over numbers 4, 9, 11 & 12. Parish Council noted numbers, 1, 5, 6, 8 and 10.

Comments on amended proposals (17.09.2021)

- Require further submissions from the applicants which demonstrates compliance with the Neighbourhood Plan notably:
- The needs of older people through accessible, adaptable housing as set out in Policy LSNP – SC1
- The inclusion of specialist and supported housing to meet the needs of the population set out in Policy LSNP SC2
- Affordable housing provision at a rate of 33% of the development including a meaningful proportion of affordable homes being delivered as part of market sites will be prioritised for those residents with a close connection to Long Stratton set out in Policy LSNP SC3. A close connection to Long Stratton is defined at paragraph 5.1.28 of the Neighbourhood Plan.
- A viability assessment which is NPPG compliant and a critical review by the District Council including an effective review date of any conclusions. The Town Council would suggest a review at each phase of development.
- A schedule of the Open Space Needs calculations using Figure 5.13 together with a schedule of how that Open Space is secured to ensure that the requirements are being appropriately met.
- S106 obligations to secure training for Long Stratton's local workforce to facilitate the delivery of skills training or apprenticeship schemes to the local people
- The development proposals should set out how S106 contributions will secure these interventions to improve public realm and the mechanisms and timescales for declassification of the A140 through Long Stratton.
- Outlines their compliance with the Long Stratton Design Guidelines particularly with reference to pedestrian and cycle connectivity, boundary treatments between existing communities and proposed new communities, road dimensions and vehicle access, vehicle parking solutions, architectural details and material palette and sustainable design.

- Objects to location of the Community Hub, Car Parking and School to the north of Star Lane.
- Objects to current provision and location of land for the Community Space.
- Concerned that the Sports Pitches provided in Development Parcel CH2 are separated from the community by the Link Road. Some concern that the football pitches are too close to the A140 and conflicts with Neighbourhood Plan Policy LSNP GI17.
- Town Council requires further analysis and discussion with the applicants to understand the assumptions on Open Space Contributions and whether this satisfies the requirements of Policy LSNP GI18.
- Neighbourhood Plan Policy LGNS 9 of the LSAAP requires that development maximises permeability for pedestrians and cyclists by improving access to/from existing and new key services and facilities.

Comments on amended proposals (15.03.2022)

- Overall LSTC do not object to the applications and welcome the opportunity to work with NH/NL to get the best for the local community, there is a lot of positive contributions such as open space provision and formal play areas however, more information is required as there are areas of concern.
- LSTC are concerned that the proposed sports pitches being beside the bypass will mean the school children using them will be inhaling harmful toxins.
- From last report objecting to the community hub location, NH/NL have addressed some of the reasons for the change of location, one being that if you have to change the topography to create sports pitches you can create problems elsewhere and the changed topography can take years to settle

4.2 Long Stratton Neighbourhood Plan Team

- No comments received.

4.3 Hempnall Parish Council

Comments on originally submitted documents (19.02.2018)

- Neither approve or refuse
- If approved, serious mitigation consideration should be given for the effect on Hempnall and surrounding villages
- Serious concerns of increased 'rat runs' through the Krons and Hempnall Street
- Suggest fewer roundabouts so new road functions as a free flowing bypass rather than distributor.

Comments on amended proposals:

- No comments received

4.4 Pulham Market Parish Council

Comments on originally submitted documents (12.03.2019)

- Neither object or support
- Serious concerns regarding impact of additional traffic generated, particularly traffic connecting to the A140 via Swan Lane
- Essential the bypass is built and new houses are supported by a new connection to the A140.

Comments on amended proposals:

- No comments received

4.5 Topcroft Parish Council

- No comments received

4.6 Woodton Parish Council

Comments on originally submitted documents (16.03.2018)

- No views or comments
- Consideration to be given to increase in traffic that could potentially cut through Woodton using B1527.

Comments on amended documents (30.08.2021)

- Although the planned development might be appropriate for this location in that it might help keep unnecessary development out of local rural villages such as Woodton, the increase in traffic is inevitable.
Has the necessary supporting infrastructure of schools, doctors' surgeries and shops been fully addressed should this development proceed?
Any traffic wanting to head west towards Bungay, Beccles, Lowestoft and the Suffolk coast is likely to travel via Woodton on the B1527. Although the signed route for traffic is via Church Road, many drivers cut through the centre of Woodton village using the Hempnall Road. The potential increase in traffic is of serious concern to residents of Woodton.

4.7 Fornsett Parish Council

Comments on originally submitted documents (16.03.2018)

- No objection
- Concerns regarding bypass - consideration should be given to the plans for the road to be a dual carriageway
- Impact of additional traffic on villages either side of Long Stratton
- Imperative roundabout replaces crossroads at Hempnall
- Existing strains on services

Comments on amended proposals:

- No comments received

4.8 Newton Flotman Parish Council

Comments on originally submitted documents (26.07.2019)

- Objects
- Generally happy with the proposed development at Long Stratton including the by-pass however, the impact of the increased density and volume of traffic will create intolerable problems to the already dangerous junctions with the A140 in Newton Flotman.
- The proposed bypass will even up the flow of northbound traffic making it much more difficult to leave the village and therefore creating a bottleneck around what is a complex series of junctions
- The recommendations of the Transport Assessment are inadequate, and could even make matters worse and full design of the of the junctions is required before the full development and the bypass.

Comments on amended proposals:

- No comments received

4.9 Tivetshall Parish Council

Comments on originally submitted documents (19.03.2018)

- Application should be refused
- Existing infrastructure unable to cope with existing demand which will be exacerbated
- Dual carriageway is essential for proposed bypass
- Single carriage way bypass is inadequate
- Medical services overstretched and addition provision needs to be considered
- Education currently oversubscribed – primary school needs to be built alongside the new homes
- Additional parking required in village centre

Comments on amended proposals:

- No comments received
-

4.10 Starston Parish Council

Comments on originally submitted documents (20.03.2018)

- Neutral
- No comments made

Comments on amended proposals:

- No comments received

4.11 Tasburgh Parish Council

Comments on originally submitted documents (21.03.2018)

- Neither approve or refuse
- Vast number of application documents to enable informed views
- Strongly support dual carriageway
- No consideration given improvements to Church Road junction
- Cycle path to Brands Lane should be extended to Tasburgh

Comments on amended proposals (07.09.2021)

- To re-affirm the previous comments submitted on 21 March 2018
- To include further concerns which have been raised with regards to delays in exiting the Church Road junction and the impact this will have on local traffic diverting and using Low Road as a preferred option of accessing the A140 via the Hempnall roundabout.

4.12 District Councillor

Comments on originally submitted documents (19.02.2018)

- Should only be determined by the Committee due to the scale and significance of this scheme (Cllr Des Fulcher - note no longer a local member).

Comments on amended proposals:

- No comments received.

4.13 Richard Bacon MP

- No comments received

4.14 SNC Housing Enabling Officer

Comments on amended proposals (28.02.2023)

- No Objection
- The affordable housing obligation applying to both applications (2018/011 - East of the A140, and 2018/0112 – West of the A140) will be:
 - Affordable housing percentage: 14.13% on-site.
 - Overall tenure split: 60% rented housing / 40% affordable ownership.
 - This tenure split to apply to each Phase.
 - The precise mix by type and tenure to be agreed at Reserved Matters stage on a Phase by Phase basis.
 - During the construction of each Phase there will be a review of the financial appraisal to establish whether more affordable housing is to be provided on-site.
- The total number of dwellings proposed is 1,875 (1,275 east of the A140 plus 600 west of the A140). The required number of affordable homes will be 265 (159 for rent and 106 affordable ownership).
- Applying the 14.13 percentage and the 60/40 tenure split means that the 1,275 dwellings east of the A140 will include 180 affordable homes (108 for rent and 72 affordable ownership).
- Each Phase will require an Affordable Housing Scheme, which must be approved by the Council. The Housing Enabling Team will seek to ensure that the mix type and precise tenure (within the specified 60//40 split) meets identified housing need.

4.15 Senior Heritage & Design Officer

Comments on originally submitted documents (summarised) 24.08.2018

- General arrangement/framework of the layout is generally acceptable. The main concern remains the density and close knit grain of housing to the west and visibility of this rural edge across a swathe of open countryside and listed buildings/lanes/footpaths to the west.
- The 'back areas' of mew/frontage parking court development to the south east could be better designed with regard of integration and planning of car parking spaces to provide more clarity, and lastly a more legible and better designed pedestrian and cycle connection to the south east.

Comments on amended proposals:

- No objection.

4.16 SNC Environmental Quality Team

Comments on originally submitted documents (28.02.2018)

- Lead Local Flood Authority is the statutory consultee for providing the technical assessment of this application

Comments on amended proposals (05.05.2022)

- Do not wish to object
- Recommend that any approval of this application includes conditions and notes relating to:
 - Contaminated Land - Investigation
 - Implementation of approved remediation scheme and validation
 - Contaminated land during construction
- Air quality report generally acceptable but further information is required as to the projected levels of PM2.5 to future proof the development.

- Request information regarding agreement which allowed the development to go ahead with the increase of a 5dB above the WHO guidelines as indicated in the noise impact assessment.

Comments on amended proposals (14.02.2023)

- Do not wish to object
- However, recommend any approval of this application includes conditions relating to noise assessment, implementation, and validation; implementation of changes to the master plan or approved odour remediation scheme and validation; lighting; construction impacts; construction management plan; unknown contamination and imported material.

4.17 Landscape Architect

- No objections.

4.18 NCC Planning Obligations

Comments on originally submitted documents (31.07.2018)

- Insufficient places available at local schools to accommodate the children arising from this development.
- A new 2 Form Entry Primary School would be needed to accommodate the children from this hybrid application
- A 2 ha site would be required to accommodate a new 2FE primary school. The County Council would expect the free transfer of land for the new school site to be provided through a S106 agreement
- CIL funding would be required to support additional places in the Early Education sector and at Long Stratton High School
- Fire hydrants will be required as per existing standing arrangements and also sought in respect of commercial developments.
- Strongly recommend the installation of sprinklers in all domestic and commercial developments
- Norfolk Library Service: a contribution of £244 per dwelling will be sought. Based on 600 dwellings the total contribution sought will be £146,000.

Comments on amended proposals:

- Reiterates previous comments dated July 2018

Comments on amended proposals (23.02.2023)

- Reiterates previous comments dated July 2018
- Additional comments:
- Children's Services would wish for a new school to be opening around occupation of 400 dwellings across the two sites. After considerable discussions with the applicant, we have reluctantly agreed to transfer the school site on occupation of 150 dwellings on the Eastern site

4.19 NCC Minerals and Waste

Comments on amended proposals (23.01.2023)

- No safeguarded mineral resources occur within the areas identified for built development, although some of the areas of open space close to the Water Recycling centre are underlain by safeguarded sand and gravel
- South Norfolk Council should ensure that Anglian Water as the operator of the Water Recycling Centre continues to be consulted regarding potential impacts on the existing operation from proposed development

4.20 Ecologist

Comments on originally submitted documents (21.03.2018)

- Satisfied from review of the submitted documents that the development could take place in line with relevant National and local Environmental Policies and European and UK Habitat and Species legislation
- significant mitigation or compensatory habitat may be required within the full applications including off-site mitigation for the areas of bird nesting habitat being lost.
- Negative effects to nesting birds are predicted due to habitat loss and disturbance
- The EcIA follows best practice guidance and all relevant habitats and species have been assessed as well as mitigation
- further ecological surveys will be necessary to revalidate the results and conclusions be drawn from them prior to the start of works
- all international statutory designated nature conservation sites are over 3km from the LSAAP development area,
- LSAAP is not predicted to have a LSE on any of the international statutory designated nature conservation sites within 25km of it.
- agree with the conclusions of the HRA Screening exercise that; “the provision of Green Infrastructure on the LSAAP site is considered sufficient to ensure it would not contribute to cumulative LSEs on designated sites

Comments on amended proposals (17.09.2021)

- Masterplan: Does not appear to be detailed landscaping plans for individual sections of the road available to view. The landscape masterplan provided for the whole road is not very clear because it is zoomed out and details for each section of the road have not been provided.
The landscape masterplan should differentiate between SuDS and existing or proposed ponds designed to retain water. We would encourage the creation of waterbodies that are designed to retain water all year around.
- The scope of the updated ecology surveys outlined in the Biodiversity Chapter of the ES dated May 2021 are appropriate.
- Net Biodiversity Gain:
- Section 7.249 of the Biodiversity Chapter refers to the need to reassess trees due to be felled for bat roost potential, however other arboricultural works for example, ivy removal, crown raising, limb removal could also potentially impact on roosting bats.
- Intention to join the GCN DLL scheme: It must be clear the process that the applicant intends to follow with regards to GCN DLL and as agreed with Natural England (including who would be responsible for assessing the impacts at each stage.)
 - The LEMP outlines habitat and species enhancement measures that will be provided, however there is very little information on the minimum areas of habitat enhancement that the applicant will be committing to providing or enhancing. The plan should also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/ or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

Comments on amended proposals (25.02.2022)

- Recommendations in line with comments dated 17/09/21
- Enhancements such as bat boxes, bird boxes, and hedgehog gaps will need to be defined on the building plans and landscape plans to indicate where they are to be located to follow recommendations in the LEMP

- Ahead of construction the advice strategies and mitigation from the Environmental Statement: Biodiversity Chapter 7 should be incorporated into a Construction Environmental Management Plan (CEMP).
- A 'statement of good practice' shall be signed upon completion by the competent ecologist, and be submitted to the LPA, confirming that the specified enhancement measures have been implemented in accordance with good practice upon which the planning consent was granted

Comments on amended proposals (03.03.2022)

- Ahead of construction the advice strategies and mitigation from the Environmental Statement: Biodiversity Chapter 7 should be incorporated into a Construction Environmental Management Plan (CEMP) in accordance with BS42020:2013 D.4
- A 'statement of good practice' shall be signed upon completion by the competent ecologist, and be submitted to the LPA, confirming that the specified enhancement measures have been implemented in accordance with good practice upon which the planning consent was granted.

Comments on amended proposals (14.02.2023)

- It is not possible to ascertain that the proposal will not result in adverse effects on the integrity of the Broads SAC and Broadland Ramsar. It is advised that the shadow HRA is not adopted by the LPA and that permission should not be granted at this stage.
- Having agreed use of 110 l/p/d Stantec have however calculated TP and TN based on water usage of 120 litres/person per day. It is recommended, that the calculation is corrected to reflect the average water usage of 110 l/p/d rather than 120 l/p/d.
- For clarity a plan is requested which show the areas from which the existing land use types have been calculated.
- There should be scientific certainty that the NN measures will deliver the required reduction, and there should be practical certainty that the measures will be implemented and in place (secured and funded for the lifetime of the development).
- Because options are provided for the long-term strategy there cannot be scientific certainty that the measures will deliver the required reduction (i.e. Any offsite mitigation would need to be secured (for the lifetime of the development) as part of a S106 at outline and the WwTW upgrades cannot be relied upon until legislation securing the requirement for water companies to achieve TAL is in place.
- Application should include evidence that following has been agreed with the landowner
- The additional land required to mitigate NN may affect the area of land available for recreation, which is also required to mitigate impact on Habitat Sites. This will need to be considered as part of the shadow GIRAMS HRA to show that the application will still deliver open space of a sufficient quantity.
- The RAMS tariff will need to be secured via a S.106 to mitigate potential in combination recreational impacts on the Brecks, Broads, East Coast and Norfolk Valley Fens Habitat Sites.
- It is recommended that each RM is accompanied by a detailed Biodiversity Method Statement and a Biodiversity Net Gain Audit.
- Extent of hedges to be provided off site to be included in S106.
- Skylark compensation is addressed within the S106
- A Lighting Design Strategy will need to be conditioned for each phase which considers a Dark Corridor condition.
- The first RM application for each phase must be accompanied by valid ecological information
- Updated LEMP to be submitted with each RM, including a LEMP for the proposed wetland areas required to mitigate Nutrient Neutrality.
- Where SuDS do not form part of the open space it is recommended that permanent water to provide wildlife habitat is secured as part of the Biodiversity Method Statement condition.

- The applications have been accepted into the District Level License (DLL route). A countersigned Impact Assessment Conservation Payment Certificate, and map has been received by the LPA.
- The Landscape Masterplan should be amended to include all areas within the red-line and exclude those outside
- Applicant to consider new friendly drainage designs for GCN at detailed design stage.
- Suggested wording for conditions for water efficiency, Biodiversity Method Statement, Biodiversity Net Gain Audit, Construction Environmental Management Plans, Landscape and Ecological Management Plans, Dark Corridors, Lighting design strategy for biodiversity, further surveys if required and copy of the Protected Species licence.

4.21 NCC Highways

Comments on originally submitted documents (03.04.2018)

- layout shown on drawing NHLS1/10-01 is generally acceptable with some minor comments relating to private drives, cycle path adjacent to western relief road, parking and car ports, manoeuvring space and the use of block paving kerbs.

Western Relief Road:

- County Council does not propose to comment on the Northern roundabout as this forms part of the Long Stratton bypass that is subject to a different planning application.
- Alignment of the western relief road is generally acceptable although together with the junction with Swan Lane should be the subject of a Stage 1 Safety Audit
- Swept path analysis layouts are unclear
- Do not propose to provide detailed comments on the construction details at this stage
- Expect forward visibility to be provided at the Swan Lane diversion and to also be considered at all over bends along the length of this road
- Have not commented on the Design Code, Travel Plan or Transport Assessment as part of this planning application as they will be considered by the County Council in response to the planning application for the bypass and development to the east of Long Stratton

Comments on amended proposals (07.10.2021)

- Do not wish to raise an objection to the principal of the proposed development but unable to offer conditions until concerns detailed in previous comments 2018 are addressed (no revised plans/information have been submitted in relation to the areas seeking full planning)
- 250 dwellings across both applications should be the trigger for the bypass. Conditions requested to reflect this
- The northern roundabout will need to be constructed regardless of the bypass
- Western link road and the northern roundabout should be constructed prior to the 100th dwelling being occupied of this development
- Ped/cycle links and a crossing facility at the northern end of the current A140 to connect to the proposed spine road for the eastern development need to be provided.
- does not intend to provide detailed comments on the proposed construction details at this stage, which will be subject to future conditions.
- will be requiring a condition for the delivery of the footway/cycle path connecting the site to the A140 along Swan Lane
- A further condition will be required for the southern end of the western link road which will be required to access the site.

Comments on amended proposals (28.03.2022)

- detailed comments as per response of 2018 remain unaddressed so need to be actioned before determination.
- Reiterates comments in responses 2018 and 2021
- No objection subject to appropriate conditions:
- SHC 01 relating to detailed plans for roads, footways, cycleways, street lighting, foul and surface water drainage
- SHC 02 relating to all works shall be carried out on roads, footways, cycleways, street lighting, foul and surface water sewers
- SHC 03A relating to road(s), footway(s) and cycleway(s) shall be constructed to binder course surfacing level preoccupation
- SHC 23 relating to onsite parking for construction workers
- SHC 24A, SHC 24B relating to CTMP and Access Route
- SHC 33A, SHC 33B, SHC 33C, SHC 33D SHC 33E, SHC 33F relating to off-site highway improvement works
- SHC 35A, SHC 35B relating to Interim Travel Plan
-

Comments on amended proposals (23.02.2023)

- highway authority has reviewed the information submitted as part of this revised application in relation to the full detailed element of the application and can confirm that the layout shown on drawing NHLS1-10-01C is considered to be acceptable.
- highway authority does not intend to provide detailed comments on the proposed construction details at this stage, which will be subject to future conditions.
- highway authority would not wish to raise an objection to the proposed development subject to appropriate conditions.
- In addition to the standard estate road, construction traffic, wheel cleaning and Travel Plan conditions, the highway authority will be requiring a condition for the delivery of the footway/cycle path connecting the site to the A140 along Swan Lane which will require a scheme to be designed and approved prior to commencement and the footway/cycle path to be delivered prior to first occupation.
- A further condition will be required for the southern end of the western link road which will be required to access the site.

4.22 NCC Public Rights of Way Officer

Comments on originally submitted documents (31.07.2018)

- Safe off-carriageway access to Tharston 24 will be required to integrate the new development with the existing PRow network and allow population safe access to wider informal recreation opportunities
- The location of Public Open Space proposed in the application links well to the existing PRow network and with suitable access in line with LSAAP
- County Council would assume that stopping up and PRow diversions would be undertaken in an appropriate manner by the applicants, with sensible coordination in relation to the delivery of homes

Comments on amended proposals (07.10.2021)

- Generally we are satisfied that the PRow in the vicinity of this section of the development as a whole are not being compromised and are pleased to see that the proposed layout of public open space provides a new off-road link between Tharston FP24 and Tharston FP31.

- FP8 / FP25 has been incorporated into an area of public open space which goes some way in retaining its current rural setting. Details are needed of the layout in this area to ensure the PRow is not obstructed but fully utilised as providing the development connectivity and integration from the on-site recreational provision into the existing PRow network
- Concerned that FP8/FP25 is to be dissected by the new relief road. Expect a formal pedestrian crossing point to be part of the highway design.

Comments on amended proposals (28.03.2022)

- Generally satisfied that the PRow in the vicinity of this section of the development as a whole are not being compromised and that these existing recreation facilities were being incorporated into the green open space areas
- The amendments to the western relief road design/access to Swan Lane design have not clarified how the severance of FP8/FP25 is to be incorporated into the design in terms of its connection to the new road, its continuation or how east/west pedestrians are to safely cross the road.
- No detail at this stage on how FP8/FP25 links to cycleways and footways
- FP8 / FP25 has been incorporated into an area of public open space which goes some way in retaining its current rural setting. Details are needed of the layout in this area to ensure this PRow is not obstructed
- It is necessary to discuss these proposals further at the earliest opportunity to ensure the public are not being compromised any more than is necessary.

Comments on amended proposals (23.02.2023)

- The Design Code January 2022 (Revised January 2023) has not clarified how the severance of FP8/FP25 is to be incorporated into the design in terms of its connection to the new road, its continuation or how east/west pedestrians are to safely cross the road. This point was raised in our previous comments of September 2021 and March 2022.
- FP8 / FP25 has been incorporated into an area of public open space which goes some way in retaining its current rural setting. The landscape masterplan shows other recreational paths linking into it although there seems to be an overlap of the two in places. Details are needed of the layout in this area to ensure this PRow is not obstructed but fully utilised as providing the development connectivity and integration from the on-site recreational provision into the existing PRow network.

Comments on amended proposals

- Thank you for these amended drawings, which include detail of the crossing. They clearly show the position of the PRow in relation to the new road, and the crossing point is in a suitable location. I am satisfied that my concerns regarding this have now been addressed.

4.23 National Planning Casework Unit

- No comments received

4.24 NCC Historic Environment Service (HES)

Comments on originally submitted documents (31.07.2018)

- Further information is required about the presence, extent, form, date, surviving condition and significance of the heritage assets with archaeological interest at the site before a fully informed planning recommendation can be made about the historic environment implications of the proposed development

- Preliminary advice in accordance with para 128 of NPPF, is that a programme of archaeological trial trenching is carried out to support the geophysical survey and that the results are submitted to South Norfolk Council and Norfolk County Council Environment Service for consideration prior to the determination of the planning application

Comments on amended proposals (27.08.2021)

- Previous advice stands
- Pre-application geophysical survey and desk-based assessment has been completed and we are happy that the remainder of the archaeological mitigation can be achieved through the appropriate planning condition.
- For the planning application as a whole, if planning permission is granted, suggest 3 conditions are imposed relating to the submission and approval of, and development completed in accordance with, archaeological written scheme of investigation

Comments on amended proposals (07.09.2021)

- Reiterates previous comments dated 27.08.2021.

Comments on amended proposals (01.04.2022)

- Suggests the wording of the archaeological conditions.

Comments on amended proposals (23.02.2023)

- Pre-application geophysical survey and desk-based assessment has been completed and we are happy that the remainder of the archaeological mitigation can be achieved through the appropriate archaeological planning condition.

4.25 NCC Lead Local Flood Authority (LLFA)

Comments on originally submitted documents (31.07.2018)

- Subject in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy relating to:
- Local flood risk to the development from the ordinary watercourses adjacent and crossing the site has not been fully considered.
- Impacts from the development adversely affecting flood risk elsewhere due to the development of the Spine Road not fully considering the fluvial flood risk.
- Impacts from the development adversely affecting flood risk to the proposed housing and elsewhere by not considering Sustainable Urban Drainage Scheme (SuDS) adequately with regard to the drainage scheme at a 1% annual probability rainfall event (which is proposed to be managed above ground).
- Provision of adequate mitigation for the development considering all sources of flooding; fluvial from the ordinary watercourse; overland flows from the drainage scheme and interception of temporary runoff from the undeveloped site overwhelming the Spine Road drainage scheme.
- Further information is required from both applicants as to the legal agreement and phasing of development to ensure that the roundabout construction will have attenuated storage (prior to the residential development coming forward associated with the SuDS attenuation basin - Lagoon 4)

Comments on amended proposals (28.02.2019)

- Strongly recommend that the following information is provided following information is provided prior to determination of the application:
- Existing Reports that have been submitted to the LLFA are submitted to the local planning authority (lpa)

- Details of drainage for the roundabout to the north of the spine road are submitted and shown that there are temporary measures in place to prevent an increased risk of flooding prior to the other development coming forward that drains to the same SuDS feature.
- No objection subject to conditions being attached to any consent if this application is approved and the applicant agrees with pre-commencement conditions

Comments on amended proposals (02.09.2021)

- No objection subject to conditions being attached to any consent if this application is approved and the applicant agrees with pre-commencement conditions.

Comments on amended proposals (25.02.2022)

- The LLFA previously responded to this planning application (FW2021_0688) on 6 September 2021, when no objection subject to conditions being attached to any consent.
- No further comments submitted.

Comments on amended proposals (23.02.2023)

- Refers to comments made in letter dated 06.09.2021.
Additional comments:
- Since issuing this letter the national climate change guidance for flood risk assessments was updated in May 2022, so that a specific river catchment climate change allowance is now applied.
- The LLFA continues to have no objection subject to an additional condition being attached to any consent, being included along with our previous conditions relating to Flood Risk Assessment and Drainage Strategy
- In relation to the proposed surface water drainage schemes where the peak rainfall intensity is applied the majority of this will apply to the proposed outline development. Therefore, the LLFA would seek to update our previous recommended conditions to reflect this increase to 45% for the 1% AEP and 40% for the 3.3% AEP event. However, for the surface water drainage within the full planning application area, the LLFA will require the updated surface water drainage modelling for 1% plus 45% climate change to be provided along with the 3.3% plus 40% for climate change. The above matters will need to be satisfactorily addressed as part of this application process.
- The LLFA continues to maintain its previous position subject to one additional condition being attached, the amendment of another condition and the previous conditions given in our previous letter dated 25 February 2022 (FW2022_0109) being to any consent.

4.26 Natural England

Comments on originally submitted documents (23.03.2018)

- No objection subject to appropriate mitigation being secured fully through appropriate planning conditions or obligations.
- Recommends the following measures are addressed/secured:
 - Ensure that the GI proposals are in full accordance with the policies and provisions contained in the LSAAP, including the delivery of sufficient appropriate green space provision and capacity for dog walking;
 - Identification of exactly how recreational disturbance impacts to Fritton Common SSSI and Pulham Market Big Wood SSSI will be prevented;
 - How sufficient financial contributions for the management and maintenance of GI will be secured and maintained long term, it would be better if this could be done holistically across the applications;
 - How GI will be phased to ensure it is delivered in a timely and appropriate manner;

- Suitable connections created to link to other off-site accessible GI including footbridges over the new roads, where appropriate and in accordance with the LSAAP; and
- How the proposed GI mitigation will be monitored post-development to measure its effectiveness
- Based on the mitigation measures proposed within the planning application documents, the proposals are unlikely to have a significant effect on the above SAC, SPA or Ramsar site. We also consider they are unlikely to adversely affect the above SSSIs. In order to mitigate these adverse effects arising from recreational disturbance, and make the development acceptable, the on-site green space provision and capacity as proposed in the outline application needs to be secured legally.

Comments on amended proposals (08.09.2021)

- No objection subject to mitigation, as consistent with our previous advice dated the 23rd March 2018.
- Recommend consideration of the soon to be adopted Norfolk Green Infrastructure and Recreation Avoidance and Mitigation Strategy (GIRAMS) and the inclusion of biodiversity net gain in the National Planning Policy Framework in relation to the proposals
- To provide adequate mitigation onsite GI should be designed to provide a multifunctional attractive space of sufficient size to reduce frequent visits to designated sites. It should facilitate a variety of recreational activities whilst supporting biodiversity
- Recommend resident dog walkers have access to promoted and signposted circular walks, of average length onsite and/or within walking distance of the proposed development.
- Welcome the inclusion of SuDs
- LPA to consider proposals and GIRAMS
- Biodiversity Net Gain as per Para 174, 180 of NPPF

Comments on amended proposals (16.02.2022)

- The advice provided in our previous response applies equally to this amendment.
- Natural England welcomes the amendments to the environmental statement such as the inclusion of porous fences for hedgehogs and bird nest boxes on 80% of housing, as well as considering recreational disturbance on Fritton Wood SSSI.
- Welcome the additional detail given in the Revised Design Code.
- No further comment to make but refer you to our previous advice.

Comments on amended proposals (14.02.2023)

- Further information required to determine impacts on designated sites, including:
- An updated Nutrient Neutrality Assessment and Mitigation Strategy which uses the appropriate land use categories and guidance methodology for calculating efficiency of mitigation measures, as well as providing sufficient certainty over the proposed mitigation
- An updated Habitats Regulations Assessment that secures appropriate and sufficiently certain mitigation measures at the appropriate assessment stage. This includes consideration of the impacts from increased recreational disturbance and increased nutrient loading.
- Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained.

4.27 Historic England (NE)

Comments on originally submitted documents (13.03.2018)

- Concerns regarding the application on heritage grounds owing to the harm caused by the proposal to the setting of the designated churches of St Michael and St Mary, the Long Stratton Conservation Area, and Nos. 1 & 2 Church Lane.
- We consider the harm to the conservation area and to the Church of St Mary would be of a low to moderate level. However,
- Recognise the benefits to the conservation area of removing the traffic, and of the potential for enhancements to be made to the area's public realm.
- Historic England considers overall that there will be less than substantial harm to the significance of the heritage assets, which should be appropriately weighed against the public benefits of the development, in line with national planning policy.
- Application to ensure it meet requirements of para 129,132 and 134 of NPPF.

Comments on amended proposals (31.08.2021)

- Do not wish to offer any detailed comments.
- Pleased to note that the alterations to the scheme to the north of Hall Lane broadly reflect the advice and concerns raised in our correspondence of March 2018
- Not necessary to be consulted on this application again unless there are material changes to the proposals.

Comments on amended proposals (02.03.2022)

- Not offering advice.
- Not necessary to be consulted on this application again unless there are material changes to the proposals

4.28 Environment Agency (EA)

Comments on originally submitted documents (21.03.2018)

- No objection to the proposals providing a condition is appended to any permission granted to ensure that Long Stratton Sewage Treatment Works will have sufficient capacity to prevent any deterioration of water quality as a result of this development.
- Long Stratton has been identified as an area with wastewater treatment concerns however, there is an agreement between EA and Anglian Water that there is capacity for the 1,800 houses.

Comments on amended proposals (25.06.2018):

- Anglian Water and the Environment Agency would not want to delay the first phases coming on stream, there is no argument that there is not sufficient capacity to treat these so it would be unreasonable to condition this.
- AW and EA consider that the first 3 phases of both the Western and Eastern development can commence without the need for a waste water treatment strategy (totalling 1045 dwellings). A condition has been suggested as follows: "Apart from enabling works no development shall commence on phase D of the Eastern development and phase 4 of the Western development, until a wastewater treatment strategy, in consultation with Anglian Water and the Environment Agency, covering the remaining phases has been submitted and approved in writing by the Local Planning Authority."

4.29 Highways England

Comments on originally submitted documents (23.02.2018)

- The Town And Country Planning (Development Affecting Trunk Roads) Direction 2018.

Comments on amended proposals (09.03.2018)

- Requires more information from developer regarding number of vehicles using A47/A140 junction.
- Issues:
- Traffic conditions at the A47/A40 junction are not consistent with a peak RFC of 0.61 in the 2015 base year
- ARCADY model has not been validated against observed queue lengths
- An assessment year of 2019 seems very early for the opening year of a site this size and appears to be no 10 year or end of local plan review period assessment as required by Circular 02/2013 (para 25).
- The ARCADY model of the A47/A140 roundabout has not been run with lane simulation
- The ARCADY model contains a number of entry and approach widths which appear excessive relative to the widths available
- How much of the traffic would be using the P&R at the A47/A140 and how much traffic will continue into Norwich on the A140?

Comments on amended proposals (27.04.2018)

- Holding Direction: recommends this application is not granted until 30 June 2018 or until a satisfactory response is received.
- Issues:
 - Details of the sustainable mode offer.
 - The discrepancy in the choice of PM peak hour
 - A more suitable Opening Year assessment (other than 2019) should be undertaken.
 - A more robust trip rate should be sourced for the B1 land use and used in the trip generation for this assessment
 - The traffic flows presented in diagrams TA07, 08, 17 and 18 of the TA should be amended as per the recommendations in Paras 5.1 and 5.9 of this note and reissued before being used in an updated set of junction capacity models.
 - Traffic flows used in the ARCADY models should be converted to PCUs either before being input into the ARCADY models, or within ARCADY itself;
 - Lane simulation should be used in ARCADY in the PM peak for the A47 slip road approaches.
 - The geometry of the A47 slip road approaches to the roundabout should be adjusted to exclude the metre strips and hatched areas which do not form part of the running lanes.
 - A formal assessment should be undertaken of the A140/ A47 slip roads against the traffic flow ranges shown in TD22 Table 3/1a and Figures 2/3AP and 2/5AP.

A series of holding comments were received between 15th July 2018 and 30th April 2019 reiterating previous comments and advising not all comments have been resolved.

Comments on amended proposals (31.07.2019)

- Clarification on the current situation is outstanding: previously raised a number of issues regarding the assessment of the transport impacts of this proposal on the A47 trunk road.
- Requested that application is not determined before 27 November 2020.

Comments on amended proposals (29.11.2019)

- Currently reviewing the proposed highway measures which are required to mitigate the impact of the development on the A47 trunk road and to safeguard its performance in accordance with the requirements of the Highways Act 1980.
- Recommend the application be not determined before 3 January 2020.

Comments on amended proposals (23.12.2019)

- Clarification on the current situation is requested, so that the outstanding issues can be addressed - previously requested further information regarding the impact of the proposals on the A47 trunk road and in particular its junction with the A140. It is understood that this information has been depending until such times there is clarity with the development and delivery of the A140 Long Stratton Bypass.
- Requested that application is not determined before 27th March 2020

Comments on amended proposals (27.03.2020)

- Clarification on the current situation is requested, so that the outstanding issues can be addressed [as above]
- Requested that application is not determined before 28th May 2020.

Comments on amended proposals (28.08.2020)

- Clarification on the current situation is requested, so that the outstanding issues can be addressed [as above]
- Requested that application is not determined before 27 November 2020

Comments on amended proposals (27.11.2020)

- Planning application has been in abeyance for some time. Once advice is provided that the proposals are being taken forward, Highways England will review the current position of the likely impact of the development on the A47 trunk road with the aim of responding formally to the application.
- Suggests that the application is not determined before April 2021.

Comments on amended proposals (30.04.2021)

- Whilst this planning application has been in abeyance for some time, we are now in discussion with the application to resolve any matters relating to the impact of the proposed development on the operation of the A47/A140 junction.
- Requested that the application is not determined before 30 June 2021 to enable those discussions to be concluded.

Comments on amended proposals (30.06.2021)

- Understands that an updated TA is being finalised and is expected to be shared in the next few weeks.
- Requested that the application is not determined before 30 September 2021.

Comments on amended proposals (30.09.2021)

- Still waiting an updated TA. Without an opportunity to understand the impacts (if any) on the performance of the A47, we are not in a position to be able to respond to this consultation.
- Requested that the application is not determined before 25 November 2021

Comments on amended proposals (25.11.2021)

- TN02 highlights a number of major areas of concern in relation to the assessment undertaken on Harford Interchange, which includes a bus improvement scheme that is linked to the provision of the Long Stratton bypass and development. There was also a sub-standard merge noted on the westbound entry to the A47.

- Need time for the review to be completed by the applicant and matters to be addressed.
- Request that this application not be determined before 28/01/2022.

Comments on amended proposals (23.12.2021)

- Updated TA has been reviewed and accepted
- Recommend that conditions should be attached to any planning permission that may be granted
- It is agreed that the effect of the scheme on Harford Interchange is acceptable.
- The bus improvement scheme has no funding to be delivered in the short term, despite being in policy. However, even without the bus improvement scheme this application will have an acceptable impact on the junction.
- Harford Interchange: it is noted that there is a sub-standard merge on the westbound entry to the A47, however it is not deemed reasonable within the scale of this development to ask for mitigation to address this.
- Recommend Travel Plan Condition

Comments on amended proposals (02.02.2023)

- recommend that conditions should be attached to any planning permission that may be granted
- Planning application amendments are not considered to alter previous comments issued on 23 December 2021.

4.30 Anglian Water Services Ltd (AW)

Comments on originally submitted documents (13.03.2018)

- Assets Affected: Anglian Water would ask that the following text be included within your Notice should permission be granted. *“Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.”*
- Wastewater Treatment: Long Stratton Water Recycling Centre will have available capacity for these flows.
- Foul Sewerage Network: The sewerage system at present has available capacity for these flows.
- Surface Water Disposal: The proposed method of surface water management does not relate to Anglian Water operated assets

Comments on amended proposals (13.09.2021)

- Assets Affected: As per previous comments submitted 13.03.2018
- Wastewater Treatment: As per previous comments submitted 13.03.2018
- Used Water Network: Development may lead to an unacceptable risk of flooding downstream. No objection subject to a planning condition requiring phasing plan and on-site drainage strategy.
Surface Water Disposal: Preferred method is SuDS, last option is connection to sewer.

Comments on amended proposals (28.04.2022)

- Assets Affected: As per previous comments submitted 13.03.2018
- Wastewater Treatment: Long Stratton Water Recycling Centre currently does not have capacity to treat the flows the development site. AW are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission. Some areas within this development site will be exposed to odour emissions and noise emanating from the Long Stratton WRC operation – a detailed assessment to mitigate this exposure by layout and design.
- Used Water Network: The sewerage system at present has available capacity for these flows
- Surface Water Disposal: Preferred method is SuDS, last option connection to sewer

Comments on amended proposals (20.01.2023)

- No additional comments to add to previous response.

4.31 Waveney Lower Yare & Lotingland IDB

- No comments received

4.32 Norfolk Rivers Internal Drainage Board (IDB) / Water Management Alliance

Comments on originally submitted documents (30.04.2018)

- Where a surface water discharge is proposed to a watercourse within the IDD (either directly or indirectly), land drainage consent is required in line with the Norfolk River Internal Drainage Board's byelaw 3.

Comments on amended proposals (26.10.2021)

- Recommend that the proposed strategy for any infiltration within residential areas of the development is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater.
- Land Drainage Consents will be required for the proposed discharge of surface water (Byelaw 3)
-

Comments on amended proposals (22.12.2021)

- The LLFA has assessed that they have no objection to the application being permitted with the addition of pre-commencement conditions. We support the LLFA's position and request for further information in due course.
- Re-iterate that Land Drainage Consent will be required from the Board for the proposed discharge of surface water from this development.
- Recommend that the required consent is sought.
- Likely that significant improvement works will be required to the receiving watercourses and wider network within the Board's IDB.

Comments on amended proposals (30.03.2022)

- No additional comments to add to letter dated 22.12.2021.

Comments on amended proposals (06.02.2023)

- No comments in addition to our letter of 30.02.2022

4.33 Sport England

Comments on originally submitted documents (19.02.2018)

- Objects
- Conflicts with Objective 3 - fails to make adequate provision for community indoor/outdoor sports provision to meet the demand generated by this development

Comments on amended proposals (15.09.2021)

- Objects
- Applications conflict with Objective 3 - fails to make adequate provision for community indoor sports provision to meet the demand generated by this development and will exacerbate the current situation of the leisure centre being full at peak times.
- Welcome further discussion on outdoor sport and how this can be provided to meet local needs.

Comments on amended proposals (20.02.2022)

- Neither object or support
- Further discussions will be needed to determine the scale, location and quantity of sports facilities to serve this development.
- Encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct Community Infrastructure Levy (CIL) monies to deliver new and improved facilities for sport.
- Potential to consider the provision of a cricket facility within this development.
- Potential for the indoor/outdoor sports facilities to be provided within the primary school, to be made available for the local community
- Norfolk FA do not wish to make any additional comments to those previously submitted.
- The Rugby Football Union (RFU) do not wish to make any additional comments to those previously submitted, and they seek a financial contribution to help nearby rugby union clubs.
- The absence of an objection to this application cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.
- If planning consent is granted, the following conditions should be imposed on any grant of planning consent:
 - 1. *A requirement for a site survey and implementation plan for new sports pitches.*
 - 2. *A community use agreement to cover access to the primary school sports pitches and indoor hall.*

Comments on amended proposals (08.02.2023)

- Neither object or support
- Reiterates comments made in letter dated 20.02.2022

4.34 Norfolk Wildlife Trust (NWT)

Comments on originally submitted documents (29.03.2018)

- With exception for the road link to Swan Lane, the majority of key areas of local biodiversity value are protected as natural green space and are joined up as GI.
- Need to ensure that these areas are managed for their biodiversity value and do not become amenity green space.

- Recreational impacts from housing from 2018/0112 is unlikely to have negative impact on designated sites to the East, such as Fritton Common Site of Special Scientific Interest (SSSI) and Wood Green County Wildlife Site (CWS)
- May be limited pressure on Tyrrells Wood CWS/Pulham Market Old Wood SSSI
- Unlikely to be significant adverse impacts from recreational visits to Fornsett Meadows SSSI and Aslacton Parish Land SSSI
- Mitigation is necessary to minimise the potential for negative impacts on these SSSIs and put in place as part of any planning approval.
- A need to consider options for great crested newts within the development
- Support the views of NCC ecologist that impacts on farmland birds needs to be subject to mitigation and that compensatory nesting habitat will need to be provided, a significant portion of which will need to be created off-site
 - Creation of new areas of greenspace - it would be good to see local species reflected in planting schemes
 - Actions proposed within the Landscape Ecological Management Plan (LEMP) should be subject to planning conditions
 - Concerns over the ongoing management of Green Infrastructure (GI) and the mechanism by which management is funded
 - Long-term management of the open space that is being protected for its biodiversity value – need to ensure that this is seen as wildlife habitat in the long-term.
 - Zoning of areas of green space needs to be clearly addressed in the LEMP

Comments on amended proposals (17.09.2021)

- No objection in principal but seek clarification on several points to ensure compliance with planning policy.
- No evidence to demonstrate that a net gain would be delivered.
- Landscape masterplan fails to provide sufficient certainty on where the mitigation measures set out in the ecology report will be delivered, when they will be delivered and by whom.
- Recommend that a more detailed schedule and identification of delivery responsibilities set out at the outline stage (tied to phasing schedules) to provide certainty that mitigation will be delivered and created with sufficient lead in time to successfully establish before the projected losses to development occur.
- Recommend that further details are provided as to where responsibility lies for the monitoring and the delivery of any remedial measures.
- Support the proposal to include wildlife nesting boxes on all new development where appropriate.
- Support the recommendations made in the ecology chapter to use seeds sourced from local native stock.

4.35 Campaign to Protect rural England (CPRE)

Comments on originally submitted documents (20.03.2018)

- We see no reason why the bypass or its roundabouts should be lit. The residential streets in what is a low crime area should be subject to part-night lighting.
- Lighting in the southern employment/industrial zone also needs to be regulated, so that any unnecessary lighting is turned off when not needed, and is factored in as a planning condition.
- No mention in the ES chapter 6 of the Norfolk County Council Environmental Lighting Zones Policy. The countryside that surrounds Long Stratton, together with the villages and hamlets contained therein is classified as Rural Dark Landscape

- It is extremely important that these rural dark landscapes surrounding Long Stratton are protected from intrusive lighting from the proposed development.
- CPRE Norfolk would like to be fully engaged at an early stage in the planning process with respect to the lighting of this proposed development, and would welcome engagement with South Norfolk planners and the developers on this issue.
- Want to see the provision of safer crossing points for pedestrians and cyclists across the new bypass.
- The current plans would lead to the bypass being a physical and psychological barrier, both for residents wanting to walk and cycle out of Long Stratton to the East, and to residents of the smaller villages and hamlets to the East of Long Stratton wanting to walk and cycle into the town.
- It is claimed these are safe ways to cross, we feel this is not the case especially when compared to a footbridge. Also, walkers and cyclists would not want to contend with traffic on roads such as Parker's Lane, which is narrow and without a walkway. It is important to provide safe access to and from the countryside across the bypass, as supported by policy LNGS5 of the Long Stratton Area Action Plan.
- We suggest the addition of at least one bridge (or tunnel) for walkers and cyclists.
- Maximum attention needs to be given to the need to reduce traffic and road noise as much as possible.

Comments on amended proposals

- Environmental Statement (ES) dated May 2021 that: "There will be no lighting proposed on the bypass nor on the roundabouts (except illuminated signage..)". This is good news and we are thankful that this approach is to be followed.
- It is also good to note that the ES now includes a reference to the Norfolk County Council Environmental Lighting Zones Policy.
- Overall the chapter on lighting is a thorough piece of work and the visuals in Appendix 6.1 (Viewpoints) and Appendix 6.2 (Photo Viewpoints) are especially good at revealing the rural dark landscape characteristics of the area surrounding Long Stratton including the by-pass route – high quality aspects of the local environment very much worthy of protection.
- The rural dark skies and dark landscapes experienced in the countryside, villages and hamlets surrounding Long Stratton are very special features of South Norfolk.

4.36 NHS England

Comments on originally submitted documents (21.03.2018)

- Development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development. This is stated to be for an extension to the existing premises in Loong Stratton.
- Capital required through developer contribution would form a proportion of the required funding for the provision of additional capacity to the existing GP practice to absorb the patient growth generated and additional GPs.
- A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required from this development to be £150,369. Payment should be made before the development commences.
- Satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF

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

Comments on amended proposals:

- No comments received.

4.37 Norfolk And Waveney Local Medical Council

- No comments received

4.38 South Norfolk Clinical Commissioning Group

- No comments received

4.39 Wood Green Residents Association

- Comments received in relation to application ref 2018/0112.

4.40 The Ramblers

- No comments received

4.41 First Bus

- No comments received

4.42 Sustrans

- No comments received

4.43 Wheels For Wellbeing

- No comments received

4.44 Diocese Of Norwich

- No comments received

4.45 Police Architectural Liaison Officer (PALO)

Comments on originally submitted documents (23.03.2018)

- Recommend that applicant fully embraces the principles of Crime Prevention through Environmental Design (CPTED) and security measures recommended in Secured by Design (SBD), Homes 2016 guidance, SBD and Commercial 2015 guidance.
- Phase E1: no adverse comment regarding specific locations except appropriate access controls should restrict unnecessary permeability through this site
- Phase 1-4 domestic development:

- Recommend lower levels of front, rear and side boundary treatments
- Lengthy rear footpaths should be avoided and beneficial protective lighting cover over such footpaths is recommended and security measures should reflect SBD, Homes 2016 guidance.
- Natural surveillance must include openness of aspect, vegetation kept distant from wide pathways and active rooms from nearby/overlooking properties
- Parking is encouraged to be en-curtilage or in front of the owning property
- Recommend and encourage that gable end walls overlooking driveways/garages are specifically provided with beneficial active room window cover
- Recommend internal road system to be less meandering and more linear
- concern that Type 6 roadways might serve as 'rat runs' with recommendation that such connections are reconsidered.
- Assessments for street lighting and dwellings have not included reference to SBD, Homes 2016 guidance nor Lighting Against Crime, *A guide for crime reduction professionals 2011*, endorsed by the Association of Chief Police Officers, Secured by Design and the Institute of Lighting Professionals.
- Encourage the removal of visitor parking bays
- Encourage a review of the necessity for additional connecting footpaths and increased permeability
- Substantial vegetation or large trees should not be sited close to connecting footpaths across the development

Comments on amended proposals (23.08.2021)

- Issues outlined in previous comments are still relevant
- A design that helps reduce vulnerability to the rear of homes and is supported
- Communal spaces are designed with natural surveillance supplied from nearby dwellings, with safe routes for users to come and go
- Routes for pedestrians, cyclists and vehicles are integrated into the main development – this inclusive design has ensured that the security of the development is not compromised by excessive permeability
- Good provision of suitable rear & side fencing had been indicated throughout the elevation-housing-layout plan, together with appropriate perimeter treatment to the front.
- Pleased to note that a 1.8m fence is indicated to protect the southwest boundary and parking spaces from adjoining council car park.
- The Landscape Proposal for Plots and POS show good indication of defensive spaces provided over the development
- Allocated parking spaces are en-curtilage or provide within parking courts, mostly to front of housing where orientation of houses has provided good surveillance, this is very much supported.
- Please consider replacing 1.8m close board treatments with trellis topping
- Excellent provision provided throughout the design of 'active windows' for natural surveillance
- Layout, defensive spaces and boundary treatments indicated within the application are excellent

Comments on amended proposals (07.02.2022)

- The provision of a new 1.8m high close board fence to the southern Boundary is noted
- Norfolk Police have not further comments.

Comments on amended proposals (30.01.2023)

No further comment to make other than with the layout change observed on the amended Affordable Housing Plan, to request consideration in replacing 1.8m close board treatments with trellis topping (0.3m) to assist surveillance over rear parking of spaces #76 & 77.

Norfolk Police

Comments on amended proposals (28.09.2021)

- Further investment will be required to enhance provision and infrastructure
- Considered that a contribution of £50 per dwelling would be an appropriate level to be secure by s106 agreement (or CIL).

4.46 Norfolk Fire Service

No comments received

4.47 Open Space Society

Comments on originally submitted documents (21.06.2019)

- Detrimental and lasting adverse impact on the public's enjoyment of the Norfolk Countryside
- The quiet network of public paths to the east of the village will be dissected and disrupted by a proposed new bypass
- Adverse visual impact within the landscape
- Noise and pollution emitted by motor traffic
- Adequate improvements to the PROW network need to be expected by LPA

Comments on amended proposals:

No comments received.

4.48 Banham Poultry Limited

Comments on originally submitted documents:

- No comments received

Comments on amended proposals (15.02.2022)

- Object
- The introduction of residential, sensitive receptors so close to an environmental permitted site creates a clear, significant conflict that could well restrict and prevent the business from continuing due to regulation
- As an existing business we should not have unreasonable restrictions placed on the farm as a result of this residential development permitted
- Suitable mitigation within the development would be impracticable for mitigating odours and difficult for noise control
- The farm provides rural employment and is part of a larger employment and economic footprint in Norfolk which would be at high risk should the development be permitted
- The farm is part of the essential food infrastructure for the UK and requires local farms to reduce carbon impacts and global warming. If this farm were restricted other supplies would increase travel and the carbon footprint of the activity.

Comments on amended proposals (23.02.2023)

- Objection having regard to information submitted by the NHL in January 2023, with focus on the predicted interrelationship between the existing poultry farm and the proposed development in relation to noise and odour.
- NHL's noise impact assessment acknowledges that all phases of the proposed housing would be impacted adversely by noise arising from poultry farm operations.

- Most suggested amelioration measures would require changes at the farm introducing restrictions on established farm operations in order to limit the impact of noise generating activities.
- The only measure that could be implemented by NHL would be the noise adviser's suggestion to look at house orientation, provision for double glazed windows and alternative means of ventilation.
- This approach to assessment is against the NPPF's agent of change principle.
- The amelioration measures proposed are operationally impractical for Banham and their landlord to accept.
- The solution is NHL must amend the siting of housing in the proposed development scheme so that it is situated well outside of the area of risk for adverse noise impact.
- In doing so the LPA should be mindful that NHL and its advisers may have presented an optimistic picture of the noise impact zone.
- Unless NHL amends the proposed development scheme to ensure there would be no future noise conflict between the poultry farm and residents of newly constructed homes then Banham must maintain objection because of the business harm it would do to the operations of their tenant Banham and ongoing beneficial use of the farm complex.
- NHL updated odours assessment acknowledges that there would be adverse odour from farm operations on proposed housing development, particularly in Phase 3 located to the northeast of the poultry farm where odour concentrations would have a significantly adverse impact on living conditions.
- Suggestion in the odour assessment that the LPA could condition changes at the poultry farm to address the risk of adverse odour impact on housing is impractical and would lead to the imposition of an unreasonable planning condition.
- Measures proposed in the odour report are too narrow in focus. No allowance for variable weather conditions or consideration to outdoor recreation spaces between the new housing and the established poultry farm which has a medium sensitivity to odour.
- As it stands, the odour assessment predicts significant adverse impact on large areas of proposed housing, fails to address the potential for adverse impact on amenity areas, and makes clear that the only practical solution is to significantly cut back the extent of development to address odour risk.

4.49 Norfolk Local Access Forum

Comments on amended proposals (09.02.2023)

- Fully endorses NCC March 2022 concerns.
- Refer to Appendix 4.1 Parameter Plans: Long Stratton Design Code, January 2022 [Revised January 2023]. Comparison of page 8 (showing the existing network of public rights of way) with page 29 showing the proposed routes clearly shows how the road as planned will significantly reduce the ability of people in Long Stratton to access the network to the east of the planned road. Request that the crossings of the proposed road are reconsidered to increase connectivity for all users.

4.50 SNC Environmental Waste Services

Comments on amended proposals (16.02.2023)

- Thank you for the refuse vehicle tracking plans provided. We will only access roads that are built to an adoptable standard as detailed by NCC Highways. Please detail which roads will be offered for adoption.

- Bin collection points: Please provide a plan for the development which details bin storage and bin collection points for all properties. All bin storage points should have space for at least 3 bins per property. All bin collection points should have space for a minimum of 2 bins per property. The bin collection points where possible should be located at the curtilage of the properties. However where a property is located on a private drive, the collection point should be located adjacent to the nearest highway
- Street cleansing: Please ensure adequate public dog and/or litter bin provision is detailed site, in particular on the open spaces around the development

4.51 Neighbour Representations (summarised)

A total of 33 representations have been received, of which approx. 2 support the proposals and approx. 13 object to the proposals. The remaining public comments neither objected or supported but expressed various concerns with the proposed development. These relate to both the original and amended proposals and in some instances are from the same address as a result of re-consultation). The comments are summarised by topics as follows:

Highways:

- St Michaels Road will be a 'rat run'
- Concern that the bypass won't be open until all properties are sold
- Safe crossings for pedestrians/cyclists
- Brand's Lane not taken into account in TA
- Western relief road: concern it is not large enough to take traffic away from current A140
- Noise, Light, Air Pollution and vibration
- Northern roundabout at Church Lane: Noise and sound attenuation, air pollution, light pollution; vibration; Grade II listed building
- Lower speed limits required on village lanes to discourage motorists to use these instead

Community/Dwellings:

- Being overlooked and loss of privacy
- Pollution
- Village ruined by buildings – loss of local identification and destruction of significant historic landscape and harm to grade II listed buildings
- Existing stress on community amenities and infrastructure
- West housing development appears to be the first to happen and this requires none of the bypass that we need in Long Stratton
- Lack of infrastructure to support development
- Biodiversity loss
- Wastewater concerns
- Opportunity for improvement
- Bypass is needed.
- Agree that a bypass is needed
- All amenities need to be in place prior to housing
- Serious consideration is needed for health provision
- Concerns regarding existing footpaths and rights of way
- Loss of nesting sites for Skylarks and yellowhammers
- Provision of bypass beneficial but negated by number of new homes and subsequent increase in vehicles
- Road safety: request that the existing a140 does not terminate at Wild Rose Farm and rather is left in place for an additional short distance further south to enable residents safe vehicular access on to a dead-end byroad not directly onto the main trunk road as is presently indicated
- Roundabout next to Grade II listed cottages
- Some provision specific for Scouting and Girlguiding to provide opportunities for both young people and adults.

- Parking and congestion
- Impact on hedgehogs
- Four roundabouts could lead to significant delays
- Morning Thorpe et al surrounding villages require safe pedestrian routes into Long Stratton
- Public transport
- Water features such as ponds should be resisted
- Property speculation
- High density dwellings
- Traffic noise from roundabout and bypass
- Noise and light pollution
- Brands Lane is in poor condition and poorly maintained
- Once construction starts and completes, no vehicular, pedestrian or cycle access to Brand's Lane.

5 Assessment

Principle

- 5.1 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. Material considerations include the National Planning Policy Framework (NPPF).
- 5.2 The site forms part of land allocated for residential development in the Long Stratton Area Action Plan (LSAAP) forming part of the Council's Development Plan. The LSAAP develops the principles established by the Joint Core Strategy, formulating a vision to see:

A revitalised large village based around its historic linear street pattern and Conservation Area, growing and building on its existing broad range of jobs and services into a thriving small town. The delivery of a bypass will enable a safer and more inviting town centre with increased shops and services and an enhanced Conservation Area.

- 5.3 The AAP includes a series of policies aimed to secure the vision for Long Stratton. The principal policy is Policy LNGS1 (Land East, South-East and North-West of Long Stratton), which states:

140.1 hectares of land is allocated for housing, employment, a bypass and associated infrastructure. This allocation will accommodate at least 1,800 new homes and 9.5 hectares of local employment opportunities as shown on the Policies Map. The Allocation will accommodate approximately 1,200 dwellings and 8 hectares of employment land to the east and south-east of Long Stratton with approximately 600 dwellings and 1.5 hectares of employment land to the north-west of Long Stratton.

- 5.4 *The developer(s) of the Allocation will be required to ensure the delivery of the following:*

Masterplan and Phasing Plan

The site must be comprehensively masterplanned as a whole, taking in to account all the requirements of this policy and comply with all of the following:

- *Before any housing is permitted on this allocation there shall be a phasing and delivery mechanism that will secure the delivery of the bypass agreed with the Local Planning and Highway Authority;*
- *Delivery of the bypass before the occupation of the 250th new dwelling in Long Stratton, unless clear evidence is provided to demonstrate that the occupation threshold is unviable and a variation to this threshold which meets the other requirements of the AAP and is acceptable in highways terms is agreed by the Local Planning Authority;*
- *Delivery of a bypass within the identified corridor;*

- *Link road between the A140 and Swan Lane to be delivered before the completion of the 200th dwelling in the north-west section of the allocation with no direct access to the A140 north of the bypass junction;*
- *Delivery of a junction improvement at Hempnall Crossroads early in the development;*
- *A phasing plan which clearly identifies where key infrastructure will be provided in relation to the provision of housing. Phasing must be designed to ensure development minimises disturbance to existing residents.*

Employment Opportunities and Economic Growth

The development will provide for a range of employment opportunities, as defined by use classes B1, B2 and B8 of the Use Classes Order, on a minimum area of 9.5 hectares. The phasing, design, size and location of the site(s) will be considered as an intrinsic part of the masterplan for the wider allocation in order to provide suitable, attractive and deliverable employment sites.

Development will be permitted where it will:

- *Have direct access to the bypass (particularly for any uses generating significant volumes of traffic and/or HGV movements) or good access which does not conflict with existing or proposed housing;*
- *Avoid vehicular access through the town centre;*
- *Include appropriate design and landscaping, in particular where employment is located on land to the south-east or on an approach/gateway to Long Stratton;*
- *Be designed to avoid and if necessary mitigate any potential conflict between employment uses and housing; and*
- *Provide significant opportunities for local residents to walk and cycle to work.*

Enhanced Facilities

- *Site to include an element of mixed-tenure Housing with Care;*
- *Site to include an element of self-build if demand for such housing is demonstrated;*
- *Provision of a serviced site of at least 2.0 hectares for a new two form entry primary school and 60 place pre-school (to be provided at no cost to the local authority/ies);*

Open Space and Green Infrastructure

- *Provision of open space, including children's play space and older children/adult open sufficient to meet the needs of residents of the development;*
- *Links between the village and the countryside to the east of the bypass corridor will be enhanced for the benefit of public access and to contribute to green infrastructure;*
- *Provision of a significant buffer to the Long Stratton Waste Water Recycling Centre to be utilised for green infrastructure.*

Design Principles

- *Design of development, including the bypass to recognise the need to sustain and improve the distinctive character of Long Stratton and to be of a scale and form which respects and enhances the Conservation Area;*
- *Design of the development, the bypass and green infrastructure provision to the east of Long Stratton to respect and reflect the key features identified in the Historic Landscape Characterisation and Sensitivity Assessment (Norfolk County Council, 2009);*
- *The bypass will be designed as an integral part of the wider development in order to achieve a high quality environment;*
- *Existing grid patterns of lanes to the east of Long Stratton will be retained within new developments and beyond.*

Transport

- *Proportionally contribute to the delivery of a junction improvement at Hempnall Crossroads;*
- *The bypass to function as a strategic road connection as part of the A140;*
- *Maximise pedestrian and cycle links between land to the east and The Street/Ipswich Road, including utilising routes through Churchfields, Edge's Lane, Star Lane and Hall Lane;*
- *Investigate and implement pedestrian and cycle links from the north-west via the Cygnet House site and St Michaels Road;*

- *New vehicular link between the centre of Long Stratton and allocation land to the east and strictly limited access from existing roads;*
- *Ensure the form of development maximises the opportunities for efficient and effective public transport services.*

Site Conditions and constraints

- *As a priority, a foul water strategy to be agreed with Anglian Water and the Environment Agency, regarding the nature and timing of capacity improvements and upgrades to the foul water public sewer network and Water Recycling Centre. No more than 1,000 dwellings occupied prior to written agreement with Anglian Water and the Environment Agency regarding solutions to current capacity constraints;*
- *Any potential risk of surface water flooding must be addressed/mitigated satisfactorily through an appropriate surface water drainage scheme agreed by the Environment Agency.*
- *Safeguarding provisions in the Norfolk Minerals and Waste Core Strategy Policy CS16 relating to investigation/prior extraction of resources will apply.*

Developer Contributions

- *Site to contribute to the delivery of infrastructure and facilities in Long Stratton through S106 (for on-site infrastructure) and the payment of CIL, including public transport enhancements within Long Stratton and on the A140 corridor, bus priority at the A140/A47 junction, environmental enhancements to the village centre, to support the development and any necessary social and community facilities and public open space.”*

- 5.5 The site also forms part of the Long Stratton Neighbourhood Plan which was adopted in October 2021 which forms part of the Development Plan.
- 5.6 The report below takes each section of the allocation policy in turn to assess the compliance of the scheme against this. Before I assess the policy it should be noted there is some land excluded from the application which lies within the proposed allocation area. An area of land is excluded from the application comprising 4.6 hectares of land on the western site to be retained as agricultural land, identified as Potential Future Development Land on the masterplan.
- 5.7 A further area of 18.4 Hectares on the eastern side between Hall Lane and Parker's Lane is excluded from the east application ref 2018/0111 identified as White Land.
- 5.8 Notwithstanding these areas, the planning applications submitted propose to deliver the requirements of the site allocation in terms of the quantum of development with 600 dwellings on the western part of the allocation and 1,275 dwellings on the eastern part of the allocation, each together with the requisite employment land, the bypass and associated infrastructure.
- 5.9 The combined area of this planning application and application ref 2018/0111 amounts to approximately 172.5 hectares (including on and off-site landscaping and other accommodation works). This is more than the site allocation of 140.1 hectares and is partly due to a difference in the wording of LNSG1 and the Policies Map at Appendix 2 to the LSAAP where the Policies Map identifies more land than 140.1 hectares. The reason for this is that the original draft allocation envisaged the whole of the development being delivered on the eastern part of the allocation. However, when the western part of the allocation was included in the final allocation, the amount of development land on the west remained the same in size. As such more land is allocated for development than stated in the policy wording. Despite this it is considered that the policy text should take precedence and that the quantum of development being proposed is therefore in accordance with the allocation.

- 5.10 In recognising this and to ensure that the proposed development can be designed in such a way as to ensure that any future development of the white land can be successfully integrated with it, an indicative masterplan has been provided to illustrate how the white land could potentially be developed and how it could be integrated successfully with the development for which planning permission is sought. On this basis, whilst it would be preferable for the white land to form part of this planning application, the provision of an indicative masterplan is considered an acceptable approach to show how the remainder of the allocation could potentially come forward and be integrated into this development should this come forward at a later date. This application would be subject to a separate planning application and determined on its own merits in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, taking account all of the material considerations relevant at that time and any necessary planning obligations, including infrastructure capacity and delivery as well as any conflict with the limit on dwellings numbers.
- 5.11 Turning back to the allocation, the assessment will now address each section in turn and extracts are duplicated below for ease of reference.

Masterplan and Phasing Plan

- 5.12 This section within the allocation has the following requirements:

The site must be comprehensively masterplanned as a whole, taking in to account all the requirements of this policy and comply with all of the following:

- *Before any housing is permitted on this allocation there shall be a phasing and delivery mechanism that will secure the delivery of the bypass agreed with the Local Planning and Highway Authority;*
- *Delivery of the bypass before the occupation of the 250th new dwelling in Long Stratton, unless clear evidence is provided to demonstrate that the occupation threshold is unviable and a variation to this threshold which meets the other requirements of the AAP and is acceptable in highways terms is agreed by the Local Planning Authority;*
- *Delivery of a bypass within the identified corridor;*
- *Link road between the A140 and Swan Lane to be delivered before the completion of the 200th dwelling in the north-west section of the allocation with no direct access to the A140 north of the bypass junction;*
- *Delivery of a junction improvement at Hempnall Crossroads early in the development;*
- *A phasing plan which clearly identifies where key infrastructure will be provided in relation to the provision of housing. Phasing must be designed to ensure development minimises disturbance to existing residents.*

- 5.13 Policy LNGS1 of the LSAAP makes specific reference to the masterplanning and phasing of the planned development as set out above.
- 5.14 Para 5.9 of the LSAAP states that “*The JCS (Policy 10 and Infrastructure Framework project T3) identifies that the bypass is a direct requirement of growth in Long Stratton and a pre requisite for the scale of growth identified for the settlement. Given that the bypass is necessary in order to enable housing development to take place on LNGS1, a substantive element of funding is expected to come from the developer.*”
- 5.15 Para 5.15 states “*Subject to agreement from the Local Planning Authority, if further viability evidence demonstrates that that the occupation threshold of 250 dwellings would impinge upon the delivery of the bypass, a variation to this threshold will be considered, providing that this does not compromise the other requirements of the LSAAP and would not cause unacceptable highways impacts.*”

- 5.16 It is noted that the detailed design of the bypass will be secured as part of application ref 2018/0111 and delivered by Norfolk County Council prior to the occupation of 250th dwelling as identified in Policy LNGS1 across both planning applications. This application and application ref 2018/0111 are required to deliver the bypass and this will be secured by way of a shared S106 for this application and 2018/0111. A condition is proposed to allow for up to 250 homes to be occupied prior to the completion of the bypass in accordance with the triggers of the allocation.
- 5.17 As noted in the report for planning application ref 2018/0111, the proposed bypass scheme is proposed to be funded by contributions from both Central Government and local contributions. The Department for Transport has committed to funding £26.1m (subject to submission of a successful Full Business Case). Local contributions have been sought from both the developer and Greater Norwich Growth Board (GNGB). The developer has committed to £4.5m, alongside £10m from GNGB funded through Community Infrastructure Levy (CIL). The remainder of the £46.23m cost estimate will be underwritten by NCC until the remaining local contributions have been confirmed.
- 5.18 The proposed scheme is programmed to commence in April 2024, subject to the necessary approvals and planning permission being granted, and currently has a construction duration of 18 months.
- 5.19 As noted above, the policy also requires a link road to be provided between the A140 and Swan Lane. A trigger is recommended to be conditioned as part of this planning application requiring that this road is completed before the 100th dwelling is occupied in order to facilitate access to the development, relieve congestion on the Swan Lane/A140 junction and be a practical measure to discourage 'rat running' along St. Michaels Road.
- 5.20 Improvements to the Hempnall junction area are also required. However, these have already been implemented and a roundabout was constructed and fully opened in November 2019. As such this part of the policy is met.
- 5.21 With regards to phasing and delivery of key infrastructure, a Phasing Plan and Phasing & Delivery Statement has been submitted with this planning application setting out the proposed phasing and delivery of the site. A condition is also recommended requiring that a detailed infrastructure phasing plan is submitted setting out where key infrastructure will be provided in relation to the provision of housing across the development to ensure development minimises disturbance to existing and new residents.
- 5.22 Infrastructure directly associated with the bypass as part of application ref 2018/0111 (including bunding and surface water drainage attenuation) is proposed to be constructed and delivered concurrently with the bypass.
- 5.23 Infrastructure directly related to the outline components of this application, including foul and surface water attenuation basins, recreational open space, green infrastructure, and community hubs are proposed to be dealt with through a combination of S106 obligations, conditions and subsequent reserved matters applications which will deliver these elements at a future date.
- 5.24 Detailed Phase 1 (West) housing development, associated recreational open space and the western relief road between the A140 and Swan Lane, will be constructed/delivered concurrently with the housing, and in accordance with the S106 and LSAAP. This enables up to 250 dwellings to come forward before the completion of the bypass as identified by Policy LNGS1 and as such could come forward separately from application ref 2018/0111, subject to the completion of the western relief road before the 100th dwelling is occupied as recommended by the Highway Authority.
- 5.25 Other matters related to highways will be addressed in a later section of the assessment.

- 5.26 In summary, officers are satisfied that the six requirements of the “Masterplan and Phasing Plan” section of the allocation have been met by this application.

Employment Opportunities and Economic Growth

- 5.27 This section within the allocation has the following requirements:

The development will provide for a range of employment opportunities, as defined by use classes B1, B2 and B8 of the Use Classes Order, on a minimum area of 9.5 hectares. The phasing, design, size and location of the site(s) will be considered as an intrinsic part of the masterplan for the wider allocation in order to provide suitable, attractive and deliverable employment sites. Development will be permitted where it will:

- *Have direct access to the bypass (particularly for any uses generating significant volumes of traffic and/or HGV movements) or good access which does not conflict with existing or proposed housing;*
- *Avoid vehicular access through the town centre;*
- *Include appropriate design and landscaping, in particular where employment is located on land to the south-east or on an approach/gateway to Long Stratton;*
- *Be designed to avoid and if necessary mitigate any potential conflict between employment uses and housing; and*
- *Provide significant opportunities for local residents to walk and cycle to work.*

- 5.28 This application proposes 1.5 hectares of Class B1 employment land. A further 8 hectares of employment land for uses within Classes B1, B2 and B8 is proposed as part of the east application ref 2018/0111.
- 5.29 The development provides for a range of employment opportunities as required by the LSAAP. The design, size and location of which will be subject to future reserved matters applications based on the principles set out in Policy LNGS1.
- 5.30 In terms of the location of the west employment area, this is identified on the masterplan as Phase E1 and is located to the south west of the development close to existing commercial uses (around Swan Lane).
- 5.31 It is proposed to access the land via a simple priority-controlled T-junction. Access is prioritised through a link road and onto the A140 (north) and bypass, with HGV access to Swan Lane/High Street to be controlled through suitable signage/management to minimise vehicular access through the town centre. Whilst this will not completely rule out vehicular access through the town centre, it is considered that the western relief, which connects the employment area to the northern roundabout with the A140, will provide a more desirable route to the employment area than via Swan Lane and the High Street. This along with suitable traffic management and signage, is on balance considered to be acceptable in the context of Policy LNGS1.
- 5.32 Regarding the need to avoid any potential conflict between employment uses and housing in terms of any adverse impacts on residential amenity, the detailed design of reserved matters will need be controlled in such a way to ensure that the relative relationship of employment uses and housing avoids, and if necessary, mitigates any potential conflict between the uses. These impacts and the compatibility of uses will be further assessed at the reserved matters stage to ensure compliance with the LSAAP and the development plan. Conditions are also recommended requiring a noise assessment to be submitted concurrently with future reserved matters applications to ensure appropriate mitigation is identified and implemented if necessary.

- 5.33 Phasing and detailed design of the employment land development will be governed by future reserved matters submissions, which will need to have regard to the submitted masterplan and design code principles. Whilst the LSAAP does not make a specific requirement in terms when employment land will be needed in Long Stratton, it recognises that new employment opportunities and the delivery of this employment land is necessary to ensure the long term sustainability of Long Stratton. The servicing of the employment land at an early stage will therefore be important to maximise the opportunities of this coming forward to support the housing growth. The marketing and delivery of the employment land is secured by condition to be agreed by the Local Planning Authority to ensure it comes forward at an appropriate time and that it is delivered alongside the housing proposals and infrastructure phasing plan.
- 5.34 In terms of connectivity between the employment land and residents, a footway/cycleway is proposed along the western relief road linking it with the residential phases of development and routes into Long Stratton centre via Swan Lane and the High Street. A network of pedestrian and cycle routes is also proposed as part of the masterplan which provide links and connectivity throughout the scheme.
- 5.35 As such, when having regard to the masterplan, which identifies 8 hectares of employment land to the south-east of Long Stratton (E2 and E3) and 1.5 hectares to the south west (E1), it is considered that the planning application provides sufficient certainty that the development can provide for a range of employment opportunities as well as meeting the objectives set out in Policy LNGS1 subject to appropriate triggers for the submission of reserved matters for the site and provision of the land as serviced employment land. To ensure the reserved matters come forward on the employment site in a planned and coordinated way and that the relationship between the proposed employment land and existing dwellings is respected, a condition is recommended requiring parameter plans to be submitted concurrently with the first reserved matters for the E1 employment area.
- 5.36 On the basis of the above, officers consider that the aims of the section of the allocation relating to employment have been met.

Enhanced facilities

- 5.37 This section within the allocation has the following requirements:
- *Site to include an element of mixed-tenure Housing with Care;*
 - *Site to include an element of self-build if demand for such housing is demonstrated;*
 - *Provision of a serviced site of at least 2.0 hectares for a new two form entry primary school and 60 place pre-school (to be provided at no cost to the local authority/ies);*
- 5.38 In terms of the requirements of the LSAAP to provide an element of self-build (if demand for such housing is demonstrated), given the outline nature of the application it is considered that the application and masterplan is sufficiently flexible that self-build housing can be provided either within the wider site allocation or at the detailed application stages should this be required as part of the housing mix and demand at the time. Current demand for self-build dwellings in South Norfolk suggests that there is a demand for such dwellings and as such this will need to be considered as part of future reserved matters applications. It is recommended that this is included in the S106 and a scheme is submitted concurrently with each reserved matters as part of the housing mix to include self-build housing should demand be demonstrated.
- 5.39 With regards to mixed-tenure Housing with Care, there is ongoing need for such accommodation as identified in Policy LNGS1. The Policy requires an element of mixed tenure Housing with Care to be provided within the development. The current masterplan provides no provision for this however the applicant has not sought to demonstrate that this is not needed in terms of housing need, that it would impact viability, nor that it would not be deliverable. On the basis of the ongoing demonstrable need for Housing with Care a condition is recommended, requiring a

Housing with Care scheme to be submitted to and approved by the Local Planning Authority prior to the commencement of any dwelling on any phase setting out how this will be secured, its location within an identified residential phase as well as a timetable for delivery within the relevant phase it is located.

- 5.40 In terms of future capacity of educational facilities within the local area, which include primary and high schools, NCC Education have reviewed the proposals and has confirmed that there would currently be insufficient places available at local schools to accommodate the children arising from this development.
- 5.41 To mitigate this impact, NCC Education previously advised a new primary school would be necessary to be open around occupation of 400 dwellings across both this site and the east planning application. After considerable discussions with the applicant and NCC Education, it has been agreed to transfer served land for a new primary school site on occupation of 150 dwellings on the eastern site ref 2018/0111. This is because from a practical point, it would not be reasonable to create a ransoming of the West site in favour of the East site by requiring a trigger to deliver a school on land that the applicants do not own or control. Nor would it be desirable to have two school sites across both planning applications.
- 5.42 It is important to note that whilst this could result in insufficient school places in the local area in the short term, NCC Education have confirmed that they will be able to manage this through the annual admissions round and in-year admissions processes to ensure sufficient school places are available arising from this development.
- 5.43 The costs of constructing the school will be met through CIL funding relating to the two applications. CIL funding would also be required to support additional places in the Early Education sector and at Long Stratton High School to contribute towards the expansion and improvement of existing facilities.
- 5.44 The proposed development will also lead to increased pressures on a range of other community venues including libraries, community meeting space and leisure provision.
- 5.45 Policy R20 of the LSNP supports the provision of a new town hall or community meeting space. The Neighbourhood Plan requires the community space to be centrally located and accessible in terms of public transport and walking and cycling routes, as well as being capable of providing overflow town-centre parking and off-street parking. Furthermore, Policy SC6 supports new community facilities, where they can easily be accessed by the communities they are intended to serve.
- 5.46 The masterplan identifies a new site (CH2) for potential sports pitches, general open space and community facilities located to the west of the village. Serviced land for potential community facilities will be secured at nil cost to be secured by the S106 and will be offered to Tharston Parish Council. A further community hub (CH1) is identified on the east planning application site ref 2018/0111 located more centrally within the settlement, in accordance with the general objectives of LSNP R20 and SC6.
- 5.47 Turning to other leisure provision i.e., swimming pools and sports hall courts etc, there is no requirement in the LSAAP to provide an indoor sports facility. However, it is noted that LSNP supports the provision of a new swimming pool facility but does not indicate where or how.
- 5.48 These requirements could be met through the expansion/improvement of existing local facilities. Furthermore, indoor sports and/or off-site sports provision are included in South Norfolk's published Annual Infrastructure Statement 2019-2020, which identifies the expansion of new and enhanced facilities in Long Stratton.

- 5.49 As such and based on the scale of the residential development and recent investment in additional facilities at Long Stratton Leisure Centre, it is considered that the increased demand from the proposed development on leisure provision, can be adequately catered for through the provision of the above enhanced facilities.
- 5.50 With regard to existing library facilities, the increased demand is to be met by the expansion of the existing Long Stratton library by funding through the Community Infrastructure Levy (CIL).
- 5.51 Subject to the above being secured through a combination of the S106 and CIL funding, the impacts of the development in terms of the enhanced facilities identified in the allocation are adequately met.
- 5.52 In terms of Environmental impacts as assessed in the submitted ES, an assessment of the likely significant environmental effects arising from the proposals in relation to socio-economic issue has been undertaken. This has included an assessment of the potential impacts in terms of housing and employment, along with impacts upon social infrastructure including schools, health, leisure, community facilities and public open space provisions.
- 5.53 The proposed development will have a number of potential positive impacts, including through the provision of new market and affordable homes as set out further below, whilst the provision of employment generating land uses will have economic and employment benefits. However, the delivery of this new housing will lead to an increase in the population, which will in turn have impacts, both positive and negative, on social and community infrastructure including school and health care provision, and that will require mitigation.
- 5.54 The potential likely significant adverse impacts that have been identified, prior to mitigation, cover: education; health services; community facilities and public open space. In response to this, the measures as set out in this report which directly respond to these potential adverse impacts which ensure that the development does not have a negative impact.

Open Space and Green Infrastructure

- 5.55 This section within the allocation has the following requirements:
- *Provision of open space, including children's play space and older children/adult open sufficient to meet the needs of residents of the development;*
 - *Links between the village and the countryside to the east of the bypass corridor will be enhanced for the benefit of public access and to contribute to green infrastructure;*
 - *Provision of a significant buffer to the Long Stratton Waste Water Recycling Centre to be utilised for green infrastructure.*
- 5.56 With regard to open space, Policy DM3.15 requires new housing development to provide adequate outdoor play facilities and recreational open space commensurate with the level of development proposed in order to meet the need of occupants and this is informed by the Council's adopted Open Space SPD which provides the standards for open space provision as well as the minimum amounts of recreational open space and play facilities to be provided. Policy GI16 of the LSNP sets out standards for recreational open space in accordance with the requirements of Council's Open Space SPD and Policy GI17 sets out the priorities for delivering Green Infrastructure.
- 5.57 The application proposes children's and adult play facilities in accordance with the Council's adopted standards, plus areas of additional space such as strategic landscape and buffers etc. This equates to a minimum requirement of approx. 6.75 hectares of recreational open space on the western site based on the indicative mix of dwellings proposed and proposed 213 dwellings as part of the full permission

- 5.58 The submitted landscape masterplan, design code and open space plan, illustrate how these areas could be accommodated on site by providing both formal and informal open space, children's play areas, green corridors (linear park) and natural/semi-natural areas (ecological networks). These form part of the landscape-led approach to the proposed development, providing scope to deliver high quality green infrastructure alongside the built development.
- 5.59 These spaces comprise of the following key components as part of the outline planning application area:
- Northern Gateway (formal landscaping with a large 'gateway green' and circular clumps of trees positioned as 'gateway markers' at the entrance to the village).
 - Extensive open space along the Picton Stream valley, which provides recreational links between local roads (Swan Lane and Brand's Lane) and the wider network of footpaths to the west of Long Stratton.
 - Primary and secondary landscape structure (open spaces, green links, SuDS, strategic tree and hedgerow planting in the larger open areas, existing hedgerows repaired).
 - Tertiary landscape structures (neighbourhood ponds, verges, street tree planting and any other incidental open spaces within the development.)
- 5.60 In terms of how the open space will be delivered, the timing of this will be secured by the S106. Officers consider that some elements of open space where they straddle phases and deliver key joined up pieces of green infrastructure may need to be delivered as one entity. The provision of open space and timing of delivery will be secured by the Open Space Plan and detailed in the S106 as part of the detailed open space schemes for each reserved matters, to ensure it comes forward at the appropriate stage.
- 5.61 With regard to the location of the formal recreation space, which could accommodate football pitches and formal play space, these are located to the north of CH2 and phase 2 shown on the submitted Open Space plan. The location has been determined by the site constraints and Tharston Parish Council's desire for formal pitches to be provided on CH2 as well as future plans for other facilities in this location. Should any further formal open space provision be required as part of the future housing mix, this will be provided as part of future phases of development in accordance with the Council's Open Space Supplementary Planning Document (DPD), secured by condition and the S106.
- 5.62 Furthermore, a significant landscape buffer, containing flood storage areas is proposed between the Long Stratton Waste Water Recycling Centre as required by Policy LNGS1.
- 5.63 Regarding future maintenance and management of all policy compliant open space, a financial contribution is being proposed (to be included in the S106) to meet capital and maintenance costs in accordance with the Council's adopted SPD.
- 5.64 In terms of any additional space such as strategic landscape, attenuation lagoons, wetland SUDs features, woodlands, and other Green Infrastructure, which is necessary to make the development acceptable in planning terms, no further maintenance contribution is being proposed beyond what is required to meet the required open space adopted standard. It is anticipated that these areas will be adopted and managed by a management company.
- 5.65 In terms of who will be responsible for the management of recreational open space, whilst the Council cannot ultimately dictate who adopts it, it is the Council's preference that the policy compliant open spaces be adopted by the Parish/Town Council or an appropriate community association for the lifetime of the development along with a commuted sum. On this basis a cascade is proposed to be included in the S106 suggesting that all policy compliant open space be offered to the Parish/Town Council in the first instance along with a financial contribution calculated in accordance with the Council's open space standards. In the event that the Parish/Town Council or a community association or similar body do not wish to adopt the land, the developer will either then retain it or pass it to a management company.

- 5.66 Members should note that both Tharston Parish Council and Long Stratton Town Council have indicated that they would like to take on the recreational open spaces, except for drainage features and other elements relating to strategic landscaping which will ultimately be adopted and managed by others. As such and subject to an appropriately worded clause in the S106 to enable the transfer of any elected open space (excluding SuDs features etc) to the relevant body, the proposals are considered acceptable regarding the amount and types of open space and future maintenance and management options.
- 5.67 A Landscape and Ecological Management Plan (LEMP) has also been submitted as part of the application setting out the overarching principles for landscape management that will apply to the whole of the new development. Precise details for the management of the residential development will be conditioned and come forward as part of the detailed planning applications.
- 5.68 Taking the above into account, it is considered that the proposals meet the requirements of the allocation, Policy DM3.15 and LSNP in terms of the requirements for recreational open space and GI16 of the LSNP.
- 5.69 In terms of Green Infrastructure, this is assessed in more detail in the Ecology section of this report.

Design Principles

- 5.70 This section of the allocation requires the following:
- *Design of development, including the bypass to recognise the need to sustain and improve the distinctive character of Long Stratton and to be of a scale and form which respects and enhances the Conservation Area;*
 - *Design of the development, the bypass and green infrastructure provision to the east of Long Stratton to respect and reflect the key features identified in the Historic Landscape Characterisation and Sensitivity Assessment (Norfolk County Council, 2009);*
 - *The bypass will be designed as an integral part of the wider development in order to achieve a high quality environment;*
 - *Existing grid patterns of lanes to the east of Long Stratton will be retained within new developments and beyond.*
- 5.71 In addition to this section of the allocation, Policy 2 of the JCS and Policy DM3.8 of the Local Plan require new development to be of a high standard of design. Policy LNGS1 sets out the design principles of the development, including the bypass, in order to achieve a high quality environment. Policy DC8 and DC10 of the LSNP are also relevant and sets out the design and character policies for Long Stratton.
- 5.72 In response to comments received from the Council's Senior Heritage and Design Officer, the Town Council and other consultees, the applicant has amended and updated the planning application, including the Design Code.
- 5.73 Further information has been provided regarding understanding the local context and recognising the value of innovative and sustainable design. Reference is also made to the South-Norfolk Place-Making Guide (2012) and the Long Stratton Design Guide (2020), which is intended to help inform the design of the development in conjunction with the Design Code, including the use of locally distinctive materials to provide a sense of place.
- 5.74 In terms of the content of the code, the document sets out the guiding principles and a range of design parameters and rules to ensure a high quality development, whilst allowing some flexibility as long as design quality is retained.

- 5.75 The code is based on a landscape-led approach and sets out how a hierarchy of green spaces will provide different character types across the site responding to the existing landscape structure. These structures comprise of Primary Landscapes, including an Eastern Linear Park green buffer and bunding along the new bypass; Secondary Landscapes, including open space within the site, sports pitches and sustainable drainage systems, and Tertiary Landscapes, including neighbourhood ponds, verges, street tree planting and any other incidental open spaces within the development. Information is also provided regarding green infrastructure, pedestrian and cycle movement and sustainable drainage.
- 5.76 In addition, the code identifies a number of character areas, which set out the detailed design requirements of the development for building density, scale and height, as well as the design principles relating to each of the character areas. The section also contains information on street types, parking, building design and materials, and hard landscaping.
- 5.77 Following changes to the masterplan and Design Code, officers are now satisfied that the submitted information is acceptable and will ensure that subsequent phases of development will achieve an acceptable standard of design that reflects and relates well to each other meeting the design objectives of the AAP and LSNP.
- 5.78 It is recommended that a condition is included requiring that developers complete a design code compliance statement to show that they have applied the codes to their detailed designs or provided a higher standard of design. Applicants will also be expected to demonstrate how their proposals comply with the South-Norfolk Place-Making Guide (2012) and the Long Stratton Design Guide (2020).
- 5.79 In terms of the detailed layout for the phase 1 residential scheme, comprising 213 dwellings, the Council's Senior Heritage and Design Officer has reviewed the proposals and following amendments considers that they represent an acceptable form and arrangement of development in this location. Regard has been given to the form and character of existing and proposed development as part of the Design Code, which has helped to define the proposals.
- 5.80 The masterplan and design code is based on the design principles set out in the Long Stratton Neighbourhood Plan Design Guidelines in relation to strengthening and enhancing Long Stratton's historic core; integration with the bypass; pedestrian and cycle connectivity; edge treatments between the proposed and existing settlements; road types and vehicle access; vehicle parking; built form, including architectural details and material palette; and sustainability.
- 5.81 The dwellings generally use traditional forms and materials and have been designed to reflect the general style and character of the area, forming a logical part of the overall west development proposals. The height, scale and form of the proposed buildings are considered appropriate for the site and its context, while ensuring the efficient use of land.
- 5.82 In summary, the resultant masterplan, design code and detailed phase 1 site layout, is considered to be an acceptable approach to developing the site and in principle complies with Policy DM3.8, Policy LNGS1 and the LSNP.

Transport

- 5.83 This section within the allocation has the following requirements:
- *Proportionally contribute to the delivery of a junction improvement at Hempnall Crossroads;*
 - *The bypass to function as a strategic road connection as part of the A140;*
 - *Maximise pedestrian and cycle links between land to the east and The Street/Ipswich Road, including utilising routes through Churchfields, Edge's Lane, Star Lane and Hall Lane;*
 - *Investigate and implement pedestrian and cycle links from the north-west via the Cygnet House site and St Michaels Road ;*

- *New vehicular link between the centre of Long Stratton and allocation land to the east and strictly limited access from existing roads;*
- *Ensure the form of development maximises the opportunities for efficient and effective public transport services.*

- 5.84 Beyond securing details of the bypass, as outlined earlier in the assessment as part of application ref 2018/011, in respect of other transport matters, the proposal is assessed as follows:
- 5.85 With regard to the access strategy for the site, this comprises of the Western Relief Road; Northern roundabout and access to the A140; and detailed layout for the Phase 1 residential development (comprising 213 dwellings) which are all in full.
- 5.86 Following the submission of this application in 2018, discussions have taken place with the Highway Authority which have resulted in amendments to the proposed western relief road and to the detailed housing layout within phase 1, consisting of 213 dwellings.
- 5.87 The proposed access strategy is to focus traffic outwards towards the bypass and western link road to avoid unnecessary trips within Long Stratton.
- 5.88 The western link road will be constructed from Church Lane through the development site connecting with Swan Lane to the south, including a shared cycle/footpath on the southern side of the carriageway. It is proposed to realign Swan Lane into the site to join the western link. A scheme for the design of this section of the western link road will be secured by condition.
- 5.89 The application site currently has one Public Right of Way running through the site linking the A140 (east) to the western boundary of the site, which will be incorporated into the design of the site.
- 5.90 The intention is that the access strategy will direct traffic away from the existing town centre and onto the bypass and the wider A140 corridor to avoid unnecessary vehicular trips within Long Stratton, thus reducing congestion and journey times as well as enhancing the existing town centre.
- 5.91 In terms of car parking relating to the outline phases of development, this is proposed to be provided in accordance with the Norfolk County Council Parking Standards and determined as part of future reserved matters applications.
- 5.92 The Highway Authority have assessed the information submitted as part of this revised application in relation to the full detailed element of the application and has confirmed that the proposed layout and parking requirements are considered to be acceptable.
- 5.93 They have also considered Long Stratton Area Action Plan (LSAAP) which sets out that a minimum of 1800 dwellings will be built in locations which support the form and function of the town and which will deliver the bypass and that the bypass should be completed prior to 250 dwellings being occupied.
- 5.94 In light of this, a condition is recommend requiring that the occupation of 250 dwellings (across both this application and application no 2018/0111) is the trigger for the bypass to meet the requirements of the LSAAP.
- 5.95 In terms of the link road connecting Swan Lane to the proposed new northern roundabout of the Long Stratton bypass, the northern roundabout will need to be constructed regardless of the bypass as it will form the connection from Swan Lane via the new western link to the A140. The western link road and the northern roundabout will need to be constructed prior to the 100th dwelling being occupied of this development. A further condition is also recommended for the southern end of the western link road which will be required to access the site. This will involve a

new junction/realigned Swan Lane and a section of the western link road between the new junction and the furthest access road into the site (as per this element of the application). A scheme for the design of this section of the western link road will be required by condition prior to commencement of development and will be required to be delivered prior to first occupation.

- 5.96 In light of the above and having assessed the amended proposals in terms of the issues raised in Section 4 of this report, I am satisfied that the proposals are in accordance with Policies DM3.11 and DM3.12 of the Local Plan, the AAP and Policy SC4 and SC5 of the LSNP, subject to conditions recommended by the Highway Authority relating to both the outline application and specific conditions relating to the delivery of the western link road and detailed housing layout.
- 5.97 Furthermore, the submitted Transport Assessment demonstrates that in accordance with the NPPF, the traffic associated with the proposed development does not represent a severe transport impact and it has been demonstrated that the residual cumulative impacts on the road network would not be severe.
- 5.98 Highways England has also commented on this application given the relatively close proximity of the A47 and they have confirmed that they have no objection to the scheme.
- 5.99 It is also recommended that a Travel Plan is submitted and implemented to ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment as well as encouraging walking and cycling. This will be secured by condition and the S106 Agreement along with a bond to secure a sum of money per dwelling negotiated with the Norfolk County Council for the delivery of the Travel Plan.
- 5.100 Turning to the requirements for enhanced walking and cycling facilities, the LSAAP requires the development to improve access to/from existing and new key services and facilities, such as the town centre, schools, medical facilities, leisure facilities/open spaces, and employment opportunities, as well as facilitating enhanced connectivity to the wider countryside and surrounding villages. Furthermore, where appropriate, it also requires the development to allow for easy bus circulation, maximising the number of people able to walk to/from bus routes.
- 5.101 The LSAAP goes on to identify various facilities to be delivered through S106 (for on site infrastructure) and the payment of CIL including public transport enhancements within Long Stratton and on the A140 corridor, bus priority at the A140/A47 junction and environmental enhancements to the village centre, to support the development and any necessary social and community facilities and public open space. However, these do not include the provision of on-carriageway cycle facilities.
- 5.102 The Long Stratton Neighbourhood Plan also requires development to maintain or enhance good connectivity in terms of sustainable connectivity and direct, safe and attractive walking and cycling routes between new neighbourhoods and the existing Long Stratton community and outlying areas. It also identifies measures towards environmental enhancements in the town centre, such as improved pedestrian permeability and access for cyclists in line with LNGS1, and to help establish The Street as the heart of the town.
- 5.103 The Highway Authority has maintained throughout the application process that this development should provide not just facilities within it for walking and cycling but also connect to and provide facilities that are off site and are considered as direct mitigation.
- 5.104 The submitted Masterplan and Design Code have sought to establish the principles in relation to pedestrian and cycle connectivity as well as supporting the delivery of the objectives of the Long Stratton Area Action Plan and Neighbourhood Plan.

5.105 The following has been identified within this planning application to support the proposals in outline form:

- A network of safe, legible and convenient pedestrian and cycle routes throughout the scheme, connecting to key destinations such as the community hub and play spaces, and to the wider settlements of Tharston and Long Stratton and the countryside;
- a network of off-road links between and within the development areas;
- a link to St Michaels Road as well as to Trumpeter Rise and its southern boundary;
- reduced traffic flows through Long Stratton Town Centre.

5.106 In terms of pedestrian and cycle connectivity within the development, the masterplan and Design Code shows how safe, legible and convenient pedestrian and cycle routes could be created throughout the scheme, connecting to key destinations such as the school, the community hub and play spaces, and to the wider settlement of Long Stratton and Tharston. As such and subject to the detailed design of these routes being agreed as part of any future reserved matters applications and conditions requiring detailed plans of the roads, footways, cycleways to be submitted and details of delivery and timing of road infrastructure within the site as part of the infrastructure phasing plan, it is considered that the relevant parts of the AAP and LSNP have been met and that the proposals comply with the Development Plan in this regard. Conditions are also recommended to secure pedestrian/cycle links up to the boundary of the site to St Michaels Road as well as to Trumpeter Rise and its southern boundary.

5.107 With regards to Public Rights of Way (PROWs), there are a number of PROWs in the north-west of Long Stratton, namely Long Stratton FP 8/Tharston FP25 (FP8/25) and Tharston FP24, FP26 and FP31.

5.108 Norfolk County Council Public Rights of Ways Team have reviewed these proposals and following amendments to the scheme, including an updated plan showing how a crossing on the western relief road will facilitate the continuation of FP8/FP25, have commented that they are satisfied that the existing PROWs will not be compromised and that they been adequately incorporated into the future design of the scheme.

5.109 Subject to the above and further information at the reserved matters stage to ensure that the proposed cycleways and footways connect into existing PROWs, the proposals are considered acceptable in terms of meeting the objectives of the AAP and LSNP.

5.110 Turning to enhanced connectivity the LSAAP requires good walking and cycling links to be provided linking the new development to the town centre. This application is only currently proposing to bring forward sustainable links within the development itself and to ensure that they connect to existing footway links. There are no proposals to provide enhanced links such as cycling provision along the A140 or along Swan Lane. As a result, all cycle trips are on the existing highway network which run through Long Stratton and connecting roads.

5.111 As part of ongoing discussions with the developer, a number of options have been explored with the Highway Authority to consider how cycle and pedestrian routes could help to facilitate enhanced connectivity in terms of works along the A140. Whilst no scheme has been submitted by the applicant, the Highway Authority has worked up and costed a scheme to inform what improvements could be delivered along the A140, which would be secured by the S106 contribution.

5.112 Whilst it is not considered acceptable to provide no enhanced links particularly in the form of cycling provision along the A140, the applicant has offered a contribution of approx. £550k specifically towards a A140 cycle/pedestrian scheme.

- 5.113 This contribution would not be sufficient to deliver the scheme in its entirety, however having regard to the overall viability of the development together with potential future funding opportunities, both the highway authority and Local Planning Authority consider that this contribution on balance, is acceptable. It is envisaged that the County Council will deliver enhanced links, particularly in the form of improving cycling provision and connectivity along the A140 and a detailed scheme (albeit the funding mechanism is not required or secured by the Councils) will be led by the public sector. As such and subject to securing the above contribution via the Section 106 agreement, the proposals are, on balance, considered to comply with the objectives of the AAP and LSNP in respect to enhanced links.
- 5.114 Furthermore, when having regard to ensuring that any such cycling provision along the A140 would not prejudice efficient delivery of future or linked town centre environmental improvement works identified in the LSNP, the proposed contributions (together with potential CIL and/or other possible funding streams), also having regard to viability, is considered an acceptable way of securing this.
- 5.115 A condition is also recommended relating to the delivery of a footway/cycle path connecting the site to the A140 along Swan Lane to secure enhanced connectivity from the development to facilities in Long Stratton, such as schools, the leisure centre and key services in the town centre, and a crossing facility at the northern end of the current A140 to connect to the proposed spine road for the eastern development to achieve sustainable links/access and connectivity between all areas of the development. Subject to the above and recommended conditions, the proposals are considered to comply with the relevant criteria of Policy LNG1.
- 5.116 Subject to conditions the proposals are, on balance, considered acceptable and comply with Policy DM3.11 and DM3.12 of the SNLP, LNGS1 of the AAP and Policy SC4 and SC5 of the LSNP.
- 5.117 In terms of environmental impacts as identified in the submitted Environmental Statement, the assessment shows that there will be a negligible effect on the highway network assessed during the construction phase. During the operation of the development there is considered to be a moderate beneficial effect within Long Stratton, including a substantial reduction in traffic volumes and delays within Long Stratton itself, but a minor adverse effect on traffic, severance, pedestrian/cycle delay, pedestrian/cycle amenity and a negligible effect on, fear and intimidation, accident & safety and public transport when considering the entire route from Long Stratton to the A140 / A47 junction.
- 5.118 The assessment demonstrates that the site is accessible and sustainable and with planned improvements built into the design of the masterplan as proposed and conditions as suggested above, is considered a suitable location to accommodate the development without adverse effect on the safe and efficient operation of either the local or strategic highway networks.

Site Conditions and constraints

- 5.119 This section within the allocation has the following requirements:
- *As a priority, a foul water strategy to be agreed with Anglian Water and the Environment Agency, regarding the nature and timing of capacity improvements and upgrades to the foul water public sewer network and Water Recycling Centre. No more than 1,000 dwellings occupied prior to written agreement with Anglian Water and the Environment Agency regarding solutions to current capacity constraints;*
 - *Any potential risk of surface water flooding must be addressed/mitigated satisfactorily through an appropriate surface water drainage scheme agreed by the Environment Agency.*
 - *Safeguarding provisions in the Norfolk Minerals and Waste Core Strategy Policy CS16 relating to investigation/prior extraction of resources will apply.*

- 5.120 The site allocation requires that as a priority, a foul water strategy to be agreed with Anglian Water and the Environment Agency, regarding the nature and timing of capacity improvements and upgrades to the foul water public sewer network and Water Recycling.
- 5.121 As part of the planning application process, detailed discussions have taken place with Anglian Water and the Environment Agency who have confirmed that they would not want to delay the first phases of development coming forward, and there is no argument that there is not sufficient capacity to treat these so it would be unreasonable to condition this.
- 5.122 Anglian Water and the Environment Agency consider that the first 3 phases of both developments (2018/0111 & 2018/0112) can commence without the need for a waste water treatment strategy (totalling 1045 dwellings). A condition is therefore recommended, requiring that, apart from enabling works, no development shall commence beyond 1000 dwellings, until a wastewater treatment strategy, in consultation with Anglian Water and the Environment Agency, covering the remaining phases of development across the site allocation has been submitted and approved in writing by the Local Planning Authority.
- 5.123 Subject to the above it is considered that proposals comply with Policy LNGS1, which is sufficient to ensure that the development can begin without delay, but without causing the sewage treatment works to go over capacity and impact the water environment. Furthermore, the proposed development flows, will be assessed by Anglian Water as part of any future reserved matters application to determine whether any further works to the local foul infrastructure is required in accordance with their regulatory and statutory responsibilities.
- 5.124 Policy DM4.2 of the SNLP and Policy JCS 1 of the JCS require new major developments to incorporate sustainable drainage systems (SUDS) to manage any surface water run-off and to minimise the risk of flooding on-site and in the surrounding area. The NPPF also requires Local Planning Authorities to ensure development does not increase flood risk elsewhere and to incorporate sustainable drainage systems in to development proposals, unless there is clear evidence that it would be inappropriate.
- 5.125 A Flood Risk Assessment and Foul and Surface Water Drainage Strategy has been submitted in support of the planning application, including other supporting information.
- 5.126 The site is located within Flood Zone 1 which has a low probability of flooding from rivers and the sea. The site is also at a low risk of surface water flooding. However, there are some areas identified as being at medium and high risk. These areas are located along Star Lane which originates from overland flow paths and the fall in topography east to west through the site, as well as to the south through the site that broadly aligns with the watercourses. It is noted that the proposed development will also result in a change in the operation of the existing land drainage systems, through the implementation of new structures (such as culverts) to accommodate the bypass and highway works.
- 5.127 To mitigate against these risks as well as ensuring wider flood risk is managed, the drainage strategy for the site proposes that surface water will discharge to on-site and surrounding drains at existing greenfield rates and surface water runoff will be attenuated on-site for events up to the 1 in 100 probability storm events including an allowance for climate change. The strategy consists of sustainable drainage features (SuDS) such as permeable paving and attenuation areas to ensure there are robust measures in place to manage surface water before it is discharged into the watercourse. In terms of the bypass, this includes swales and drainage ditches to intercept and hold surface water and discharge to a network of flood mitigation ditches to ensure a controlled discharge at greenfield run off rates.

- 5.128 As a consequence of nutrient neutrality, the drainage strategy has been amended to include wetlands as part of the SuDS features located downstream of the proposed drainage basins and within the proposed drainage ditches associated with the residential development. The purpose of the wetlands is to treat surface water to reduce the amount of pollution entering the watercourses from the development to achieve nutrient mitigation during the initial phases of development.
- 5.129 The LLFA, Anglian Water and the Water Management Alliance IDB have been consulted on the application and following the submission of additional information and amendments, has raised no objections to the application in respect of surface water and flood issues, subject to the imposition of a condition requiring the submission of detailed designs for the surface water drainage scheme as part of future reserved matters applications, to ensure sufficient information is provided to establish that the application has an acceptable Drainage Strategy in place.
- 5.130 Since the LLFAs previous comments, it is noted that national climate change guidance for flood risk assessments was updated in May 2022, so that a specific river catchment climate change allowance is now applied. There has been no updated information provided for the flood risk modelled in support of the flood risk assessment.
- 5.131 As the updated peak river flow climate change allowance leads to a reduction in the modelled flood risk extents, the LLFA considers the modelled flood risk previously submitted to show a more extreme event, and therefore, a higher level of mitigation is currently provided in the design than is submitted. Should the applicant seek to redesign the mitigation arrangements in the future, then the LLFA would expect new information to support the proposed design, as there could be a change in the mitigation that could impact the level of risk associated to the proposed development and may have additional implications.
- 5.132 As such an updated condition is recommended in relation to the proposed surface water drainage schemes for the outline development, requiring that the new allowances are applied.
- 5.133 In terms of the surface water drainage within the full planning application area i.e. phase 1 and the western relief road, the LLFA will require updated surface water drainage modelling to be provided as part of the planning application prior to determination.
- 5.134 To enable this information to be provided prior to determination, delegated authority is therefore sought to authorise the Assistant Director of Planning to approve subject to there being no substantive comments received from the LLFA relating to surface water drainage within the full planning application area.
- 5.135 The LLFA have also reviewed the additional information provided in the updated application that relates to how the proposed scheme will deliver the nutrient neutrality requirements for this application. The LLFA continues to have no objection subject to an additional condition being attached to any consent, along with their previous conditions, requiring detailed designs for the long-term wetland mitigation strategy to ensure the proposed development does not increase the surface water flood risk either onsite or elsewhere.
- 5.136 With regards to the future management and maintenance of all surface water features and foul infrastructure within the site, including watercourses, these are proposed to be adopted by Anglian Water who will maintain these throughout the lifetime of the development. Management and maintenance will be secured by conditions. All drainage features associated with the bypass will be offered and managed by the Highway Authority.
- 5.137 The LLFA has assessed the future management and maintenance arrangements of the surface water features and considers that the application has a viable proposal for the adoption and maintenance of these for the lifetime of the development in accordance with the NPPF.

- 5.138 Therefore, whilst it is understood there is some local concern regarding flooding events, the LLFA and Anglian Water are satisfied that the proposed surface water drainage and foul drainage would be adequately addressed through the proposed development and the implementation of sustainable drainage systems. In doing so, the proposed development would not increase existing surface water risk elsewhere.
- 5.139 As such subject to conditions and delegated authority to authorise the Assistant Director of Planning to approve subject to there being no substantive comments received from the LLFA relating to surface water drainage within the full planning application area, the proposals are considered to be in accordance with Policy DM4.2 of the SNLP, Policy JCS 1, the LSAAP and National Planning Policy Framework paragraph 167, 169 and 174, by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.
- 5.140 In terms of environmental impacts as identified in the submitted ES, the assessment shows that mitigation measures to ensure future users of the proposed developments will be adequately protected from flooding and that the development will not increase flood risk elsewhere. No potentially significant effects have been identified which require mitigation, both during the construction and operation phase in respect to surface water.
- 5.141 Furthermore, cumulative effects of all surrounding committed schemes as identified in the Environmental Statement, would not result in adverse effects to hydrology, flood risk and water resources.

Minerals safeguarding

- 5.142 Norfolk County Council in its capacity as the Mineral and Waste Planning Authority have commend on the planning application and have raised no objections. No safeguarded mineral resources occur within the areas identified for built development, although some of the areas of open space close to the Water Recycling centre are underlain by safeguarded sand and gravel. Anglian Water as the operator of the Water Recycling Centre have been consulted regarding potential impacts on the existing operation from proposed development and have raised no objections. As such is considered that the proposals are acceptable in this regard.

Other matters

- 5.143 In the interests of completeness, and whilst there is some overlap with the various sections within the allocation, the following section of the assessment seeks to highlight how the scheme complies with the other relevant policies within the SNLP.

Landscape and visual impact

- 5.144 Policy DM4.5 requires all development to respect, conserve and where possible enhance the landscape character of its immediate and wider environment. Policy DM4.9 looks for a high quality of landscape design, implementation, and management as an integral part of new development. Policy DM4.8 promotes the retention and conservation of trees and hedgerows and advises that the Council will promote the retention and conservation of significant trees, woodlands and traditional orchards. Policy DC7 of the LSNP requires development proposals to be sympathetic to Long Stratton's local landscape character, including the landscape which surrounds the settlement.
- 5.145 A landscape and visual impact assessment (LVIA) accompanies the application, which considers the landscape and visual effects resulting from the development and the application Sites.
- 5.146 With regards to landscape character, the northern part of the site is largely within the Landscape Character Area B1 - Tas Tributary Farmland and the southern part is within E2, Great Moulton Plateau Farmland.

- 5.147 The strategy and mitigation seek to reinforce and enhance local landscape patterns. It does not aim to fully screen the development, but rather to develop and enhance the relationships between the settlement and countryside edge. The following mitigation measures are proposed to reduce the overall negative visual effects of the west development :
- extend and reinforce the existing landscape patterns, with more diverse, organic boundaries and planting to the north and west (as per the Tas Tributary Farmland LCA);
 - supplement the large-scale site boundary and off-site planting with characterful, diverse and richly planted landscapes within the Site, designed to express contrasts in character between the new neighbourhoods and streetscapes – at the scale of the residential areas, so that the new development has a soft, relatively ‘green’ appearance in views from the surrounding countryside;
 - enhance green infrastructure connections between Long Stratton and its rural hinterland, providing a variety of circular walks and encouraging people to walk and cycle to local destinations;
 - ensure the special, heritage character and landscape setting of St Michael’s Church is conserved, with improved pedestrian links between Long Stratton and Stratton St Michael;
 - select tree and shrub species which are appropriate for local soils and which reinforce the inherent character of the landscapes which provide the context to Long Stratton;
 - establish robust measures for landscape adoption and management long-term.
- 5.148 Officers are of the opinion that the proposed development will inevitably have an impact upon the landscape character, however the effects will be reduced in the longer term by the proposed mitigation, which will contribute to an overall enhancement of visual character and quality of the landscape, which are assessed further below.
- 5.149 Turning to visual effects and identified viewpoints, these are predicted on the LVIA to have significant adverse visual effects during the construction stages of the development (views 2, 3, 4, 6, 8, 12, 13 15, and 17), which given the scale of this development and the relatively open character of the farmland landscape to the east of Long Stratton and immediately to the west of the A140 (at viewpoint 15) is to be expected. For most of these same viewpoints, significant adverse effects are expected to continue through to the completion but will soften as new tree planting and landscaping becomes more effective over time. After 15 years, the predicted visual effects are generally low or positive, as the new planting matures and screens the development, which is predicted to enhance some of the degraded character of the open farmland to the east of Long Stratton.
- 5.150 To minimise the negative landscape and visual impacts of the proposals, both during construction and post construction, the application proposes a mitigation strategy, which is detailed in a Green Infrastructure and Open Space Strategy and Design Code for the development. A separate Landscape and Ecology Management Plan (LEMP) also provides a schedule of landscape management activities/measures which establishes the principles for ongoing management that secures the long-term objectives of the green infrastructure strategy, to be secured by condition.
- 5.151 These mitigation measures are secured by the detailed design proposals contained in the application and LEMP as well as secured through the conditions of the planning permission and subsequent Reserved Matters approval for the remaining areas. In addition, the Design Code, which is submitted as part of the planning applications, provides detailed guidance for the implementation of the mitigation measures.
- 5.152 Having regard to the above development proposals and to protecting the distinctive characteristics, special qualities and geographical extents of the identified character areas, Officer’s acknowledge that the proposed development will have an impact upon the landscape character, however this will be relatively short term and the effects will be reduced in the longer term by the proposed mitigation, which will contribute to an overall enhancement of visual character and quality of the landscape. Moreover, where adverse effects are anticipated, the mitigation measures proposed will be incorporated into the design of the development to ensure the impacts are reduced over time, particularly as the proposed planting matures.

- 5.153 Consequently, it is considered that on balance, the development would be acceptable with regards to its anticipated impact upon the character and visual effects of the landscape, particularly when noting the mitigation/enhancement measures identified above and that the site already benefits from being allocated in the LSAAP.
- 5.154 In terms of environmental impacts as identified in the submitted ES, the assessment shows that there are predicted to be significant negative landscape effects on some landscape receptors during the construction and immediate post-construction stages of the development, primarily hedgerows and mature hedgerow trees, rural landscape and tracks and long expansive views. These effects are considered temporary and, given the existing open character of the site and proposed bypass. No significant negative landscape or visual effects are predicted to occur following completion of the Long Stratton development. Instead, the mitigation measures identified will ensure that there will be no significant negative effects and that the overall result will be an enhancement of overall landscape and visual character as the new planting matures.
- 5.155 Furthermore, it is considered that, due to physical distance and visual separation between other committed developments as identified in the ES, there will be no cumulative impacts.

Trees and hedgerows

- 5.156 Policy DM 4.8 of the SNLP seeks to promote the retention and conservation of trees. Policy 1 of the JCS emphasises the importance of protecting, maintaining, restoring, and enhancing environmental assets, in addition to promoting the provision of multifunctional green infrastructure. The above policy objectives are reinforced under paragraph 131 of the NPPF.
- 5.157 The application is supported by a Tree Survey and Arboricultural Impact Assessment, which identifies the extent of tree and hedge removal across the site, which is limited to the removal of mostly low-quality trees.
- 5.158 In considering this, the proposals must be assessed in conjunction with the aspirations to deliver a bypass and the approved site allocation, which will necessitate the removal of some trees and hedgerows.
- 5.159 To mitigate against the loss, it is recognised that the retention and improvement of other visually prominent trees and hedgerows is proposed, as well as extensive new tree and hedgerow planting, woodlands and landscape buffers, which in my opinion, will help to retain and enhance the overall landscape character of the site and its boundaries.
- 5.160 As such, whilst it is recognised that trees and hedgerows should be retained where possible, it is not considered possible to retain the trees and sections of hedgerows identified for removal in this instance whilst also delivering the requirements of the development and LSAAP.
- 5.161 The loss of these trees and hedgerows, is therefore on balance considered acceptable when having regard to the weight afforded to the requirements of the site allocation and proposed mitigation measures, which in my opinion outweighs the loss in terms of the benefits of the development in accordance with Policy DM4.8.
- 5.162 The proposed development would therefore be in accordance with Policies DM4.4 and DM4.8 of the SNLP, Policy 1 of the JCS, and accord with the relevant objectives and policies contained within the NPPF and the requirements of LSNP and LSAAP, subject to conditions requiring updated surveys should these become out of date at the time of submission of reserved matters, details of tree protection measures and adherence to the proposed mitigation measures.

Ecology and Protected Species

- 5.163 Policy DM4.4 of the SNLP requires developments to contribute towards the establishment and positive improvement of coherent ecological networks, including biodiversity enhancements and multi-functional Green Infrastructure. Policy 1 of the JCS, amongst other matters, requires developments to improve the resilience of ecosystems to environmental change, as well as ensuring that developments are assessed in accordance with national policy and legislation. Policy GI19 of the LSNP requires development proposals which impact upon identified biodiversity assets to contribute to, rather than detract from, their biodiversity value as well as considering wildlife connectivity to and from these sites. The policy also expects developments to deliver net gains in biodiversity by creating or enhancing habitats. Furthermore, Policy GI17 requires the delivery of Green Infrastructure in Long Stratton where under Local Plan provisions and Policy GI18 expects development to provide robust arrangements for the future maintenance.
- 5.164 This application is supported by an Ecological Impact Assessment, which includes a suite of ecological surveys describing the habitats, protected species, designated sites, and other ecological matters associated with the site.
- 5.165 The application is also supported by a Landscape and Ecological Management Plan (LEMP) setting out the appropriate management options for achieving ecological and biodiversity enhancements such as bat boxes, bird boxes, and hedgehog gap, as well as the mechanisms by which the long-term implementation of the plan will be secured and delivered.
- 5.166 The submitted Design Code document gives greater detail addressing some of the previous comments made by the County Ecologist, in terms of public open space, green infrastructure, hedgerow planting, green landscaping/screening, and permanent water bodies.
- 5.167 The overall ecological aim of the proposed development is to ensure no net loss of biodiversity, largely by working to achieve a net positive ecological impact on-site. Requirements for ecological enhancement measures which would achieve a net positive impact are set out in the submitted Environmental Statement Biodiversity chapter, which are proposed to be further detailed in a Construction Environmental Management Plan (CEMP), to be secured by planning condition. A condition is also recommended requiring that each Reserved Matters application is accompanied by a detailed Biodiversity Method Statement and a Biodiversity Net Gain Audit (post completion) to demonstrate the proposals have met their commitment (as set out in Chapter 7 of the Environmental Statement) to achieving no net loss of hedges and trees, demonstrate no net loss, and demonstrate Biodiversity Net Gain.
- 5.168 Further conditions are recommended relating to lighting and showing where dark corridors will be provided through the landscape for bats, and a condition recommended that updated ecology surveys are submitted should they become out of date at the time of the submission of reserved matters for each phase of development.
- 5.169 In terms of construction activities and the potential effects on ecology, all necessary mitigation is recommended to be secured by condition requiring a Construction Environmental Management Plan (CEMP) based on the recommendations of the LEMP and detailed assessment contained in the submitted Environmental Statement.
- 5.170 Subject to conditions securing mitigation measures to minimise the risk of harm to protected species, including details of enhancements for biodiversity within the development and existing boundaries, the proposals are considered acceptable in this regard.
- 5.171 As part of the proposed mitigation package, a District Level Licensing scheme has also been agreed with Natural England to compensate for on-site impacts to great crested newts. The majority of the compensation for great crested newts will be provided off-site, along with the retention of some on-site ponds and on-site Green Infrastructure. This will be secured by developer contributions to fund targeted offsite habitat improvements carried out by Natural England.

5.172 With regards to non-statutory designated nature conservation sites, the following have been identified within 2km of the development:

- Tyrrell's Wood and New Plantation CWS, approximately 0.57km south-east of the site. The CWS comprises two woodlands which border the Pulham Market Big Wood SSSI.
- Wood Green CWS, approximately 0.43km east of the site. The CWS is noted for its ponds and its mosaic of neutral grassland, scrub and woodland.
- Hill Farm Woodland CWS, approximately 0.77km west of the site. The CWS is a semi-natural woodland with a series of large oak *Quercus robur* pollards, estimated to be up to 300 years old.
- Pecks Plantation CWS, approximately 1.2km north-west of the site. The CWS is noted for its acid heath, woodland and scrub. At the time of the last survey in 1995, the site housed an active bat hibernaculum.
- Fritton Grange Meadows CWS, approximately 2km north-east of the site. The CWS is noted for its tall grassland and tall fen vegetation, plus its ponds and network of dykes.

5.173 To limit the likelihood of nearby designated nature conservation sites experiencing potentially harmful increases in recreational effects because of the increased residential population, the application proposes extensive areas of open space and informal Green Infrastructure, including circular walks, directional signage and connections with pre-existing GI (such as footpaths etc).

The principle green infrastructure features proposed to mitigate these impacts are:

- open space within development areas – including village greens, play areas and commons;
- strategic green infrastructure and landscape buffers;
- major green corridors that connect the existing village of Long Stratton to the countryside via the new development areas, including at Star Lane and south of Hall Lane;
- enhanced off-road footpath connections to Haynton's Lane (to the west) and Boudica's Way (to the east) with safe crossing points and connections
- quiet green lane status for Parker's Lane, Star Lane and Edge's Lane, which will be closed to through traffic and will provide safe cycle routes to Mill Lane and the rural roads beyond;
- a new linear park along the east fringes of the development, separating residential areas from the bypass, which will incorporate a cycleway and a network of circular walks to connect the neighbourhoods and green spaces an extensive open space along the Picton Stream valley, which provides recreational links between local roads (Swan Lane and Brand's Lane) and the wider network of footpaths to the west of Long Stratton;
- Planting of native and locally suitable trees and hedgerows on the developed site, including new woodland and copses;
- Individual, scattered and small groups of trees within grassland;
- New areas of amenity and meadow grassland managed for the benefit of native grasses and flowers;
- Swales and SuDS incorporating wetlands and new ponds;
- Skylark mitigate package comprising nesting plots, monitoring surveys and developer contribution secured by the S106;
- provision of at least 1km of off site hedging to mitigate the loss of habitat for the yellowhammer secured by S106
- Bird boxes, bat roost boxes and porous terrestrial friendly fences.

- 5.174 Monitoring is also proposed to document any change in habitat condition as a result of increased visitor use from the new development. Monitoring requirements are outlined in the submitted LEMP which require habitats to be monitored both pre construction and throughout the development to inform the future management of onsite Green Infrastructure and the delivery of any additional mitigation if deemed necessary to achieve the aims of the LEMP. A condition is recommended requiring the LEMP to be updated for each phase or sub-phase of the development to identify any necessary remedial measures/alterations to the management regime or mitigation to improve the biodiversity value of the site, including additional planting and management of public areas, ancillary measures such as bird and bat boxes, lighting of sensitive areas and a timetable for implementation and proposed wetland areas required to mitigate Nutrient Neutrality.
- 5.175 Having regard to the above and the Council's Ecologist's assessment of the potential impacts on the non-statutory designated nature conservation sites, it is considered that the development will not have significant adverse impacts on statutorily protected nature conservation sites or natural assets, subject to the appropriate mitigation set out above and conditions.
- 5.176 In terms of international designated sites, the nearest sites are between 16 and 17km from the development, which are the River Wensum SAC, The Broads SAC, Broadland SPA, Redgrave & South Lopham Fens Ramsar and Waveney & Little Ouse Valley Fens SAC.
- 5.177 In the context of the Habitats Regulations it is evident that, as competent authority, SNC will have to adopt a Habitats Regulations Assessment (HRA) to set out how the impacts on international designated sites in the surrounding region are mitigated, and this will need to be finalised with input from Natural England prior to any decision.
- 5.178 The necessary mitigation, as well as those set out in respect of biodiversity above, will also include the following:
- With regard to combined recreational impacts, the site is located within the Zones of Influence (ZOI) for the Habitat Sites and as such mitigation measures are required to adequately mitigate potential in combination recreational impacts on the Brecks, Broads, East Coast and Norfolk Valley Fens Habitat Sites. In accordance with the Norfolk Green Infrastructure and Recreational impact Avoidance Mitigation Strategy (RAMS), dated March 2021, an index linked RAMS contribution will be secured through the S.106 to mitigate against any adverse effects of the proposed development on the integrity of the Habitat Sites.
- 5.179 Members should note that the Landscape Masterplan includes some areas outside of the red line boundary, but not some areas within the red line. As such it is recommended that the Landscape Masterplan is amended prior to the determination of this application to include all areas within the red-line and exclude those outside.
- 5.180 With regard to nutrient neutrality, this site is located within the catchment area of one or more of these sites as identified by Natural England and involves the creation of additional overnight accommodation and therefore a net increase in population in the catchment. As such, The Broads Special Area of Conservation (SAC) and Broadland Ramsar are at risk of an increase in phosphorus or nitrogen supply caused by the development, which will likely give rise to a significant effect on the conservation objectives of the protected habitats.
- 5.181 On this basis it will be necessary to mitigate impacts in respect of this issue. In response the applicant has undertaken a nutrient budget calculation to understand what amounts of phosphates and nitrates need to be mitigated for as a consequence of the proposed development.

- 5.182 These figures have been reached using the Natural England Broads SAC and Broadlands Ramsar Site Nutrient Budget Calculator but adopting a Norfolk-specific occupancy rate of 1.89 persons per dwelling which has been adopted by the Local Planning Authority and agreed with Natural England. This is opposed to using the Norfolk Nutrient Budget calculator in its entirety, based on the applicant's preference to take a more cautious approach to calculating the nutrient budget for the site.
- 5.183 Having established what needs to be mitigated the application has put forward a strategy based upon both short term and longer term elements.
- 5.184 The short-term mitigation strategy for the proposed development includes the use of a three stage SuDS treatment train and temporary fallowing of part of the site i.e. taking agricultural land out of production, to achieve nutrient neutrality on site up to 857 dwellings whilst a long-term mitigation strategy is developed.
- 5.185 The longer term strategy comprises of three possible solutions for the development, including creation of an offsite wetland, Anglian Water upgrades and proposals under the Levelling Up and Regeneration Bill which would result in the entire 1,875 dwelling development achieving nutrient neutrality.
- 5.186 In relation to Natural England advice, mitigation should be in place so as to avoid either permanent, or temporary increases in phosphate loads to the designated site and must be effective for the duration of the effect and typically taken as in perpetuity.
- 5.187 Both the short-term and long-term solutions set out are proposed to achieve nutrient neutrality. However, it should be noted that the temporary fallowing of part of the site is an interim solution whilst larger, long-term strategic solutions are established.
- 5.188 The three potential solutions are considered below in more detail to achieve a long-term strategy that could allow the entire development to achieve neutrality.
- 5.189 These include an offsite wetland of additional land in the landowner's control which has been screened to demonstrate there is available land within the same catchment to offset the proposed development's remaining nutrient budget. The second solution follows ongoing discussions between the applicant and Anglian Water to upgrade the Long Stratton Waste Recycling Centre (WRC) to remove nutrients from the catchment via catchment offsetting or upgrades to the WRC. The third solution is through the amendments to the Levelling Up and Regeneration Bill (LURB) which will place a new statutory duty on water and sewerage companies in England to upgrade Wastewater Treatment Works by 2030 in 'nutrient neutrality' areas. If the proposed amendment to the LURB is implemented the applicant's assessment indicates that the reduction in foul drainage impact from the proposed development at Long Stratton will result in the development achieving neutrality in combination with the implementation of the proposed SuDS strategy across the site as detailed above. Should the last two options not achieve neutrality for the site in its entirety, the remaining budget is proposed to be offset by the offsite wetland in option 1.
- 5.190 Having regard to the above, further discussions with Natural England are required to consider the proposed mitigation strategy and the appropriateness of the above as to date no agreement has been reached with them.
- 5.191 Members should also note that at the time of writing, further updated information has been submitted by the applicant in respect to nutrient neutrality including a shadow Habitats Regulations Assessment, which is being considered by Natural England and the Council as Competent Authority. However at present no agreement has been reached through an Appropriate Assessment to be able to conclude that the proposals would result in achieving nutrient neutrality. The Appropriate Assessment will need to assess the likely significant effects of the proposal on the integrity of the site and its conservation objectives, and consider ways to avoid or reduce (mitigate) any potential for an 'adverse effect on the integrity of the site'.

- 5.192 On this basis the recommendation is to delegate authority to the Assistant Director of Planning to approve the application subject to receiving no substantive comments from Natural England and the Council as Competent Authority being satisfied through an Appropriate Assessment that the short term and long term mitigation strategy would result in the entire 1,875 dwelling development achieving nutrient neutrality.
- 5.193 In terms of environmental impacts as identified in the submitted ES, the predicted impacts to ecological receptors resulting from the proposed development have been assessed. Without mitigation, negative effects would be predicted.
- 5.194 Residual post-mitigation significant effects are predicted for some of the grass verges in the east of the site. A significant effect is also predicted for hedgerows and trees, as some removal will inevitably be necessary to accommodate the proposed development. However, in this case this effect would be temporary and reversible, as long-term compensation would create at least an equivalent amount of hedgerow and tree habitat at the site.
- 5.195 A short-term significant effect is also predicted for the local/parish yellowhammer population due to land-take and skylarks, but once the compensatory and mitigation measures are in place, to be secured through the S106, this effect is expected to become not significant. All other significant pre-mitigation effects will be avoidable by providing the mitigation measures set out by conditions and the S106.
- 5.196 Negative effects to great crested newts and roosting bats will be addressed through EPS licensing and licences have been obtained where necessary, a copy of which will be required by condition.
- 5.197 The developed site has scope for extensive ecological enhancement through incorporation of Green Infrastructure, to be installed and managed for the benefit of a range of valued ecological receptors.

Impact on historic environment

- 5.198 Policy DM4.10 of the SNLP sets out that proposals must have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place. It goes on to cite that considerable importance and weight must be given to the desirability of preserving listed buildings, their settings and the character and appearance of conservation areas. Policy DC9 of the LSNP and the AAP reaffirms these policy requirements with specific regard to strengthening and enhancing Long Stratton's historic core.
- 5.199 The Council also has statutory duties, under s.66(1) and s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving the significance of listed buildings and the desirability of preserving or enhancing the character or appearance of conservation areas. Paragraph 200 of the NPPF makes it clear that any harm to, or loss of, significance of a designated heritage asset should require "clear and convincing justification". Furthermore, Paragraph 202 of the NPPF requires that where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal.
- 5.200 In terms of heritage impacts, there are a number of assets affected around the site, including the Long Stratton Conservation Area, a number of Grade I and Grade II* listed buildings (mostly churches) and many Grade II listed buildings. There are also several Buildings of Townscape Significance identified within the Long Stratton Conservation Area which are potentially affected by the proposals.
- 5.201 The application is accompanied by a Heritage Statement, which goes through the significance of each asset in turn, and the impact of the development proposals, which are to varying degrees. The submitted Environmental Statement goes into more detail and attributes sensitivity and potential impact to each asset.

- 5.202 The Councils Senior Heritage and Design Officer has assessed the proposals and has identified varying degrees of harm, but acknowledges that the level of harm is difficult to identify at this outline stage, as the impact is to a large extent determined by the final proposals.
- 5.203 Along Norwich Road to the north there are a number of heritage assets affected ranging from smaller C17/C18 cottages, from single storey with dormers to two storeys, to the three storey Georgian farmhouse The Cedars. The Cedars is more of an exception, as a large Georgian farmhouse, with the C17/C18 smaller cottages being most characteristic of historic housing in the area.
- 5.204 Grade II listed Orchardleigh along Norwich Road will also lose its connection at the rear to open countryside (the cottages to the north less so as there are outbuildings to the rear), and this will need to be taken as an element of moderate harm, although of benefit, will be the loss of through traffic to the road to the front. Similarly listed houses on the west side, Pepyrs, Low Cottage, Walnut Tree Cottage and The Red House, will all lose their connection to the open countryside at the rear. 1 & 2 Church Lane and Well Meadow will be similarly affected by the proximity of the roundabout.
- 5.205 There will also be a degree of impact on the grade II listed heritage assets along Norwich and Ipswich Roads which are still viewed in a dispersed and rural context, which to some extent will be lost either through development at the rear or to the front. This will again result in some degree of harm, even though the removal of through traffic from the front will result in some benefit.
- 5.206 The listed windmill is a local landmark and is a positive aspect of the proposals that it is being used as a landmark in terms of landscaping and the footpath network.
- 5.207 The two Stratton Churches of St Michaels and St Marys (both grade I) are both important heritage assets of high significance directly affected by the proposals. The bypass and general layout of the area close to St Michaels will inevitably have a considerable impact on how the churchyard is experienced and also its connection to the Old Parsonage.
- 5.208 The heritage statement identifies a moderate/large adverse impact on both St Michaels church and the Old Rectory, which have close historic associations, as a result of the imposition of the new road and the loss of connection across open fields with the Old Parsonage. This will result in both rural and visual changes. There will also be a degree of harm to the setting of the Old Parsonage resulting from the development, although land immediately to the south west and east of the Parsonage has already been developed.
- 5.209 To the east of the village, including the various listed buildings near to St Michaels, the loss of open and flat landscape will have some impact together with traffic noise. The proposed landscaping alongside the bypass and the rural edge treatment to the housing facing towards the countryside is intended to help mitigate intrusion of the bypass and its impact in terms of noise and to some extent. This to some extent is considered an improvement to the existing setting of the listed buildings which are currently viewed in the context of the earlier estate expansion of the village.
- 5.210 The east side of the settlement is more closely connected to the village centre which is a conservation area and the extent of growth will change how the town centre is used particularly in terms of different types of traffic i.e. residents accessing services rather than through traffic. The bypass will remove to a large extent the disturbance and harm caused to the setting of the listed buildings by through traffic, including lorries, and can therefore be considered to have a beneficial impact on the character and appearance of the conservation area and listed buildings within it.

- 5.211 With the exception of St Marys and its immediate setting to the East, the listed buildings within the village centre do not have significant intervisibility with the open countryside to the east. There are some glimpsed views through to landscaping in the gaps between the former Victorian villas immediately south of Stratton Motor Company garage. There is also a good view along Flowerpot Lane looking east with a pair of Victorian semis terminating the view and the wooded copse behind visible as a backdrop, with the grassed field visible between the gaps.
- 5.212 The Design Code shows a lower density and green space for this small pocket of development, and with appropriate landscaping it is considered that this can be mitigated by careful arrangement of housing and at the reserved matters stage. Furthermore, the wooded copse which has tall trees and sits high on the ground, will continue to provide a backdrop in views from Flowerpot Lane, as well as the setting of the church. It is recommended that a condition is included requiring that the developers complete a design code compliance statement showing how the lower density areas and green spaces are applied at the reserved matters stage.
- 5.213 In considering the points above and comments received, the local Planning Authority consider that on balance the Heritage Statement is fit for purpose, and that the scheme does have appropriate regard to the nearby heritage assets, and their setting, when considering the proposed mitigation highlighted and that detailed reserved matters application could add sufficient detail in respect of further mitigation of the impacts the proposals are acceptable.
- 5.214 Historic England have also commented on the proposals, concluding that they do not wish to offer any advice on the revised proposals and that the views of the Council's specialist conservation and archaeological advisors should be sought.
- 5.215 In terms of the harms identified and given the sensitivity of the existing environment, the heritage assets within the eastern 'ancient countryside' area, are the most adversely affected. The most significant effects are those to the Grade I Listed Church of St Michael, which despite mitigation, will likely result in a moderate/large adverse effect due to the rural and visual changes to its setting resulting from the noise of the bypass and the consequential landform and landscape changes required to mitigate this.
- 5.216 Having regard to the above, both Policy DM4.10 and the NPPF makes it clear that the harm should be weighed against the public benefits of the scheme (para 202). Consideration must also be given to JCS 2 and DM 4.10 of the local Plan and section 66 of the Planning (Listed Building and Conservation Areas) Act 1990.
- 5.217 As outlined above it is considered that some harm, including less than substantial harm to the Church of St Michael, and a similar level of harm (i.e. at the higher end of 'less than substantial'), is also attributed to the impact on Nos. 1 & 2 Church Lane and Rhees Green Cottage, which are Grade II listed would occur as a result of the development.
- 5.218 It is therefore necessary to establish if there are public benefits that outweigh the harm. In this case, the benefits are mainly associated with the construction of the bypass as part of the east application ref 2018/0111 which is intrinsically linked to this application (2018/0112) and requires the bypass to be completed prior to the occupation of 250th dwelling across the east and west. This would result in substantial beneficial effects for those heritage assets that within or are in close proximity to the existing A140, including the Long Stratton Conservation Area which is currently dominated by heavy trunk road traffic.
- 5.219 The removal of the trunk road traffic from the centre of the village offers scope for substantial public realm improvements that will significantly enhance the character and appearance of the Conservation Area and the setting of numerous listed buildings, not least of which include the Grade I Listed St Mary's Church and the Grade II* Listed building on The Street. The Neighbourhood Plan includes policies which specifically set out the expectations of the development of the application site, notably Policy TC13 which seeks to re-establish The Street as the heart of the town whilst TC14 seeks the creation of a new market place.

- 5.220 The removal of heavy lorries and other traffic is a key objective of the vision set out in the Long Stratton Area Action Plan and feeds directly into the 'Town Centre Objective' of revitalising the town centre by enhancing the historic streetscape of the conservation area and creating a safer and more attractive environment. These associated improvements in turn provide an opportunity for works to help create attractive public spaces and retain or enhance facilities to encourage the revitalisation of Long Stratton's historic core, albeit it is noted that the development proposals alone do not secure a scheme for improvement works to the A140 or Town Centre
- 5.221 Furthermore, the prospects for the long-term conservation and viability of these heritage assets is greatly enhanced by the proposed development, which is reinforced in the Long Stratton Conservation Area Character Appraisal, which states it is 'imperative that the village is freed from the heavy traffic which pounds through it constantly'. Other benefits relate to the significant economic/employment opportunities that would arise.
- 5.222 In summary and when having regard to all of the public benefits, it is considered that on balance these outweigh the harm caused to the significance of the heritage assets in accordance with paragraph 196 of the NPPF. Furthermore, it is considered that due regard has been had to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess (S66 of the P(LB&CA) Act 1990). The proposals are therefore considered to accord with Policy DM4.10 of the SNLP, Policy DC9 of the LSNP and the LSAAP.
- 5.223 In relation to archaeology, geophysical survey work and desk-based assessments have been carried out during the course of the application.
- 5.224 The Historic Environment Service have assessed the proposals and have confirmed that they are happy that the remainder of the archaeological mitigation can be achieved subject to a programme of archaeological mitigatory work to be submitted to and approved prior to the commencement of development. As such and subject to appropriately worded planning conditions recommended by the Historic Environment Service, the proposals are considered acceptable.
- 5.225 In terms of environmental impacts as identified in the submitted ES, the assessment concludes that there would be adverse effects or harm to the heritage significance of most heritage assets outside the Long Stratton Conservation Area to the north and east, largely due to the new bypass and the development on the east side of the village. This would be during the construction period and before the mitigation measures are in place. Those heritage assets on the west side of the village and within the village would be much less affected by the development. Furthermore, the removal of heavy trunk road traffic from the village centre will have substantial benefits for the Long Stratton Conservation Area and the listed buildings.
- 5.226 Mitigation measures are proposed to reduce the negative impact on the heritage assets to the east and north of Long Stratton. The listed buildings in Stratton St Michael are the most affected by the development and as a result significant landscaping and landform changes are proposed around the bypass route to provide screening of both the noise and visual impact of the road and the residential development. This landscaping, planting, bunding and cutting continues along the entire bypass route mitigating the impact on the other properties also negatively affected to the east of Long Stratton and the farmhouses to the south.
- 5.227 Once the landscaping matures, it is predicted that there will be an overall beneficial impact on the cultural heritage of the area. This is because a large number of listed buildings will have benefitted substantially from the removal of the traffic from their immediate vicinity along the existing A140, including the Grade I listed Church of St Mary in Long Stratton. The mature landscaping will also mitigate most of the negative impacts of the development with only the Church of St Michael and Nos. 1 & 2 Church Lane in Stratton St Michael, and Rhees Green Cottage, continuing to suffer ongoing negative effects from the development. Overall, the development will be largely beneficial for the cultural heritage of the area as set out above.

- 5.228 Regarding impacts of the proposed development on archaeology and the proposed mitigation measures, these will not result in a significant adverse impact.

Residential amenity

- 5.229 Policy DM3.13 Residential amenity directs that development should not be approved if it would have a significant adverse impact on nearby residents' amenities or the amenities of new occupiers.
- 5.230 In respect to the detailed phase 1 layout, it is considered that the separation distances and layout of the site is adequate to safeguard amenity levels of future residents and that the proposals will not result in a significant adverse impact on resident's amenities in terms of overlooking, overshadowing and privacy and is therefore acceptable.
- 5.231 With regards to the remaining phases of development which are in outline form, it is not possible to undertake a detailed assessment of these phases in respect of neighbour amenity with regard to light, outlook, privacy etc. However, it is evident from the submitted information that any reserved matters application could design a layout and house types which would prevent significant harm being caused in respect of the residential amenity.
- 5.232 With regards to the bypass (application ref 2018/0111) and the proposed northern roundabout, which also forms part of this application, it is acknowledged that there will be a degree of impact on residential amenity, particularly to the nearest dwellings.
- 5.233 Presently traffic along the existing A140 generates high noise levels at properties to both the east and west sides of the road. The proposed bypass scheme would significantly reduce the traffic volume along the A140 to result in a reduction in traffic noise at some properties, immediately adjacent to the A140 road. To further reduce noise impacts, mitigation options have been proposed as part of the bypass scheme which include landscaping to provide noise barriers in the form of bunds along the bypass and reducing the speed of traffic along the section of bypass from Edge's Lane roundabout to the northern roundabout (which also forms part of this application). Additional noise mitigation will also be secured as part of future reserved matters applications in respect to the detailed design and layout of housing to further reduce noise impacts as well as construction management prior to the commencement of development.
- 5.234 In terms of the location of the mixed-use employment area, this is sufficiently separate from housing that an acceptable relationship can be maintained between the two uses, which will be subject to further consideration at the reserved matters stage.
- 5.235 The Council's Environmental Protection Team have been consulted on the application and have raised no objections in respect to the proposed bypass and the northern roundabout with regards to the amenity of existing neighbouring properties or future occupants, subject to recommended conditions.
- 5.236 Turning to other associated noise impacts, it is noted that Banham Poultry Farm, located on Picton Lane, have objected to the proposals regarding noise (and odour) from its farm operations and how these could impact on the development and their operations.
- 5.237 National planning and noise policy requires that the impact is reduced below a significant adverse impact and to a minimum by mitigation and that also does not place restrictions on the Farm's operation that are unreasonable.
- 5.238 Paragraph 187 of NPPF puts in place protections for existing businesses known as the "Agent of Change" principle: *"Planning policies and decisions should ensure that new development can be integrated effectively with existing business and community facilities (such as places of worship, pubs, music venues and sports clubs)". Existing businesses should not have "unreasonable restrictions placed on them as a result of development permitted after they were established"*.

Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

- 5.239 In relation to paragraph 187 of the NPPF and "Agent of Change", Planning Practice Guidance at Paragraph 009 of the noise section says "*Development proposed in the vicinity of existing businesses, community facilities or other activities may need to put suitable mitigation measures in place to avoid those activities having a significant adverse effect on residents or users of the proposed scheme.*
- 5.240 *In these circumstances the applicant (or 'agent of change') will need to clearly identify the effects of existing businesses that may cause a nuisance (including noise, but also dust, odours, vibration and other sources of pollution) and the likelihood that they could have a significant adverse effect on new residents/users. In doing so, the agent of change will need to take into account not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made.*
- 5.241 *The agent of change will also need to define clearly the mitigation being proposed to address any potential significant adverse effects that are identified. Adopting this approach may not prevent all complaints from the new residents/users about noise or other effects, but can help to achieve a satisfactory living or working environment, and help to mitigate the risk of a statutory nuisance being found if the new development is used as designed (for example, keeping windows closed and using alternative ventilation systems when the noise or other effects are occurring).*
- 5.242 *It can be helpful for developers to provide information to prospective purchasers or occupants about mitigation measures that have been put in place, to raise awareness and reduce the risk of post-purchase/occupancy complaints"*
- 5.243 With this in mind a noise assessment has been completed at Banham Poultry to consider the noise impact and to review what mitigation measures could form part of a solution to the issues identified in accordance with "Agent of Change" principle, as required by paragraph 187 of the NPPF.
- 5.244 Supplementary surveys have also been undertaken to establish the ambient conditions at the application site and to establish sources of noise, beside those created at Banham Poultry. These showed that the background sound levels reflect the area as a semi-rural community influenced by road traffic (A140). Further detailed surveys identify sound sources on and around the farm, and how these will potentially impact on the application site ranging from minor adverse to negligible impact. The detail of these surveys is set out in the submitted Environmental Statement and noise assessment, including suggested mitigation measures.
- 5.245 To address these impacts, a range of mitigation measures have been identified, such as bunding around the east and north boundaries of the farm (within the application site), and specific measures on new housing, such as re-orientation of the housing, closed windows and alternative methods of ventilation, single aspect dwellings.
- 5.246 The submitted noise impact assessment demonstrates that these measures can be carried out on site and as such a condition is recommended requiring that no development takes place on the west application site until such time that a comprehensive noise assessment to determine the level of noise both internally and externally has been completed in accordance with a scheme to be first agreed in writing by the Local Planning Authority. If the condition determines that mitigation is required, a further condition is recommended requiring details of the noise mitigation measures to be submitted and agreed in writing by the Local planning Authority, including any necessary amendments to the masterplan, to mitigate to the required noise levels.

- 5.247 Discussions have also taken place with the developer and Banham Poultry which have identified a number of options at the farm site, such as the provision of additional silo's by the developer and restricting some of the operational hours for mucking out and hours to test the emergency generator. Whilst these are outside of the scope of this planning application, it is recommended that these are further explored with Banham Poultry under the 'Agent of Change' principle of the NPPF.
- 5.248 In terms of odour, assessed under Policy DM3.14 of the SNLP, an Odour Assessment has been submitted with this application setting out the potential impacts of odour from the farm and possible mitigation measures. It should be noted that odour control relating to the activities at Banham Poultry, is regulated by the Environment Agency under an Environmental Permit. Further guidance is also set out in the Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Odour for Planning'.
- 5.249 The submitted odour assessment showed that the predicted impacts of odour on the proposed residential use from the farm site, as built, would be negligible to moderate, which is regarded as significant based on the above IAQM guidance. However, it should be noted that based on the approved planning permission for the poultry site in 2006 and the Environmental Permit for the facility, impacts would be considered not significant in accordance with IAQM guidance.
- 5.250 As such and given the discrepancy between the assessments, in terms of the current as built impacts and those approved as part of the previous planning consent and Environmental Permit for the facility, it is recommended that agreement is sought between Norfolk Homes and Banham Poultry to modify the sheds to ensure appropriate emission dispersion in accordance with the Environmental Permit regulated by the Environment Agency. If this is not possible, the masterplan will need to be adjusted prior to the commencement of any development of the west application site, to ensure that the impacts are acceptable in accordance with IAQM guidance. A condition is therefore recommended requiring that the odour concentrations as a result of emissions from the Farm are below the relevant amount at all sensitive locations as identified in a comprehensive Odour Assessment to be agreed in writing by the Local Planning Authority prior to commencement of development. If the condition determines that alteration to the masterplan or remedial activities are required as a result of the odour assessment, details of the remediation scheme will need to be submitted and agreed prior to commencement of any development on the west application site.
- 5.251 On this basis the recommendation is to delegate authority to the Assistant Director of Planning to approve the application subject to the Council being satisfied that all matters in relation to both noise and odour associated with Banham Poultry can be satisfactorily resolved by appropriately worded conditions as suggested above.
- 5.252 Subject to the above it is considered that the impacts from odour can be adequately addressed by condition in accordance with DM3.14 of the SNLP and IAQM Guidance.
- 5.253 In terms of environmental impacts as identified in the submitted Environmental Statement, the assessment shows that the proposed development will introduce new sources of light into a relatively dark area of low district brightness although there are existing sources of obtrusive light from the surrounding roads and land uses.
- 5.254 Where lighting is proposed this will be designed in accordance with the mitigation measures identified in the ES and will include the designing the external lighting so the amount of obtrusive light will be reduced as far as possible.
- 5.255 During construction, measures to mitigate significant effects from the artificial light will be secured through pre-construction planning conditions as noted in this assessment to prepare a Construction Environment Management Plan (CEMP). With these mitigation measures in place, residual effects from artificial lighting during construction have been assessed as Minor Adverse.

- 5.256 During operation, measures to mitigate significant effects from artificial light are to be secured through conditions.
- 5.257 With regards to air quality, there are potential construction impacts from dust emissions as a result of earthworks and construction activities. It is considered that the use of good practice control measures as part of the recommended CEMP would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.
- 5.258 Potential impacts during the operational phase of the proposed development may occur due to road traffic emissions, as well as introduce a new emission source in the form of the western relief road. Modelling has been undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the local highway network which indicated that predicted air quality impacts as a result of traffic generated by the development were not significant at any sensitive locations.
- 5.259 In terms of noise, the proposed bypass scheme would significantly reduce the traffic volume along the A140. This is a moderate beneficial effect of the bypass scheme. As noted above and as a result of the bypass and western relief road schemes, a number of properties will experience an increase in noise level which will result in minor to major adverse effects to isolated properties. Mitigation has been developed to minimise the effects of the scheme and will be secured by means of conditions of planning permissions.
- 5.260 Noise from Banham Poultry, as identified above, has been assessed and demonstrates that this may lead to there being significant adverse effects from the business on the new residents and users. Appropriate conditions are recommended to ensure sufficient mitigation approaches are adopted to reduce the impact to a negligible to minor adverse effect.

Housing mix and affordable housing

- 5.261 Policy DM3.1 of the SNLP and Policy 4 of the JCS requires all housing proposals to help contribute towards the delivery of a range of house types and sizes to meet the requirements of different households. Policy SC1 of the LSNP states housing proposals will be supported where they incorporate a significant proportion of two and three bedroom dwellings. Appropriate regard shall also be had to meeting the needs of entry level purchasers on low and medium incomes, and older people through accessible, adaptable general needs housing.
- 5.262 Policy SC3 of the LSNP states that the size and tenure of affordable homes should be specifically tailored to contribute towards Long Stratton's affordable housing needs. It also goes on to say that a meaningful proportion will be prioritised for those residents with a close connection to Long Stratton and that applicants will be expected to refer to the Long Stratton Housing Needs Assessment.
- 5.263 With regards to the mix of affordable housing, the Council's Housing Enabling Team has assessed the proposals and following discussions with the applicant, has agreed a preferred mix of affordable homes across the site based on 60% Affordable/Social Rented Housing and 40% Intermediate Housing, which includes discount market dwellings, shared ownership and shared equity dwellings, first homes or rent to buy (or as otherwise agreed by the Council in writing).
- 5.264 In terms of the precise mix by type and tenure, this will be agreed at Reserved Matters stage on a phase by phase basis. Each phase will require an Affordable Housing Scheme, which must be approved by the Council. The Council's Housing Enabling Team will seek to ensure that the mix type and precise tenure (within the specified 60/40 split) meets identified housing need.

- 5.265 Regarding the full element of the planning application for Phase 1, comprising a total of 213 dwellings, applying the 14.13 percentage (discussed below), produces an affordable housing requirement of 30 (18 for rent and 12 affordable ownership). The mix of affordable homes proposed comprises 1 and 2 bed flats and 2 and 3 bedroom houses. The Housing Enabling Team have assessed the proposals and raised no objections, but would like to see more one bedroom flats proposed for rent in subsequent phases of development, to be secured through the Affordable Housing Scheme to be submitted with each phase of development. A proportion of two and three bedroom dwellings is also proposed as required by Policy SC1 of the LSNP. On this basis it is considered that the mix and types of housing proposed is acceptable and accords with Policy 4 of the JCS, Strategic Housing Market Assessment and LSNP.
- 5.266 Turning to the number of affordable homes proposed, Policy 4 of the JCS requires the development to deliver 33% of the overall number of homes as affordable housing, which reduces to 28% when applying the more up to date SHMA. The policy goes on to state that the proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions.
- 5.267 Having regard to this, the applicants have submitted a viability assessment, which sets out the values generated by the development against the development costs to determine the overall percentage of affordable housing being offered.
- 5.268 In order to validate the assessment, the Council instructed an independent viability consultant CP Viability to review the findings of the applicant's viability assessment in April 2021. Further to our initial viability review and subsequent discussions, the applicant submitted a final updated appraisal dated 5th December 2022 which the Council reviewed in the report from CP Viability dated 16 January 2023.
- 5.269 The report from CP Viability has been carried out in accordance with the national Planning Practice Guidance and has looked at comparable property prices within the area and in specific detail at the build costs of the project as well as other multiple inputs.
- 5.270 The applicant's initial appraisal (which itself was updated from an earlier version) concluded that the scheme was able to deliver 10% onsite affordable housing. The Council's own assessment was that the scheme could deliver 33% affordable housing. It should be noted that a key driver for the difference between the applicant's conclusion and that reached by the Council was due to how land value was assessed within the appraisal.
- 5.271 The applicant's appraisal was subsequently updated following discussions with the Council, which concluded that 15% onsite affordable dwellings could be delivered, in addition to a contribution towards the £4,500,000, an open space contribution and a CIL payment.
- 5.272 The Council provided a response to these offers in a letter from the Council's viability advisor dated 4th March 2022, to conclude that we considered the scheme could provide a minimum of 21.65% onsite affordable housing when taking into account adjustments in the land value (deemed necessary following receipt of further information / evidence from the applicant). On this basis, the Council was not able to agree to the suggested offer of 15% onsite affordable housing at the time.
- 5.273 A further updated viability appraisal was submitted by the applicant on the 5th December 2022 (plus additional supporting evidence from Savills on 11th January 2023) which included updated costs and increased planning costs for public open space and off-site highway works relating to Long Stratton town centre. This resulted in an updated offer of 11% affordable housing.
- 5.274 Following further discussions with the applicants and their advisors, the Council has reviewed the findings of the applicants updated viability assessment in the report from CP Viability dated 16 January 2023 to conclude that the development is able to deliver 14.13% onsite affordable housing, subject to a clawback mechanism which is set out below.

- 5.275 This position was finally agreed between the applicant and the Council and is based on adopting a more cautious approach to market values given the current uncertainty in the housing market, as well as the fact that this is a largely untested location for new build dwellings as detailed in the report from CP Viability. This also included an adjusted land value, to reflect the additional information / evidence submitted by the applicant.
- 5.276 In terms of the clawback, this comprises of two main mechanisms to be secured in the S106. The first part requires an analysis to be carried out by the developer at 25% occupation of each phase, to determine whether the build costs and sales receipts associated with the development, results in any increase in profit.
- 5.277 In the event that the analysis shows a surplus profit above the agreed amount in the submitted viability report, then additional Affordable Housing will be required on that phase above the required amount of 14.13%, but up to 23%. The developer will then be required to submit a further affordable housing scheme for that phase incorporating the additional affordable housing and not to occupy more than 50% dwellings until the additional affordable housing has been constructed in that phase.
- 5.278 The second part of the clawback requires a further analysis to be carried out at 75% occupation of each phase with any surplus profit above an agreed amount to be shared between the applicant and the Council on a 50% to 50% split being paid as a financial contribution towards affordable housing.
- 5.279 Substantive matters are now resolved regarding the assumptions and inputs to be included in the review mechanism (to ensure that this is an appropriate basis to recover an uplift in the viability.) and this will be finalised in the final drafting of the S106.
- 5.280 On this basis it is therefore recommended that in order to deliver the development, the affordable housing requirement comprises of 14.13% onsite affordable housing. Notwithstanding this, it is recommended that the clawback mechanism outlined above is included within the S106. This would allow for a re-examination of the scheme at each phase of the development should market conditions improve and the scheme was to be more viable than expected. Subject to the inclusion of the above the proposal is considered to accord with the requirements of JCS Policy 4, the NPPF and the Government's Guidance on Viability.

Healthcare

- 5.281 Paragraphs 92 to 103 of the NPPF relate to the promotion of healthy and safe communities. These paragraphs include the consideration of a wide range of matters that contribute to achieving healthy, inclusive and safe places. Paragraph 96 refers to public services, stating that to ensure faster delivery of other public service infrastructures such as hospitals local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.
- 5.282 The adopted development plan for Norwich comprises the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk and Norwich's Site Allocations and Development Management plans.
- 5.283 The JCS at policy 7 recognises that health infrastructure will need to be provided to support growth and requires Health Impact Assessments to be undertaken when large-scale housing developments are proposed. These assessments consider the effect on health and social care services along with how the development supports healthy lifestyles and related factors such as crime, social cohesion air pollution etc. Policy 4 of the JCS indicates that provision will be made for the expansion of the Norfolk and Norwich University Hospital (NNUH) to meet the needs of growing communities and healthier lifestyles will be promoted by maximising access by walking and cycling and providing opportunities for social interaction and greater access to green space and the countryside.

- 5.284 The Greater Norwich Authorities operate CIL which is allocated through the Infrastructure Investment Fund. Healthcare is not infrastructure identified in the Greater Norwich CIL Charging policy and contributions from CIL therefore cannot be sought from health providers.
- 5.285 S106 obligations are used to mitigate the direct impacts of a development proposal and make it acceptable in planning terms. Obligations may only constitute a reason for granting planning permission for the development if they meet all three of the statutory tests set out in Regulation 122 of the CIL Regulations 2010:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
- 5.286 A Health impact assessment has been submitted in support of the planning application which recognises that local provision in terms of GP practices is currently good with all GP practices identified in this assessment accepting new patients. However it recommends that the developer works with NHS Norfolk and Waveney Clinical Commissioning Group to determine an appropriate contribution to developing local health services in the area when the future resident population can be estimated with greater accuracy.
- 5.287 NHS England position is that new development should contribute to the cost of expanding and building new infrastructure and investing in new facilities, which they indicate is required as a result of the development.
- 5.288 NHS England have indicated that there is insufficient capacity at Long Stratton Medical Practice to accommodate the population growth from the development and cumulative development in the area. It advises:
- “The proposed development is likely to have an impact on the services of 1 GP practice and its branch surgery, operating within the vicinity of the application site. The GP practice does not have capacity for the additional growth resulting from this development and cumulative development in the area. The proposed development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated.”*
- 5.289 Para 5.1 of NHS England comment states:
- “The development along with planning application 2018/0112 would give rise to a need for improvements to capacity, in line with CCG Estates Strategy; by way of an extension for the benefit of the patients at Long Stratton Medical Practice; a proportion of the cost of which would need to be met by the developer. Additionally three number new GPs are required at an average recruitment cost of £10,000 per GP, therefore £30,000 is also needed as mitigation (£20,000 for 2018/0111 and £10,000 from 2018/0112.”*
- 5.290 NHS England indicate in this 2018 response that there was 122.51sqm capacity at the surgery; 262.12sqm floorspace required to meet the proposed growth from the development; and based on a formula applied by them this equates to £602,945 for 2018/0111 and 2018/0112 combined.
- 5.291 The Council accepts that there can be a localised impact on primary health care premises (GP Surgery) as a direct impact population growth has on a practice list size and premises requirements.

- 5.292 It is noted however that the comments from NHS England date back to 2018 and since this time the Clinical Commissioning Groups (CCGs) have been replaced by Integrated Care Boards (ICBs) which may change the substantive comments on health care impacts identified. Furthermore it is evident since those 2018 comments, the medical practice has secured planning permission granted 16 September 2022 (2022/1482) for an extension to the building and carparking within the site which includes 7 additional consulting rooms. The NHS have been re-consulted a number of times on revised proposals however have not provided any further comments and there is likely therefore be a degree to which those comments are out of date in considering the capacity of that surgery and therefore NHS assessment of the localised impact. Furthermore this impact and mitigation sought needs to be considered in light of the recent Leicester NHS Trust v Harborough District Council High Court judgement where it was held that an NHS contribution was not Reg 122 compliant because the NHS Trust was unable to demonstrate that there would be a funding gap for the provision of health services attributable to the occupation of housing on the site. For the contributions currently being sought to be Regulation 122 compliant, NHS England will now need to satisfy the Council that the applications create a localised impact and that the contribution sought would mitigate this impact. As discussed further below, if NHS England can demonstrate that the contribution is CIL compliant, in light of the viability constraints on the development, whether a contribution can be secured will need to be weighed up against the other contributions being sought.
- 5.293 NHS England and the ICB have therefore been re-consulted on the application specifically seeking an update on their comments to address the above matters.
- 5.294 It should also be noted that subject to the comments of NHS England/ICB the Council needs to consider as a matter of judgement as to whether the three tests in reg.122(2) of the CIL Regulations 2010 are satisfied and whether it would be appropriate to require a financial contribution to be made, after taking into account other requirements and any impact on the viability of the scheme
- 5.295 As has been set out elsewhere in this report (viability) the scheme is not viable when accounting for all other planning policy requirements and a significant reduction in planning obligations has been negotiated on the basis of a Viability Assessment. Having regard to viability (which the Council affords significant weight) therefore, notwithstanding what the extent of the contribution sought from NHS England is, the scheme is not viable and it is therefore likely to be difficult to secure a healthcare contribution also having regard to other planning obligations to be secured (which are afforded a greater weight -affordable housing; highway and travel impacts; social infrastructure to support the development and healthy lifestyles).
- 5.296 To conclude, Officers are seeking an update from NHS England and the Integrated Care Board (ICB) on their assessment of health impacts and any mitigation sought from the development. However it is evident having regard to the viability of the scheme and other obligations necessary to secure (which have already been compromised) that the Council is unlikely to be able to secure health care contributions from the development. Officers are therefore seeking delegated authority to resolve and materially consider the identified impacts having due regard to the viability of the scheme.

Norfolk Constabulary

- 5.297 Norfolk Constabulary have identified that this application in combination with application ref 2018/0112, will place additional pressure on police resources. To address this, further investment has been requested to enhance provision and infra structure. In terms of police resources, there is a range of infrastructure and capital costs including new build facilities and extensions and adaptations to existing police stations. Norfolk Constabulary have not identified a need for new build facilities or significant extension to existing buildings, but consider that a contribution of £50

per dwelling would be an appropriate level to be secure by s106 agreement (or CIL). The Council considers that the contributions do not meet the tests within Regulation 122 of the Community Infrastructure Regulations (CIL) as they do not provide sufficient evidence to support its position. As such it is considered that further investment in terms of policy resources, which is not an agreed position with the Norfolk Constabulary, should be explored outside of this application.

Sustainable construction/renewable energy

- 5.298 Policy 1 and 3 of the JCS require the sustainable construction of buildings and water conservation in addition to requiring 10% of the predicted energy requirements to be delivered by on site decentralised and renewable or low carbon energy. Furthermore, electric vehicle charging points and energy supply will be required as part of new Building Regulations. Precise details of how the proposed development would comply with the policy requirements set out above could be secured by condition, however, it is expected that the development would meet, and most likely even exceed, the prescribed sustainability measures.

5 year housing land supply (5YHLS)

- 5.299 With regards to the land supply position, the Council currently has less than 5 years of deliverable sites.
- 5.300 Whether or not the tilted balance at paragraph 11dii is engaged is dependent on whether the impacts on Protected sites (nutrient neutrality) are addressed i.e. are they a policy of the NPPF that otherwise directs refusal. However the benefits to housing delivery in the circumstance of no 5YHLS is afforded significant weight. It is also evident in this case that the site is delivering housing against an adopted allocation and as set out later in the report in the planning balance, any adverse impacts are outweighed by the benefits.

Developer Contributions

- 5.301 Developer contributions are highlighted throughout this report and will be secured through the S106 and the payment of CIL in terms of the planning obligations required to make this development acceptable.

Other Issues

Environmental Impact Assessment (EIA)

- 5.302 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.
- 5.303 The topics included in the Environmental Statement is set out earlier in the report.

As part of my assessment I have considered and assessed the direct and indirect significant effects of the proposed development on the following factors:

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under EU Directive
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape; and
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d); and
- (f) cumulative impact

- 5.304 The operational effects of the proposed development have been considered where appropriate, and any significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

- 5.305 The residual impacts arising from the proposed development - as amended - range from major beneficial to, at worse, major/moderate adverse. The majority of impacts are negligible or not significant, with moderate or major adverse impacts relating to heritage assets as noted in the above assessment (Church of St Michael and Nos. 1 & 2 Church Lane at Stratton St Michael, and Rhees Green Cottage) and some minor to major adverse changes relating to changes in noise of some properties typically in existing quieter locations with the bypass relating to the east planning application, which will be the subject to mitigation. Many of the adverse impacts are short-term and temporary in nature with most being reduced in their significance with time and as the effectiveness of the mitigation measures are put in place to manage and reduce these impacts.
- 5.306 For this reason, taking into account proposed mitigation measures it has been demonstrated that - where possible and through the design evolution of the proposals - potential significant environmental effects have been avoided in the first instance. Where this is not possible the potential environmental effects have been reduced through mitigation. This has resulted in the Proposed Development, which has regard to minimising its environmental effects and delivering a sustainable form of development.

Equalities Impact Assessment

- 5.307 Under section 149 of the Equality Act 2010, the Council has had due regard to the impacts of this proposal, in respect of layout, design and connectivity, on those groups with protected characteristics. It is considered that the benefits of this proposal outweigh the negative impacts having regard to the Act.

Local Finances

- 5.308 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.

CIL

- 5.309 This application is liable for Community Infrastructure Levy (CIL).

GIRAMS & Appropriate Assessment

- 5.310 This application is liable for Green Infrastructure Recreational Avoidance Mitigation Strategy (GIRAMS) tariff. This quantifies the recreational impact from development on the Protected Sites (SAC and SPA) and is an appropriate basis on which to measure impact and appropriate mitigation.
- 5.311 Nonetheless, as the proposed development would deliver sufficient on-site open space to meet the necessary green infrastructure standards, it is not necessary to seek a contribution towards off-site green infrastructure (the GI element of the tariff).
- 5.312 As set out within the ecology section of this report, a RAMs contribution would be sought and secured through the S.106.
- 5.313 Therefore when taken together it is considered that the proposed mitigation, in so far as it relates to the recreational impacts of the development only, adequately addresses the direct impacts of the development on the integrity of the Protected Sites (SPA and SAC) and accordingly the Council as the Competent Authority can satisfactorily conclude that there will be no likely significant effects and the application can safely be determined with regards the Conservation of Species Habitats Regulations 2017 (as amended).

- 5.314 It should be noted that the integrity of the Protected sites having regard to impacts on nutrients is still outstanding and the Council's Appropriate Assessment will need to consider any in combination effects of the recreational impacts and the nutrients impacts. This will be completed inline with the outstanding nutrient neutrality matters.

Conclusion

- 5.315 The site forms part of the land allocated for residential development and a bypass in the Long Stratton Area Action Plan (LSAAP) forming part of the Council's Development Plan.
- 5.316 Key to the allocation policy is the delivery of the bypass alongside the housing and it is evident that the ability to deliver the bypass is made possible through the public/private sector partnership in regards to funding. The bypass scheme will be delivered by Norfolk County Council subject to planning permission being granted, and currently has a construction duration of 18 months, programmed to commence in April 2024. The public sector funding is significant and enables the bypass to be delivered inline with Area Action Plan triggers which is proposed to be secured by condition.
- 5.317 Notwithstanding the public sector funding secured for the bypass, there is a significant shortfall in the viability of the scheme resulting in a reduction in obligations required by planning policies including affordable housing, travel planning, works to improve pedestrian and cycle connectivity in Long Stratton.
- 5.318 On balance having regard to the viability appraisal conducted it is considered that the scheme meets the requirements of Policy 4 of the JCS on the basis of the Council's negotiated position to achieve 14.13% (265 units across both applications) onsite affordable housing and importantly a clawback mechanism secured as outlined above to allow for a re-examination of the scheme at each phase of the development should market conditions improve.
- 5.319 The works to deliver connectivity from the development to the existing settlement is a negotiated sum having regard to viability and having regard to the significant weight afforded to the delivery of the bypass, on balance officers consider in this circumstance this to be an acceptable contribution.
- 5.320 There are outstanding matters in respect of the impact on health and officers are seeking delegated authority to resolve this matter, although on the basis of an already significantly compromised position in regards to viability.
- 5.321 The Environmental impacts of the development, including cumulative impacts, have been assessed within this report and officers consider that the impacts of the proposed development remaining after mitigation has been implemented, which range from major beneficial to major/moderate adverse, have been adequately assessed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).
- 5.322 While a mitigation scheme has recently been submitted with regards to Nutrients neutrality, the assessment of this by the Council (as competent authority) and Natural England as the statutory consultee is pending, however resolution of this is recommended to be delegated to officers to reach a final conclusion on the Appropriate Assessment.
- 5.323 As can be seen in the above assessment officers consider that the scheme complies with the requirements of the policies when taken as a whole (the Long Stratton Area Action Plan Allocation policy and all other relevant policies of the Long Stratton Neighbourhood Plan, the Development Management Policies Document, Joint Core Strategy) and the NPPF and would represent a sustainable form of development subject to resolution of the final outstanding matters.

5.324 On the basis of the above, delegated authority is therefore sought for the Assistant Director of Planning to approve subject to a S106 and the imposition of conditions necessary to make the development acceptable as set out in the report and any further conditions necessary at the discretion of officers in completing any decision and resolving the following key issues:

- Open space phasing
- Nutrient neutrality
- Noise and odour matters relating to Banham Poultry
- Drainage matters from the LLFA
- Re-consultation with the Integrated Care Board (ICB) in respect of the identified impacts on health and in particular the impact on Long Stratton Medical Centre

Recommendation : To authorise the Assistant Director of Planning to approve subject resolution of outstanding planning matters; to the satisfactory completion of a S106 legal agreement; and the imposition of conditions necessary to make the development acceptable as set out in the report and any further necessary at the discretion of officers in completing any decision.

Outstanding matters

Nutrient Neutrality - Consideration of the revised Nutrient Neutrality mitigation and shadow Appropriate Assessment received from the applicant, there being no substantive comments received from Natural England relating to Habitats Regulations in respect of Nutrient Neutrality and the Council being satisfied as Competent Authority that the likely significant effects of the development on the integrity of the site and its conservation objectives together with mitigation for the adverse effect on the integrity of the site are adequately addressed and secured.

Surface water drainage - Resolution of final matters relating to surface water drainage and receiving no substantive objection from the Lead Local Flood Authority and the imposition of any further conditions necessary.

Re-consultation with the Integrated Care Board (ICB) in respect of the identified impacts on health and in particular the impact on Long Stratton Medical Practice.

Satisfactory resolution of noise and odour matters relating to Banham Poultry to enable the Council to satisfactorily condition these impacts on the grant of planning permission.

Satisfactory completion of a S106 legal agreement to cover:

- Contributions towards delivery of the bypass
- Travel plan contribution
- A contribution towards enhanced cycle/pedestrian routes along the A140
- Contributions for skylark mitigation
- Affordable housing at 14.13%
- A review mechanism for affordable housing by phase
- Serviced land for the school site
- Serviced community land

- Off site hedging to mitigate the loss of habitat for the yellowhammer
- Open space and green infrastructure (quantum and phasing)
- Self build dwellings
- GIRAMS contribution regarding recreational pressure on Protected Sites
- Monitoring fees

Noting substantively the main elements are agreed however final detailed considerations to be delegated to officers to enable the S106 to be concluded.

Suggested conditions include:

Time Limit for outline and full permission

Submission of reserved matters for the outline

In accordance with submitted drawings

Design Code

Surface water drainage scheme

Submission of waste water strategy

Detailed design of the long-term wetland mitigation strategy

Foul water drainage scheme

Detailed highway plans

Compliance with highway details

Roads constructed to binder course surfacing level

Details of on-site parking for construction workers

Construction Traffic Management Plan and Access route

Details of off-site highway improvement work for the Swan Lane /

Details for the Long Stratton Bypass and completed prior to the 250th occupation of the development

Western Relief Road junction and implementation

Completion of Western Relief Road (including Public Rights of Way works) from Swan Lane to the A140

Details for the provision of a Pedestrian / Cycle crossing facility on the A140 and implementation

Pedestrian/cycle link up to the boundary of the site to St Michaels

Road as well as to Trumpeter Rise

Travel Plan

Infrastructure Phasing Plan

Marketing and delivery of the employment land

Housing with Care scheme

Self-build housing

Lighting Design Strategy

Construction Environment Management Plan for Biodiversity

Landscape and Ecological Management Plan

Biodiversity mitigation and enhancement measures

Biodiversity Method Statement

Biodiversity Net Gain Audit

Dark Corridors
Lighting design strategy for biodiversity
Further ecological surveys
Submission of a copy of the Protected Species licence
Contamination investigation and risk assessment
Unidentified contamination
Noise Assessment
Implementation of noise remediation scheme and validation
Odour Assessment
Implementation of changes to the masterplan or approved odour remediation scheme and validation

Lighting for residential amenity
Construction impacts and Management Plan
Contamination
Imported topsoil and subsoil evaluation
Archaeological written scheme of investigation and mitigation
Renewable energy
Water efficiency
Materials
Landscaping scheme, including boundary treatments and site levels
Landscaping scheme implementation
Soft and Hard Landscaping Strategy
Compliance with AIA, including TPP and AMS
Fire hydrants
Nutrient Neutrality Bypass related conditions

Informative notes where needed including attention for the need for land drainage consent

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