

**Advice for Redenhall with Harleston Town Council in respect of
Planning application 2022/0067 – Land east of Mendham Lane**

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Redenhall with Harleston Town Council has commissioned Compass point Planning and Rural Consultants to assist with the response to planning application reference 2022/0067 specifically :

1. Assessment of the proposal in the context of the Local Plan (adopted and emerging)
2. Assessment of the proposal in the context of the submitted Redenhall with Harleston Neighbourhood Plan
3. Recommendations on the response the Town Council should make to South Norfolk Council in respect of the application

Executive Summary

This purpose of this report is to aid Redenhall with Harleston Town Council in formulating their formal response to consultation on Planning Application No : 022/0067 – Land east of Mendham Lane.

The application seeks full planning permission for 354 dwellings, 91 extra care apartments, 16 extra care bungalows, public open space, allotments and 1.61 hectares of land for community use together with associated site infrastructure, demolition of existing agricultural buildings and a temporary construction access from the A143 on land east of Mendham Lane, Harleston. The applicants are Scott Properties and Saffron Housing Trust.

Conformity with Adopted and Emerging Local Plan Policies: Principle of Development

The application site is not specifically allocated for development in the existing Adopted Development Plan for the area. It is allocated for development similar in type and scale to the application in the emerging Greater Norwich Local Plan under Policy GNLP 2136. The GNLP has reached examination stage and can be given some weight in the determination of the application . The principle of development on this site is accepted by the Strategic Planning Policies.

The application is broadly in conformity with both Adopted and Emerging Local Plan policies. There are one or two areas where reassessment of scheme details would be beneficial particularly those relating to the design and appearance of the various forms of accommodation, for example the extra care apartment block and the elevations of the residential dwellings still appear ‘standardised’. The scheme would benefit from closer alignment with the South Norfolk Design SPD and the Redenhall with Harleston Design Guidelines and Code.

Conformity with emerging Redenhall with Harleston Neighbourhood Plan Policies

The Neighbourhood Plan has reached submission stage but is yet to be examined. It can be given a degree of weight in the determination of this application but this can only be limited weight, prior to examination.

The application is broadly in conformity with the emerging Neighbourhood Plan policies. The Neighbourhood Plan policies were drafted with the prospect of this specific application in mind and therefore many of the policies contain specific guidance that is applicable e.g. RWH23 in respect of the landscape buffer and RWH6 in respect of the land available for community use.

Response to the application

Redenhall with Harleston Town Council is advised to make the following response:

Principle of development:

No Objection as this has been established

Access and traffic generation:

a) Support for the provision of two vehicular accesses providing mitigatory routes for residents and emergency vehicles should either route be blocked by an accident.

b) Support for the inclusion of a temporary construction access from the A143 which will provide some relief for properties on Mendham Lane during the construction period.

c) Concerns are raised about the level of traffic using Mendham Lane, post construction and how this will affect the existing 'pinch point' and the safety and wellbeing of residents on Mendham Lane.

d) Support for the provision of pedestrian and cycle connections within the development.

e) Support for the provision of off street and visitor parking.

Housing Mix:

a) Support for the proposed mix of housing to meet local needs

b) Support for the provision of bungalows

c) Support for the provision of special needs/extra care housing although concerns about the potential impact of this on GP capacity.

Health Contributions:

a) High priority should be given to ensuring that necessary CIL funding is given to ensuring that sufficient health care provision is made in the town to accommodate this development without adversely affecting the level of provision in the town.

Design and Layout:

- a) Support for the general provision of green spaces and landscaping
- b) Further consideration should be given to the residential and extra care building designs, specifically the elevations in the context of the two pieces of specific design guidance available. The current designs lack local distinctiveness

Land for Community Use

- a) The provision of land for community use is welcomed in principle. Should land be made available to the Town Council for unspecified community use, then the Town Council will consider how best to establish the most appropriate use through community consultation.

Amenity/landscape buffers.

- a) Support for the provision of significant areas of open space, landscaping, and public access at the eastern end of the site adjacent to the A143 is consistent with the requirements of Neighbourhood Plan Policy RWH23.

Floodrisk

- a) Concerns raised at the potential for surface water and drainage from the site to lead to flooding elsewhere in the town; specifically where the proposal seeks to use existing drainage ditches that are already prone to flooding.
- b) Concerns raised in respect of the capacity of the Harleston Treatment plant to accommodate foul sewage from the development.
- c) The development should not exacerbate existing surface or foul water drainage problems or cause new ones within the town.

Section 1: Application Details and Description

- 1.1 The application comprises 354 dwellings, 91 extra care apartments, 16 extra care bungalows, public open space, allotments and 1.61 hectares of land for community use together with associated site infrastructure, demolition of existing agricultural buildings and a temporary construction access from the A143 on land east of Mendham Lane, Harleston. The applicants are Scott Properties and Saffron Housing Trust. The application is submitted in full.
- 1.2 The site extend to 27.1 hectares and is located on the eastern side of Harleston between the town and the A143. There is no relevant planning history for the site. The current use of the site is agricultural (the land is Grade 3) as well as containing an area of hardstanding and some agricultural buildings (proposed to be demolished), and the farmhouse (proposed to remain in situ and shown outside of the application site although engulfed completely within it). The northern boundary is bordered by residential development and agricultural land to the northeast, the A143 lies to the east, existing allotments are located to the south and residential and commercial development lies to the west. A public right of way runs through the middle of the site east– west (FP18) and another runs immediately along the northern boundary from Jay’s Green at Green Lane. FP 13 connects into Green Lane at its junction with Jay’s Green and heads north.
- 1.3 The Site is located entirely within Flood Zone 1 and is therefore at a low risk of fluvial or tidal flooding. There are some small pockets of surface water flood risk according to the Environment Agency flood maps, the main area of which runs through the north-eastern part of the site close to the A143.
- 1.4 The site is not within any areas designated for their nature conservation or heritage importance. It is not located in close proximity to any SSSIs¹; the closest site - Gawdyhill Big Wood is situated over 1.0km from the northern boundary. There are no Tree Preservation Orders on the site and the site is not located within Harleston Conservation Area, the closest point of which is approximately 250m to the west of the site. There are no listed buildings or other heritage assets within close proximity.
- 1.5 The application is accompanied by a raft of supporting documents including the Design and Access Statement and Planning Statement but also specific documents addressing issues such as health impact, transport, ecology, landscape, water, open space, flood risk, noise, contamination, archaeology, infrastructure, and energy.
- 1.6 Prior to submission of the application, the applicants submitted an Environmental Impact Assessment (EIA) Screening Request to the District Council who confirmed that full EIA in the form of an Environmental Report was not required for this level of development.

¹ Site of Special Scientific Interest – national nature conservation designation

- 1.7 Pre-application advice was sought from the District Council in September 2020 and the scheme has been refined through technical consultation with statutory consultees since that time - for example, originally 361 dwellings were proposed.
- 1.8 Access to the site is proposed from Mendham Lane where two new accesses are proposed . Internally within the site the road network will form two internal loops – a primary loop which effectively connects the two new accesses and a secondary loop which has two new accesses off the primary loop and extends into the northeast of the site. The main part bulk the development is located on the western side of the site where it is closest to existing development at the edge of the town. The majority of the open land uses which include landscaping. open spaces, land for community use and one of the attenuation lagoons are situated on the eastern side of the site adjacent to the A143. The extra care apartments are in the southern section of the site grouped together with the extra care bungalows immediately adjacent to the proposed Lidl store which is the subject of a separate application. The southern most of the two new proposed accesses will effectively serve i.e. be the most convenient for, the proposed Lidl, the extra care complex, and a small portion of the residential development whilst the northern most new access is likely to be that used by the majority of the residential development and anyone accessing the open space or community land by vehicle.
- 1.9 The residential units will be a mixture of detached, semi-detached, terraced and flatted properties, predominantly two stories in height but also including a significant proportion of bungalows. Some three storey buildings are also included in the more central parts of the development.

Proposed Housing Mix

- 1.10 The housing mix is shown as below:

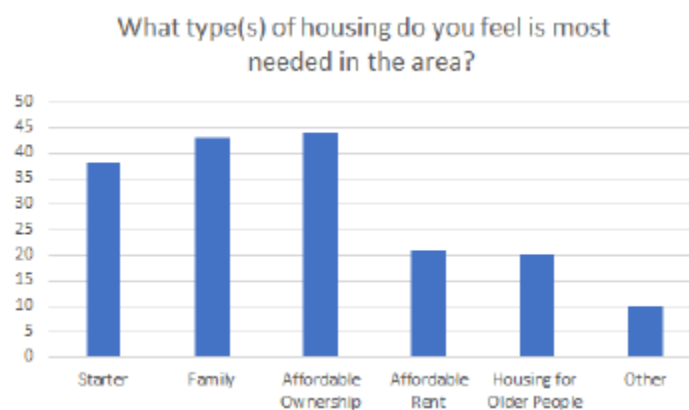
No of Bedrooms	Affordable	Private
1 bed	41	0
2 bed	61	54
3 bed	44	85
4 bed	5	64
Total	151	203

(Excludes extra care apartments and extra care bungalows)

- 1.11 The proposals will provide a grand total of 354 dwellings, with the affordable housing element equating to 43%. In addition, there will be a total of 91 extra care apartments and 16 extra care bungalows. Combining this provision with the total number of units indicates that the affordable housing delivery on site will equate to 56%.

Section 2: Community Engagement

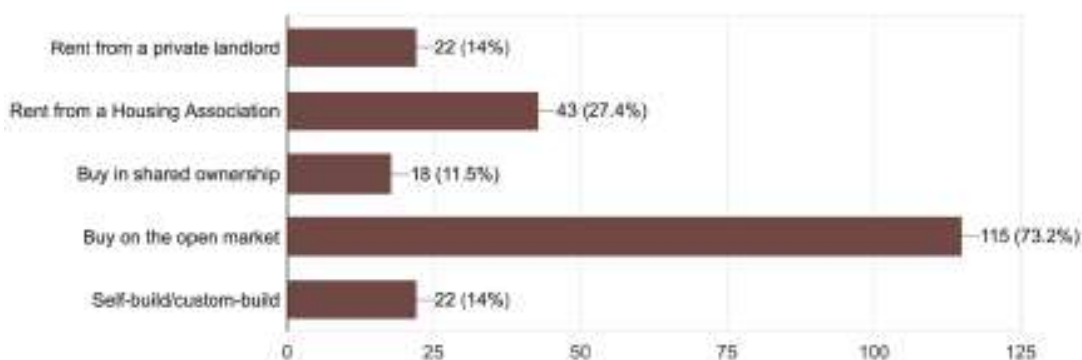
- 2.1 As expected for a scheme of this size, the application is accompanied by a Statement of Community Involvement prepared by Scott Properties which sets out the community engagement undertaken to date. The statement indicates that Scott Properties first met with Redenhall with Harleston Town Council in September 2018 to introduce the site. Six further meetings were held between 2018 and November 2021, to discuss the progress with the site and to present updated development proposals. In addition to the meetings, regular contact with the Town Council was maintained via email correspondence, and in September 2021, representations were submitted in response to the Redenhall with Harleston Neighbourhood Plan (Regulation 14) consultation. Additionally, in September 2019, Scott Properties met with the Diocese of Norwich Education and Academies Trust to understand the impact of development of the site on the primary school. In December 2019, a meeting was held with Action for Harleston to discuss the site.
- 2.2 Scott Properties held a public consultation drop-in event on Wednesday 13th October 2021 between 2pm and 7pm at the Swan Hotel in Harleston, followed by an online consultation for two weeks. To raise awareness of the consultation, leaflets were distributed to approximately 2,900 residential and business addresses within Harleston on Thursday 30th September. The leaflets contained information on the time, date, and location of the event, as well as how to access the consultation website. Over 70 people attended the drop-in event, with 914 unique visitors to the consultation website.
- 2.3 In total, 96 responses were received. Broad analysis of the event by Scott Properties revealed that in answer to the Question: 'Are you in support of new homes within Harleston?' Yes 44% No 38% Not Sure 18% . A slight majority being in favour of new homes. Respondents were also asked 'What type(s) of housing do you feel is most needed in the area?' The responses from the 67 respondents in total who answered this question are shown in the graph below taken from the Scott Properties statement



- 2.4 Respondents were able to select multiple types of housing: The most popular choice was affordable ownership, followed by family and starter homes. The most common suggestion for 'other' included bungalows, with other suggestions including 'no more housing,' 'larger houses with nice sized gardens,' 'affordable houses for first time buyers,' 'bespoke houses (something nice)', 'a higher percentage of private homes', 'affordable ownership to include 2 and 3 bed homes' and 'self-build plots.
- 2.5 Respondents were also asked to comment on the proposed layout to which 32% of respondents to this question described the layout as 'good', 35% as 'average' and 6% had 'no opinion.' 27% of respondents rated the layout as 'poor'. Comments on the Housing Mix were also sought which revealed that 24% of respondents rated the housing mix 'good', 41% as 'average' and 7% had 'no opinion'. 28% of respondents rated the housing mix as 'poor'. Public Open Space provision was rated by 28% of respondents as 'good', 41% as 'average', 25% as 'poor' and the remainder 'no opinion.'

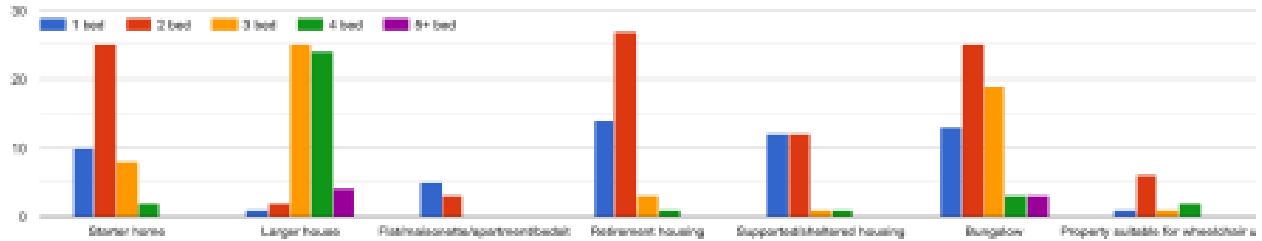
Neighbourhood Plan Consultation Data

- 2.6 It is useful to compare the above results with those from the Neighbourhood Plan Household Survey which was undertaken by the Town Council in March and April 2021.



What form of housing would you be looking for - Tenure?

- 2.6 For their next home 73% of respondents are seeking open market housing, rental from a housing association (27.4%), private landlord 14% and self-build 14%.



Type of Housing that you are looking for?

- 2.7 The most popular of new housing is 2-bedroom starter homes, followed by 3- and 4-bedroom larger homes, 2-bedroom retirement housing, some supported/sheltered housing and 2- and 3-bedroom bungalows. There was small interest in flats/maisonettes/apartments/bedsits, and properties suitable for wheelchair users.

Community Facilities

- 2.8 The Neighbourhood Plan Survey also asked residents for their views on what additional facilities (both indoor and outdoor) they felt the town would need as a consequence of new development, should an appropriate site become available. . The results are as follows:

Indoor Facilities



Outdoor Facilities

- 2.9 The most popular choices were outdoor open space, followed by outdoor seating areas, new walking and cycling routes, and the provision of areas for young people and teenagers.

Future Management and Ownership

- 2.10 The Planning Statement that accompanies the application refers to the transfer of 1.61 hectares of land to be used for community use and the transfer of 0.65 hectares of land for allotment use although the precise terms of these transfers and to whom is yet to be identified.

Section 3: Current Planning Policy context

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that a planning application must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 3.2 The current statutory development plan for the area comprises the Adopted Greater Norwich Joint Core Strategy (JCS), the Adopted South Norfolk Development Management Policies (DMP), and the South Norfolk Site Specific Allocations and Policies Document 2015. The JCS is in the process of being replaced by the Greater Norwich Local Plan (GNLP) which is relatively well advanced and has reached the public examination stage. In addition the Redenhall with Harleston Neighbourhood Plan is also relatively well advanced and is currently the subject of its Regulation 16 Submission Consultation which is due to end on 18th March, with examination expected in early April.

Section 4: Assessment of the proposal in the context of the Local Plan (adopted and emerging)

4.1 Adopted and Emerging Local Policy:

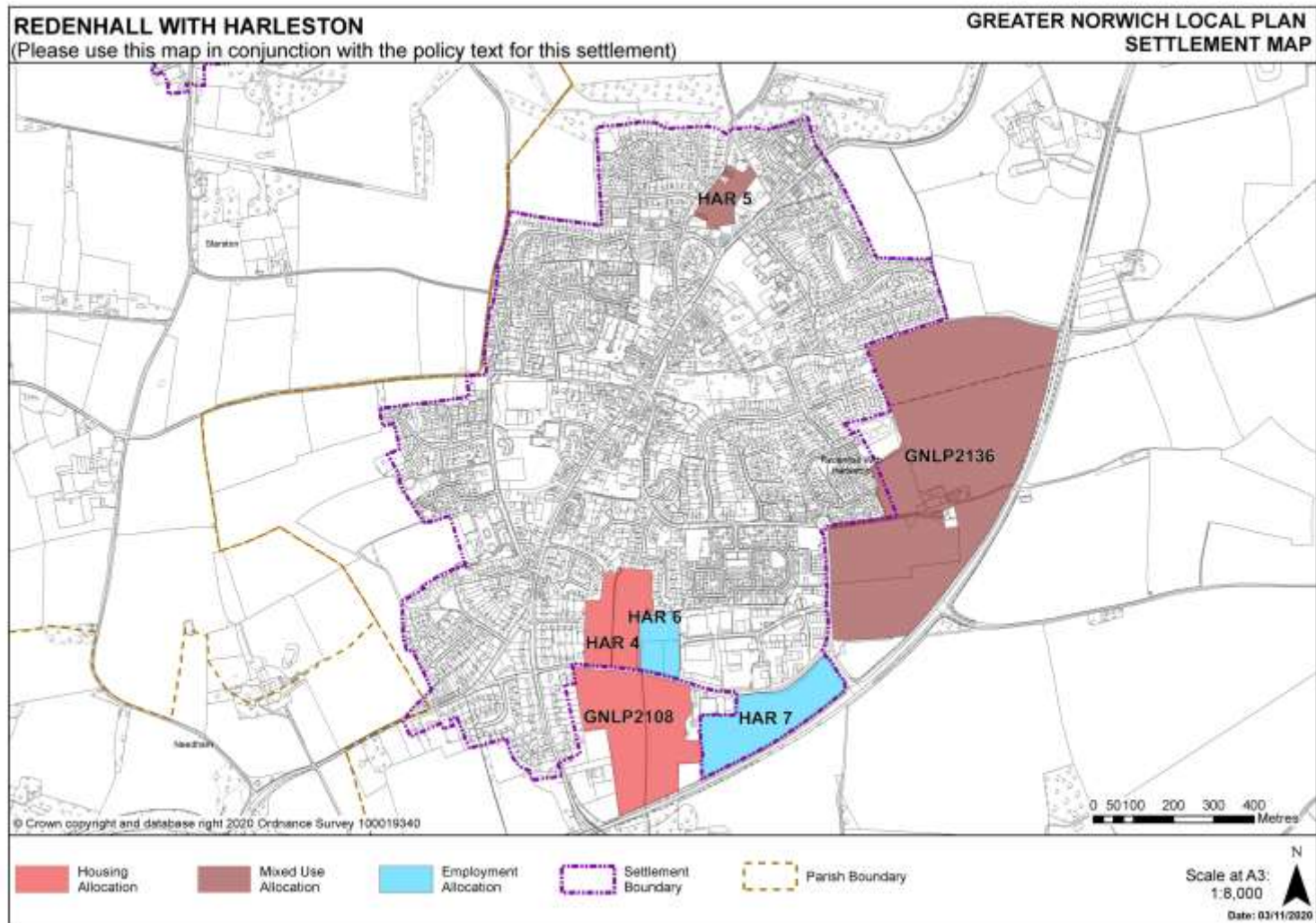
- 4.1.1 The site lies outside of the Settlement Boundary for Redenhall with Harleston as identified in the Adopted Development Plan. It is however specifically identified for development in the emerging GNLP under Site/Policy GNLP02136 for mixed use development. The policy identifies the site for 360 dwellings plus 90 units of extra care housing.
- 4.1.2 Paragraph 48 of the National Planning Policy Framework (NPPF) makes clear the position when there are adopted and emerging plans and the weight to be attributed to each:
- Local planning authorities may give weight to relevant policies in emerging plans according to:*
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).*
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given).*
 - and*
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the*

Framework, the greater the weight that may be given).

- 4.1.3 Paragraphs 49 and 50 of the framework also indicate that in the context of the presumption in favour of sustainable development refusal of an application on the grounds that it is premature will seldom be justified, especially in circumstances where a plan has been submitted for examination: or in the case of a neighbourhood plan before the end of the local planning authority publicity period on the draft plan.

Principle of Development and conformity with strategic policies

- 4.1.4 In this case, although the application site as mentioned above, is not specifically identified in the Adopted Local Plan for development. It is, however, immediately adjacent to the settlement boundary, and it is specifically identified in the emerging Local Plan which has reached a point where some weight could be attributed to it. The principle of development on the site does not therefore appear to be unacceptable in strategic policy terms.
- 4.1.5 In addition, Redenhall with Harleston is identified as a Main Town in both the Adopted JCs and the Emerging GNLP. These are locations at the top of the settlement hierarchy where new growth is expected to take place. Redenhall with Harleston has a strong local employment bases and support a wide range of shops and services and a full range of facilities including a primary school, secondary school, doctor's surgery, leisure centre, library and a variety of sports clubs and recreational opportunities. It therefore is considered in strategic planning policy terms to be a relatively sustainable location for growth.
- 4.1.6 Policy 1 of the GNLP requires at least 1,655 new homes to be delivered in the Main Towns between 2018 and 2038 in order to meet the overall housing requirement of 49,500 homes across the Local Plan area. Policy 7.2 The Main Towns confirms that the plan allocates two sites to the southeast of the town centre to provide 550 new homes including specialist retirement accommodation, in addition to the existing planning permission commitment of around 170 dwellings. The Plan considers that growth of just under 800 new homes in Harleston to 2038 will support the retention and expansion of services and jobs in an attractive market town, as well as providing accommodation for older residents. The application site is the largest new allocation in Harleston and is consistent with the strategic framework set out by both the Adopted JCS and the Emerging GNLP. (See GNLP Map below)



Extract from the Regulation 19 Version of the GNL2021.

Housing Needs

- 4.1.7 Policy 5 of the GNLP emphasises the need for the Local Plan to meet the needs of its community. This is not just in terms of affordable housing but also through the provision of specific housing to meet specific needs where these are identified. Within Norfolk as a whole, the delivery of housing to meet the needs of an ageing population is increasingly important. The application includes significant extra care facilities in the form of the 91 apartments and 16 extra care bungalows on top of the proposed % of affordable housing and a higher than usual provision of bungalows goes some considerable way to satisfying this policy objective and is in accordance with this policy.

Conformity with Site Specific Allocation

- 4.1.8 The application site is specifically identified for development through Policy GNLP 2136 of the emerging Plan which provides the detail of the form of development expected. The policy states:
“...The site is likely to accommodate approximately 360 homes, of which around 60 will be single storey dwellings aimed at the active elderly. In addition to housing, the mix of uses is also to include a 90-unit extra care housing scheme 0.8 ha of retail or employment land, 1.6 ha for community use, allotments, and public open space.”
- 4.1.9 The application as submitted proposes 354 homes (-6) , a 91 (+1) unit extra care apartment block and 16 extra care bungalows (+16). Of the 354 homes, 45 of these units have been designed as bungalows which when combined with the 16 extra care bungalows, will deliver a total of 61(+1) bungalows on the site.
- 4.1.10 In addition, as set out in the submitted documents, the application includes an area of 1.61ha of land suitable for community use which it is proposed can be transferred to the Town Council or another public body by way of Section 106 Agreement. An area of 0.65ha is also identified for future allotment provision which can also be transferred. The areas proposed are in accordance with that outlined in the specific GNLP policy and therefore the application is in accordance with that part of the Local Plan.
- 4.1.11 The application also provides for areas of public open which appear to be in broad conformity with South Norfolk’s Open Space Supplementary Planning Documents (SPD).
- 4.1.12 Policy GNLP2136 refers to 0.8ha of retail within the scope of the allocated site. The application site boundary does not cover the whole of the allocated site and excludes 0.81ha which is currently the subject of an application for a Lidl store. The supporting documents to this application make it clear that it is not the intention to prejudice the delivery of the retail or employment element and that access and infrastructure provision have been jointly planned.

- 4.1.13 When considered as a whole, therefore it appears that the applications satisfies the strategic policies governing the site and the principle of the form of development proposed by this application would appear to be in conformity with them.

Key Issues: Highways and Access

- 4.1.14 It is not unusual for a development of this size to create concerns over increased traffic levels and highway safety. Paragraph 110 of the NPPF indicates when assessing specific applications for development opportunities to promote sustainable modes of transport should be taken up and that a safe and suitable access to the site can be achieved for all users. Paragraph 111 of the NPPF is explicit that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.1.15 Policy DM3.11 of the Adopted DMP relates to highway safety and Policy DM 3.12 relates to parking. Policy DM 3.11 seeks to ensure that proposals will not endanger highway safety or the satisfactory functioning of the highway network. In addition, Policy DM 3.10 promotes sustainable transport and development objectives encouraging opportunities for development to be integrated with local sustainable transport networks.
- 4.1.16 As referred to above the proposed access arrangements comprise two separate vehicle points, both with priority T-junctions taken from Mendham Lane. The proposed accesses are Type 2 Roads with 6m wide carriageways and appropriate visibility splays, and these meet the appropriate standards. The application also includes a new 2m wide footway which runs along the inner side of the main loop road with a 3m wide footway/cycleway provided on the outside side, which provides a connection with Mendham Lane. A new 3m wide footway/cycleway will run along the entirety of the western site frontage on Mendham Lane from the existing allotments in the south to the Mendham Lane/Harvest Way roundabout and public footpath FP18 to the north. Public footpath FP18 runs across the site in an east-west direction and currently serves as access to the farm buildings and farmhouse. With the demolition of the farm buildings and access provision to the farmhouse via the estate roads, there will no longer be a need for vehicle movements along the route of the footpath, which may result in an improvement for users. Pedestrian links are shown as being provided from the north of the development to Jay's Green, providing connections to public footpath FP13 and Green Lane and then onwards to the rest of the town.
- 4.1.17 The Transport Assessment includes capacity assessments which indicate that both proposed site access junctions with Mendham Lane and some nearby junctions are likely to experience some degree of increase in traffic, post development which is to be expected. The results of the analysis shows that all junctions are likely to operate well within capacity under the worse-case scenario tested and the County Council as

Highways Authority will take a view. However it would appear that the proposal is capable of being compliant with adopted policies relating to highway safety.

- 4.1.18 The application includes the provision of convenient secure cycle parking facilities aimed at encouraging a modal shift. The parking provision is also compliant with adopted standards for residential parking includes visitor spaces throughout the development. Parking provision for the 91 extra care apartments is 46 vehicle parking spaces and a further 32 spaces for the associated bungalows. There are no specific adopted standards for development of this nature to measure compliance against. However the application does appear to be compliant with adopted standards and therefore is compliant with adopted policies relating to parking provision.
- 4.1.19 The overall site layout will provide increased opportunities for walking and cycling, and there is a proposed continuous pedestrian link which provides access into the town centre and beyond. This is compliant with policies relating to pedestrian access and movement.
- 4.1.20 The application includes a proposal for a direct link from the A143, to be used as a temporary construction access for the duration of the development. This would be likely to reduce vehicle movements to and from the site along Mendham Lane during construction and also would mean that there will be less noise, dust, and general disturbance to residents along Mendham Lane whilst construction is taking place.

Key Issues: Design and Layout

- 4.1.21 Paragraph 126 of the NPPF sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development and helps make development acceptable to communities.
- 4.1.22 In addition, paragraph 130 of the NPPF indicates that planning policies and decisions should ensure that developments function well and add to the overall quality of the area. They should be visually attractive as a result of good architecture, layout, and effective landscaping and establish a strong sense of place using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work and visit.
- 4.1.23 Adopted DMP Policies DM 3.8 and JCS Policy 2 seek to promote good design together with the guidance contained in the South Norfolk Place-Making Guide Supplementary Planning Document which also seeks to promote and secure high quality design in all new development within South Norfolk. In addition, policy DM 4.9 requires that development proposals must demonstrate a high quality of landscape design.

- 4.1.24 The Design and Access Statement sets out a detailed assessment of the respective site context, opportunities, and constraints, and establish the rationale for the design approach which has been followed. They explain how the site layout, scale and form of development has been approached having regard to the respective uses and site context.
- 4.1.25 Despite this detailed analysis of context and character, and the guidance provided by the Adopted DMP policies and the South Norfolk Design SPD, the proposed housing designs, specifically the elevations could include more bespoke details and designs. Details such as window arches, details over doors, door and window types, porches etc appear to be standard designs that could be from anywhere and do not really invoke a real flavour of Harleston.
- 4.1.26 The design of the extra care apartments which are located in a highly visible position towards the entrance of the site from the southern access, as proposed currently present a highly 'institutionalised' appearance reminiscent of a single building such as a hospital or sports complex rather than individual homes brought together for a communal feel. Such an impression is exacerbated by its scale and height and therefore amendments to the elevations which would engender a more individualistic feel by having a less standardised approach would enable the proposal to be more compliant with the objectives of the policy in respect of high-quality design that respects its context.

Key Issues: Housing Mix and Affordable Housing

- 4.1.27 Adopted DMP Policy 3.1 requires that all housing proposals should help contribute to a range of dwelling types and sizes to meet the requirements of different households. Policy 4 of the JCS indicates that on sites of 16 dwellings or more a target proportion of 33% affordable housing will be sought with an approximate tenure split of 85% social rented and 15% intermediate tenures.
- 4.1.28 Policy 5 of the GNLP requires that 33% of the dwellings on a site should be affordable and highlights the pressing need for the delivery of accessible and specialist housing. Policy 5 also requires at least 20% of homes to be constructed to Building Regulations M4(2)[1] standard. All of the 107 extra care units proposed by this application will meet this standard, meaning that the development will deliver 23% of compliant units against this requirement.
- 4.1.29 One of the applicants is Saffron Housing Trust who are a well-known affordable housing provider locally and there has been pre-application discussion with the Council's Housing Enabling Officer. As mentioned above, the residential element of the scheme will deliver a total of 354 houses of which 43% would be affordable. There would be a range of house types including 1-to 4-bedroom units. The extra care apartment block and bungalows would deliver a further 107, one and two bed affordable units, increasing the total on-site affordable percentage to 56%. The application will deliver over and above the affordable housing requirement as well

as catering for the needs of older residents. Therefore the application is considered to be compliant with the relevant policies on this subject.

Custom Build

4.1.30 As mentioned above Adopted DMP Policy DM 3.1 requires all housing proposals to help contribute to a range of dwelling types and bed spaces to meet the requirements of different households. Policy 4 of the JCS requires that all housing proposals contribute to providing the range of housing required to provide balanced communities and meet housing needs in the area. Both these adopted policies are silent on the subject of self and custom build and as such there is no strict policy requirement to deliver plots under the adopted local plan. Emerging GNLP Policy 5 of requires that residential schemes, with the exception of flats, provide at least 5% of plots as serviced self/custom build plots. The application provides for the delivery of 16 such plots and is therefore compliant with the emerging GNLP policy.

Key Issues: Heritage & Archaeology

4.1.31 Adopted DMP Policy DM 4.10 requires that all development 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. Adopted JCS Policies 1 & 2 address the protection of heritage assets and the need to respect the historic environment. The application is accompanied by an Archaeological and Heritage Assessment which indicates that the site does not contain any designated heritage assets, it is outside of the Conservation Area and only 1 listed building is in close proximity to the site- the former Railway Station building. The Heritage Assessment has considered the impact of the proposal on the significance of the listed building as required by national and local policy and concluded a negligible impact. Statutory consultees will determine whether this assessment is correct, and whether the application is compliant with the policy.

4.1.32 The applicants submitted a pre-application enquiry to the Norfolk County Archaeology team who confirmed that further site investigation, including trial trenching would be necessary, however, they were satisfied that this could be dealt with by way of planning conditions. This approach is considered proportionate in line with advice contained at paragraph 205 of the NPPF and with the adopted policies.

Key Issues: Landscape

4.1.33 Paragraph 174 of the NPPF states that planning policies should contribute to and enhance the natural local environment by a range of measures including protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. Adopted DMP Policy DM 4.5 seeks to protect landscape character areas and river valleys and Policy DM 4.9 identifies the importance of incorporating landscape into design. JCS Policy 2 seeks to promote good design and requires

development proposals to respect local distinctiveness, including the landscape setting of settlements and the urban rural transition. Policy 3 of the emerging GNL requires development proposals to conserve and enhance the natural environment.

- 4.1.34 The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) which concludes that the site is heavily influenced by the existing settlement edge of Harleston, in particular the southern, central, and western sections of the site and by the presence of the A143 which is a prominent infrastructure feature within the setting of both the site and the Town. The greatest adverse visual impacts identified were upon the residents of Briar Farm and Barley Close where residents were anticipated to experience an adverse effect of Major/Moderate significance. Residents of Jay's Green, Harvest Way and Thresher Way are all anticipated to experience an adverse effect of Moderate significance, which is considered to be of lesser significance. These effects will need to be taken into account in the planning considering the overall effects of the proposed development balance made when the application is determined.
- 4.1.35 Attempts have been made in designing the site to minimise the impacts identified above, specifically for the occupiers of Briar Farm, Barley Close, Jay's Green, Harvest Way, and Thresher Way by retaining existing boundary vegetation, incorporating open areas and attenuation lagoons, introducing landscape buffers, and sensitive siting and orientation of those dwellings in closest proximity. Properties at the application site edges are predominantly single storey, and the site layout provides for green vistas that permeate the development.

Key Issues: Open Space

- 4.1.36 Adopted DMP 3.15 covers open spaces and requires that new housing development will be required to provide adequate outdoor play facilities and recreational open space which is proportional to meet the needs of future occupants. JCS Policies 1 & 8 set out a strategy for multifunctional green infrastructure networks and an expectation that new development will provide for local leisure activities including open space provision. Further guidance is contained in the South Norfolk Open Space SPD. The recreational open space provision proposed by the this has been designed to comply with the requirements of the SPD and this policy.

Key Issues: Drainage and Flood Risk

- 4.1.37 Adopted DMP Policy 4.2 covers sustainable drainage and water management and seeks to ensure that sustainable drainage measures are fully integrated within the design of new development and will minimise the risk of flooding on and off-site. These requirements are supported by Policies 1, 2 & 3 of the JCS and Policy GNL2136 which requires appropriate investigation works and mitigation measures to address the surface water flooding to the north-east of the site.

- 4.1.38 A Flood Risk Assessment and Drainage Strategy (FRA) accompanies the application. The site is entirely within Flood Zone 1 and the Flood Risk Assessment largely considers the management of surface water run-off, together with flood risk from sources other than rivers and the sea. Surface water arising from the developed site should, as far as practicable, be managed in a sustainable manner to mimic the surface water flows arising from the site prior to the proposed development, while reducing the flood risk. Concerns have been raised by the Redenhall Flood Group in respect of the proposal to use existing drainage ditches to manage drainage and the potential impacts upon the Starston Beck. They request that better on-site drainage measures are included in the application rather than relying on existing ditches that are already prone to flooding. In addition they raise concerns about the capacity of the Harleston Treatment Plant to accommodate the additional foul sewage levels generated by the development. Norfolk County Council as Local Lead Flood Agency has objected to the application on the basis of the flood risk assessment and drainage strategy being inadequate. Further evidence is required in respect of consent for the alteration to the watercourse network, detailed information regarding phasing and maximum flood levels and finished ground floor levels.

Key Issues: Ecology

- 4.1.39 Adopted DMP policies 1.4 and DM 4.4 seek to protect and improve natural environmental assets, promote net environmental improvements, improve the resilience of ecosystems, and protect the water environment. JCS Policies 1 & 2 seek to protect and incorporate environmental assets into new development and deliver biodiversity gains. Emerging GNLP Policy 3 indicates that development proposals will be required to conserve and enhance the natural environment as well as deliver biodiversity net gains.
- 4.1.40 The application is accompanied by ecological assessments. There are no formal nature conservation designations on the site and protected species surveys have been carried out.

Key Issues: Trees

- 4.1.40 Adopted DMP Policies DM4.4, DM4.8 and DM4.9 seek to protect and improve the highest status natural environmental assets. In particular Policy DM 4.8 promotes the retention and conservation of significant trees and encourages appropriate future management. JCS Policies 1, 8 & 9 seek to protect and incorporate environmental assets into new development. Emerging GNLP Policy 3 indicates that development proposals will be required to conserve and enhance the natural environment. Paragraph 131 of the NPPF establishes that trees make an important contribution to the character and quality of urban environments and can also help to mitigate against and adapt to climate change. It follows that opportunities should be taken to incorporate trees into developments and that existing trees should be retained where possible.

- 4.1.41 There are no Tree Preservation Orders on the site, nor is it located within a Conservation Area. An Arboriculture Impact Assessment Survey has been undertaken to inform the proposed development and accompanies the application.
- 4.1.42 The report identifies that a total of thirty-two trees and twenty-eight groups were surveyed. Eight trees and two groups were classed as Category A trees. Eight trees and four groups were classified as Category B trees. Sixteen trees and twenty-two groups were classified as Category C trees. No trees or groups of trees were categorised as Category U trees. The report confirms that the intention is to retain as many of the Category A and Category B trees as possible which are mainly located around the edges of the development parcels and the site boundaries. It will however be necessary to remove a small number of the Category A, B and C trees to facilitate parts of the development including access routes and attenuation basins. Overall, the development has sought to retain the majority of trees and groups of trees within the proposed layout. It will also include extensive tree planting within the proposed open spaces which will not only mitigate the loss of those trees which have to be removed but also significantly increase tree cover across the site, compliant with the policy requirements.

Key Issues: Health

- 4.1.43 Adopted JCS Policy 7 establishes that appropriate and accessible health facilities and services will be provided across the Local Plan area including through new or expanded primary health facilities. It indicates that health impact assessments are required for large-scale housing proposed proposals. In addition, footnote 78 of emerging GNLP Policy 2 suggests that health impact assessments should be provided for large scale developments and/or for proposals with a significant element of housing for the elderly. The application is accompanied by a Health Impact Assessment. The assessment highlights the positive impacts upon the health of future residents through the site's proximity to local facilities and services and sustainable transport links, including the proposed pedestrian and cycle routes within the site and network of open spaces. The inclusion of areas of open space coupled with the provision of 0.65ha of land for allotments and 1.61ha of land for community use are expected to generate positive health impacts. It also identifies that Harleston is served by a wide range of leisure and recreational facilities and community groups providing good opportunities for people to follow a healthy lifestyle. The NHS and Norfolk County Council will be consulted on the application make more detailed comments.

Key Issues: Noise

- 4.1.44 Adopted DMP Policy DM 3.13 relates to amenity, noise and quality of life and requires that development should ensure a reasonable standard of amenity reflecting the character of the local area. In addition, paragraph 174 of the NPPF indicates that planning decisions should contribute to and enhance the local

environment and prevent new development which may be at unacceptable risk from noise and other sources of pollution.

- 4.1.45 The application is accompanied by a Noise Assessment which concludes that the site is most significantly affected by traffic noise from the A143. The noise report concludes that in terms of the suitability of the site for residential development that the majority of the site constitutes an internal low to medium risk during the daytime period, with the highest levels experienced in the southeast corner, reducing to a medium and low risk during the night-time, with the high-risk area being a narrow area closest to the A143 in the south-east corner of the site. The assessment concludes that with appropriate distances, landscaping, ventilation and insulation measures within dwellings that there will not be a detrimental impact in line with the policy.
- 4.1.46 Furthermore, the proposals include a temporary construction access directly from the A143 for the duration of the construction of the development, thereby reducing vehicle movements to and from the site along Mendham Lane which will reduce noise and disturbance to local residents associated with the construction phase of development.

Conclusion

- 4.1.47 From the above assessment it can be seen that the principle of development on this site in the form proposed by this application is broadly consistent with the Adopted and Emerging Local Plan policies. There are some matters of detail where the input of the relevant statutory consultees will be required to confirm if the information supplied with the application is wholly acceptable e.g. highways, environment agency, NHS, Norfolk Archaeology etc.
- 4.1.48 There are one or two areas of potential conflict with the Local Plan policies where some reassessment of some of the scheme details would be of benefit particularly those relating to the design and appearance of the extra care apartment block, which has a very institutionalised demeanour. Despite a lot of work and supporting evidence which considers the character and context of the area in details the elevations of the residential dwellings still appear 'standardised' and would benefit from closer alignment with the South Norfolk Design SPD and the Redenhall with Harleston Design Guidelines and Code.

4.2 Neighbourhood Plan Policies

- 4.2.1 The Redenhall with Harleston Neighbourhood Plan has reached a relatively advanced stage. Submission of the Neighbourhood Plan to South Norfolk took place in November 2021 and the Regulation 16 Consultation is currently in progress and due to end on Friday 18th March. It is anticipated that the Neighbourhood Plan will be examined during April 2022.

- 4.2.2 The Neighbourhood Plan has been prepared by the Town Council through a bespoke Steering Group and has been the subject of extensive public consultation and community engagement since the process began in the Autumn of 2020. During the winter of 2020, stakeholder engagement was carried out via electronic meetings and telephone conversations together with a Business Survey. A Character appraisal and a data profile were also produced. A household questionnaire was sent to every household in March 2021 and 575 households responded. The pre-submission consultation held on the draft plan ran from 24th July 2021 until 10th September 2021 and was launched with a public exhibition on the 24th July at The Swan Hotel which was attended by over 100 members of the public. 71 consultation forms were received from local residents as part of the consultation and these feature in the Consultation Statement that accompanied the submitted Neighbourhood Plan. There is therefore a considerable amount of local data covering the views of local people on a range of planning policy matters.
- 4.2.3 Although the Neighbourhood Plan is not yet a 'made' Neighbourhood Plan it has been the subject of considerable public consultation and is shortly to be examined. It is therefore appropriate to view the application in the context of the Neighbourhood Plan policies. The plan is supported by specific evidence in relation to Housing Needs and Design in the form of the Housing Needs Assessment 2021 and the Design Guidelines and Code which have informed the Neighbourhood Plan Policies.
- 4.2.4 The Neighbourhood Plan does not make any site-specific housing allocations above those proposed in the emerging GNLP, which includes the application site. It does however acknowledge that the site will be developed for mixed uses and does not therefore seek to resist the principle of development on this site. Instead it has concentrated its policies on managing the impacts of new development.
- 4.2.4 The following Neighbourhood Plan policies are considered to be relevant to this application:
- Policy RWH1 Housing Mix
 - Policy RWH2 High Quality Design
 - Policy RWH5 Community Infrastructure and Growth
 - Policy RWH6 New Community infrastructure
 - Policy RWH8 New play areas, open spaces, and sports provision
 - Policy RWH12 Small scale, day to day retail in new developments
 - Policy RWH15 Traffic generation and safety
 - Policy RWH16 Pedestrian and cycle connectivity
 - Policy RWH17 Protection and enhancement of existing public rights of way
 - Policy RWH18 Parking
 - Policy RWH 19 Natural Assets
 - Policy RWH22 Climate change and flood risk
 - Policy RWH 23 Landscape buffers and pollution

4.2.5 The application has been assessed against the emerging policies as follows:

4.2.6 Policy RWH1 Housing Mix:

This policy is informed by the Housing Needs Assessment carried out in February 2021 and seeks to create a mixed and balanced community where a range of housing types are supported. Particular support is given for 1, 2 3 and 4 -bedroom properties for sale and rent including some offered as Affordable Housing for Rent within walking distance of local schools and homes suitable for older people, such as extra care housing, retirement housing, sheltered housing capable of adaptation to meet the needs of older people with disability or limited mobility, affordable housing and self-build and custom build properties. As described above the application seeks to provide 354 properties, 91 extra care apartments and 16 extra care bungalows. The types of housing include affordable and open market and range from 1-4 bedrooms with an emphasis on 2 and 3-bedroomed housing suitable for families. There is also a higher than usual level of bungalows suitable for adaption for older people as well as the high levels of extra care. The scheme also provide for 16 custom/self-build units. The application is therefore consistent with the objectives of this Neighbourhood Plan policy

4.2.7 Policy RWH2: High Quality Design

This policy is informed by the Design Guidelines and Codes which was published in July 2021. It is a bespoke document to the town, and it is disappointing that the application has not referenced it or used it more to influence the design of the scheme. The residential designs proposed in the application do not reflect in detail Redenhall with Harleston's local distinctiveness and character or seek to enhance its quality. Indeed the design of the extra care apartments building appears to have an overbearing institutionalised appearance which does not respect the form, function, and character of the area. The scheme would benefit from taking more of a lead from the Design Guidelines and Codes document. At present the designs do not appear to fully accord with the objectives of this Neighbourhood Plan policy.

4.2.8 Policy RWH5: Community Infrastructure and Growth

This policy seeks to ensure that there is sufficient community infrastructure of all types to support new development and that there are definitive plans in place to increase the capacity and provision of relevant infrastructure . The application makes provision for the usual on-site infrastructure required for the operation of the development e.g. open space, drainage, highways, affordable housing etc. However it relies on CIL contributions towards the delivery of other services such as education and health. Concerns over health and dental care were the most commonly raised by local residents throughout the various Neighbourhood Plan consultation exercises. In response to this application the NHS Norfolk and Waveney Clinical

Commissioning body has indicated that the capital cost calculations of additional healthcare services arising from the development proposal would be £673,631, but also raised concerns that although significant CIL (Community Infrastructure Levy) contributions will be delivered as part of the development, which can help mitigate the impact through upgrading existing facilities, it is not guaranteed that health will receive a CIL contribution.

4.2.9 Policy RWH6: New Community Infrastructure

The application includes 1.61ha of land available for community use. There is no specific community use assigned to it and the intention appears to be to transfer it to another body e.g. the Town Council. Policy RWH6 anticipated such a position and makes it clear that specific community consultation would need to be carried out to determine the most appropriate uses for such land. The application is however in broad conformity with the objectives of this policy.

4.2.10 Policy RWH8 New play areas, open spaces, and sports provision

The policy supports the provision of new open spaces in principle with specific support for children's play spaces, allotments, outside meeting spaces, wildlife areas and community orchards. The application proposes a number and range of space including open spaces, play areas and also includes amenity areas suitable for outdoor meeting and an area identified for allotments. The application therefore meets the objectives of the policy.

4.2.11 Policy RWH12 Small scale, day to day retail in new developments.

This policy seeks to ensure that when major new housing schemes are proposed that they also include provision for small scale retail to meet day to date needs which is accessible from all parts of the development by a range of modes of transport. The application does not specifically propose any retail however, there is an application for a new retail food-store on the adjacent site which forms part of the overall GNLP2136 allocation. The application itself is not therefore in full conformity with this policy but the applications covering the allocation site as a whole could be.

4.2.12 Policy RWH15: Traffic generation and safety

This policy seeks to ensure that opportunities for sustainable transport are maximised and that the implications of traffic generation are carefully considered and mitigated. It acknowledges that the application will generate additional traffic when constructed. Mitigatory measures are proposed to try to minimise the amount of traffic generated by construction through the temporary access route from the A143. The application is accompanied by traffic assessments and the Highways Authority will determine if these are sufficient. The application does make provision for pedestrian and cycle modes.

4.2.13 Policy RWH 16: Pedestrian and cycle connectivity

This policy seek to ensure that new developments are well connected to services and facilities in the town and make appropriate safe provision for pedestrians and cyclists . The application does provide new routes and connections both inside the site but also between the site and surrounding development and onwards to the town centre and other facilities. The application is therefore consistent with the policy.

4.2.14 Policy RWH17: Protection and enhancement of existing Public Rights of Way

This policy seeks to ensure that existing public rights of way are not adversely affected by development proposals and secure enhancements to them. There is only 1 existing public right of way (FP18) that is affected by the scheme. It currently acts as the access to the farm and the farm buildings however the demolition of the farm buildings and the fact that the farmhouse will be accessed via the estate roads means that route can be retained and enhanced.

4.2.15 Policy RWH 18: Parking

This policy seeks to ensure that parking is provided on new developments in accordance with the adopted standards of Norfolk County Council and are designed taking into account the guidance in the Design Code. The application proposes a level of parking consistent with the adopted highways standards and also includes provision for visitor parking. It is unclear if the design of parking has taken into account the guidance in the design code in respect of the design of the parking. However the overall quantum of parking does appear to be consistent with the requirements of the policy.

4.2.16 Policy RWH21: Natural Assets

This policy seeks to ensure the protection of natural assets on development sites e.g. trees, ponds ,hedgerow etc and encourages the restoration of fragmented habitats and net gains for biodiversity. The application is supported by detailed ecological assessments and seeks to retain a significant numbers of the trees on site together with the provision of additional tree planting. The application is therefore consistent with the objective of this policy.

4.2.17 Climate Change and Flood risk

The policy seeks to direct development away from a areas that would increase the risk of flooding. It identifies a number of areas known locally to flood. One area is in Jay's Green which is in relatively close proximity to this application site. The application is accompanied by detail flood and water management information and the layout provides for two flood attenuation basins in the northeast and northwest of the site which are the areas closest to those known to flood. The technical consultees will demine if this information is wholly sufficient however it is clear that attempts have been made to satisfy this policy.

4.2.18 Policy RWH23: Landscaping buffer and pollution

This policy seeks to protect the amenity of residents from the impacts of the A143 in terms of noise and air pollution. It specifically requires consideration of the development close to the A143 to provide substantial green buffers and tree planting between any proposed residential development and the A143. The application proposes the area of land for community use and substantial areas of open space to the east of the site closest to the A143. The main residential areas are located to the west of the site adjacent to existing development. The application also proposes new landscaping along the eastern edge of the site adjacent to the A143. The application is therefore in accordance with the objectives of this policy.

Conclusion

4.2.19 From the above assessment it can be concluded that the form of development on this site as proposed is broadly in conformity with the emerging Neighbourhood Plan policies. The Neighbourhood Plan policies were drafted with the prospect of this specific application in mind and therefore many of the policies contain specific guidance that is applicable e.g. RWH23 in respect of the landscape buffer and RWH6 in respect of the land available for community use.

Section 5: Other responses

- 5.1 At the time of writing a number of other responses to the application have been made by both statutory consultees and by local people.
- 5.2 The main concerns raised by local residents are as follows:
- Concerns over the principle of new housing development in the town
 - Concerns over increased traffic in and around the site both as a result of construction but also once the development is occupied
 - Concerns over traffic at peak times on Mendham Lane and Jay's Green
 - Concerns over impacts on services in the town such as health (GP/Surgery), dentists and education facilities
 - Impact on health services particularly from the extra care elements
 - Concerns over visual impact and loss of countryside
 - Concerns over pollution
 - Concerns over increased flood risk and impact on Starston Beck

Section 6: Considerations for Redenhall with Harleston Town

- 5.1 Redenhall with Harleston Town Council are advised to consider the following when formulating their formal response to the application.

1.

2. Principle of development:

This is accepted by both the adopted and emerging planning policies including the Neighbourhood Plan. Furthermore there is a specific allocation for the site contained within the emerging GNLP as Policy GNLP2136. There are some concerns about development in general from local people, but these are largely focussed on matters of impact and detail.

The Town Council is not advised to raise objection to the principle of development on this site.

3. Access and traffic generation

The application is accompanied by a number of transport and access assessments. The road layout provides for two vehicular accesses thereby providing mitigatory routes for residents and emergency vehicles should either route be blocked by virtue of an accident.

The Town Council is advised to support this part of the proposal

The proposal includes a temporary construction access from the A143 which will provide some relief for properties on Mendham Lane during the construction period.

The Town Council is advised to support this measure on the basis that it will provide some relief to residents on Mendham Lane during the construction phase.

The layout includes a number of pedestrian and cycle routes both within the site itself and providing connections to existing adjacent residential developments and the rest of the town and the town centre.

The Town Council is advised to support the provision of pedestrian and cycle connections both within the development and between the development and the rest of the town.

The application provides for a level of off-street parking compliant with adopted standards and makes provision for visitor parking.

The Town Council is advised to support the provision of off street and visitor parking.

3. Housing Mix

The mix of housing proposed provides over and above the required minimum for affordable housing and provides a range of housing sizes to meet local needs. The provision of open market and affordable family housing 2-3 bedrooms is consistent with the need identified in the Housing Needs Study that accompanies the Neighbourhood Plan. **This should be supported.**

The application provides for a significant proportion of bungalows – suitable for older people or for those with impaired mobility. **This is consistent with the Neighbourhood Plan Policy RWH1 on Housing Mix and should be supported.**

The proposal provides for a high level of special needs housing in the form of extra care apartments and bungalows, and this is consistent with Neighbourhood Plan Policy RWH1 relating to Housing Mix. **The principle of the provision of this form of housing should be supported in principle**

4. Health Contributions

The impact of the development on local health provision is of concern to local people. The provision of a high level of extra care accommodation in one location may also have additional impacts on those services as the occupiers of the extra care accommodation are more likely to have a regular need for health care than other occupiers. The NHS consultee has calculated that the capital costs alone of providing the commensurate health care generated by the development is £673, 631. In addition concerns have been raised that there is no guarantee that health care will receive appropriate CIL contributions. **Given the high priority that local residents have given to health care concerns both as a consequence of this application but during the Neighbourhood Plan process more generally the Town Council therefore is advised to request in its response that high priority and necessary CIL funding should be given to ensuring that sufficient health care provision is made in the town to accommodate this development, which is consistent with Neighbourhood Plan Policy RWH5.**

5. Design and Layout

The proposed layout of the scheme makes provision for a range of green areas which make a positive contribution to the appearance and setting of the development. A range of spaces are provided including appropriate areas of open space together with formal play areas and informal amenity areas which provide space for residents to enjoy the outdoors but also provide for wildlife, communal gathering and generally add interest to the area. Provision is also made for allotments and an area of community land. There are significant areas of landscaping proposed between the development and the A143 and also reinforced landscaping between proposed and existing residential development. There is also the provision of more formal landscaping around the extra care apartment block. **This general provision of green spaces and landscaping should be supported.**

However the design of the residential elements and the extra care provision has not taken into account the guidance set out in the Design Guidance and Codes or sufficiently the guidance in South Norfolk's Design SPD. The residential designs appear to be standard designs which could be found anywhere and lack the local distinctiveness of the parish with some elevations lacking interest. Small details such as those for windows and doors and brick patterns of elevations would improve the designs. Furthermore the design of the extra care apartments gives the impression of an institutional or municipal building rather than a collection of individual homes. Its current proposed appearance has the potential to be overbearing at this important entrance to the site from the south. The current proposed designs would not meet the objectives of Adopted DMP Policy 3.8 or Neighbourhood Plan Policy RWH2.

The Town Council is advised to request that further consideration be given to the residential and extra care building designs, specifically the elevations in the context of the two pieces of specific design guidance available.

6. **Land for Community Use**

The application provides for 1.61ha of land for community use. There is no specific community use assigned to the land and it is inferred that it will be transferred in due course to another body.

The Town Council has made it clear through Policy RWH6 that public consultation should be carried out with community to determine the specific use for any potential new community land or buildings. **The provision of land for community use is welcomed and the Town Council therefore is advised to begin to think about how they would wish this consultation to be undertaken and also its timing.**

7. **Amenity/landscape buffers.**

The provision of significant areas of open space, landscaping, and public access at the eastern end of the site adjacent to the A143 is consistent with the requirements of Neighbourhood Plan Policy RWH23.

This should be welcomed.

8. **Floodrisk**

The application is supported by information pertaining to flood risk and water management. The appropriate statutory consultees will determine the efficacy this information. However the potential for this development to increase flooding elsewhere in the town has been raised by local residents. The scheme provides for at least 4 new attenuation basins. Two of which are to the north of the site. Policy RWH22 of the Neighbourhood Plan identifies a number of areas of localised flooding. Two of these – Lovat Close and Jay's Green are in close proximity to the north of the application site. The areas of localised flooding have been developed via public consultation and through the input of local people who have experienced issue of surface water run-off.

Given the concerns raised by the community and the objections from the Local Lead Flood Agency, the Town Council is advised to reinforce in its response to this application that this development should not exacerbate existing surface or foul water drainage problems or cause new ones within the town.