

**Advice for Redenhall with Harleston Town Council in respect of
Planning application 2023/1418 – Land north of Spirketts Lane**

September 2023

Compass Point Planning & Rural Consultants

email: andrea@compasspoint-planning.co.uk

Redenhall with Harleston Town Council has commissioned Compasspoint Planning and Rural Consultants to assist with the response to planning application reference 2023/1418 specifically :

1. Review of application documentation
2. Appraisal and review of feedback from local community/Town Councillors (from public meeting,)
3. Preparation of formal response for Town Council to consider.

Executive Summary

This purpose of this report is to aid Redenhall with Harleston Town Council in formulating its formal response to consultation on Planning Application No : 2023/1418 – Land north of Spirketts Lane.

The application seeks full planning permission for 91 dwellings (amended to 89), associated landscaping and external works on land north of Spirketts Lane. The applicants are Cripps Development Ltd who are represented by agents Chaplin Farrant. The application is made for full planning permission.

Response to the application

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

Principle of development:

No comment as this has been established through the adopted Strategic Policies

Accessibility and traffic generation

Notwithstanding the above in connection with the principle of development, the Town Council raises concerns at the potential increase in traffic that will be generated by this development and specifically the impact this will have on the Spirketts Lane/Shotford Road junction. The potential for conflict between industrial and residential traffic using Spirketts Lane should be mitigated through traffic calming measures on Spirketts Lane and for industrial traffic to be routed to use alternative routes.

The Town Council raises concerns in respect of the limited provision of pedestrian and cycle connections both within the development and between the development and the rest of the town and requests that consideration be given to a meaningful pedestrian and cycle link between the development and the rest of the town including Lidl at Mendham Lane.

Housing Mix

This is supported.

Health and other CIL Contributions

The Town Council requests that high priority and necessary CIL funding should be given to ensuring that sufficient health care provision (including dental provision) is made in the town to accommodate this development

Design and Layout

The residential designs appear to lack some elements of distinctiveness and could have made better use of materials as advocated in the Design Guidance and Codes. Consideration to the layout of the dwellings to create individual character areas or grouping around a green could also have acted to provide a better rural transition for the site's appearance. The lack of new tree provision including Street Trees is disappointing and an opportunity has been missed to provide a more attractive, green, rural and less urban visual appearance to the development. The Town Council requests that further consideration be given to the residential designs, in the context of the two pieces of specific design guidance available.

Open Space

The Town Council raises concerns in respect to the lack of open space provided on site, furthermore that those spaces appear to have other purposes than just open space and to ask for clarity where the off-site contributions will be directed to.

Floodrisk

Given the concerns raised by the community, the Town Council is firmly of the view that this development should not exacerbate existing surface or foul water drainage problems or cause new ones within the town.

Biodiversity/Ecology/Trees

The Town Council raises concerns in respect to the lack of biodiversity net gain proposed by this application and request that further consideration be given to the provision of ecological enhancement, the provision of street trees and specific benefits for wildlife on site.

Section 1: Application Details and Description

- 1.1 The application originally comprised 91 dwellings, later reduced to 89, with associated landscaping and external works on land north of Spirketts Lane. The applicants are Cripps Development Ltd represented by Chaplin Farrant. The application is submitted in full.
- 1.2 The site extend to 3.19 hectares and is located to the south-west of the town centre. The current use of the site is agricultural (the land is Grade 3). Immediately to the east of the site there are commercial buildings. To the south of the site is Spirketts Lane with agricultural field beyond and residential dwellings are to the north and west. The site is located in relatively close proximity to a range of services and facilities.
- 1.3 The site is located entirely within Flood Zone 1 and is therefore at a low risk of fluvial or tidal flooding. The site gradually slopes from the southeast corner to the north-west with a fall of 7m.
- 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. There are no Tree Preservation Orders on the site although there is a mature hedgerow with trees that runs north south through the centre of the site and a further hedgerow along the eastern boundary. The site is not located within Harleston Conservation Area, the closest point of which is approximately 100m to the north of the site. There are no listed buildings or identified non-designated heritage assets within close proximity.
- 1.5 Pre-application advice was sought from the District Council in June 2022 on the scheme for 91 dwellings. The advice given included the following issues that any subsequent application would need to address:
 1. Provide new and/or improved pedestrian and cycleway links to the town centre, Fuller Road Industrial Estate and allocated employment site HAR 6 and improve links to HAR7;
 2. Provide highways access via both Willow Walk and Spirketts Lane;
 3. Provide adequate and appropriate buffering / screening along the south-eastern part of the site bordering the existing lorry park (allocation HAR 6) to mitigate potential noise and lighting impacts on residential areas;
 4. Contribute towards green infrastructure protection or enhancement along the Waveney Valley corridor;
 5. Implement a suitable drainage strategy (SuDS where practicable);

¹ Site of Special Scientific Interest – national nature conservation designation

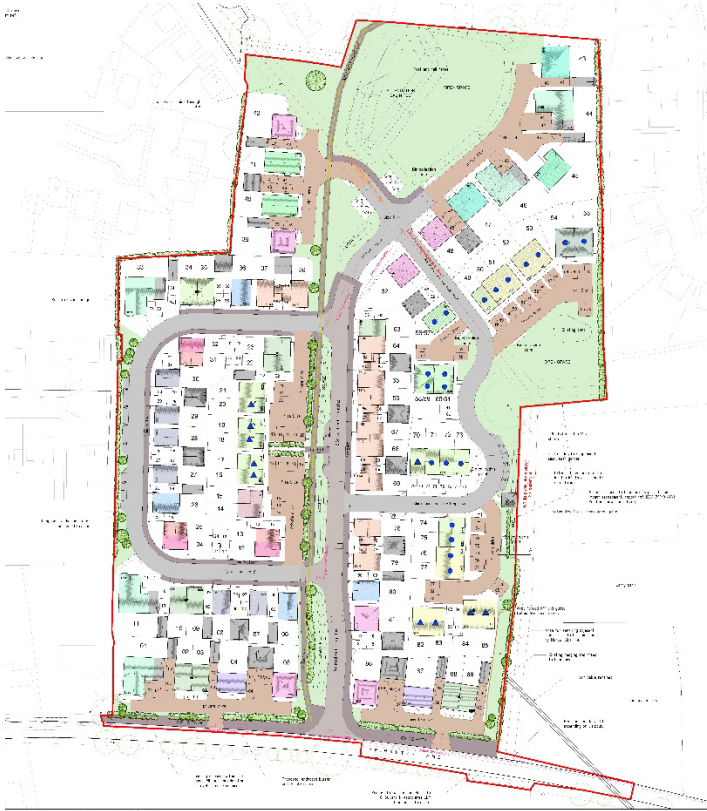
6. Wastewater infrastructure capacity must be confirmed prior to development taking place.

- 1.8 Access to the site is proposed from Spirketts Lane and the proposed development seeks to create a main access road off Spirketts Lane and then type 6 shared surfaces from the Type 3 main access road. Shared surfaces and pedestrian links have been placed strategically around the site to encourage an active lifestyle, to provide connectivity to the existing residential to the north and west and reduce the need for vehicles.
- 1.9 The residential units will be a mixture of flats, houses and bungalows. 20 affordable units for rent are proposed together with 10 shared ownership units and 59 open market units, ranging from 1 bedroom to 4 bedrooms. All affordable units are houses whereas there are some open market bungalows.

Original Proposed Site Layout Plan



Revised Site Layout Plan (September 2023)



Section 2: Community Engagement

- 2.1 As expected for a scheme of this size, the application has been the subject of pre-application public consultation, this was held in August 2022 at the Shotford Bowls Club on Spirketts Lane. The applicant's supporting information indicated 56 people visited the event and their comments are outlined in the Design and Access Statement.
- 2.2 The key issues raised were as follows:
- Concerns over the cumulative traffic impacts of this scheme and the Briars Farm scheme on Mendham Lane
 - The scheme could contain more bungalows (the submitted scheme only contains 2)
 - Footpath and cycle connections from the site should link with those in Mendham Lane
 - Concerns over the potential for future access through the adjacent industrial estate causing a rat-run
 - Landscaping and boundary treatments between the site and existing residential dwellings should be significantly reinforced but soft
 - Concerns over the general disruption to the town generated by the construction of the scheme and the cumulative effects of other schemes
 - Boundary between the site and Oak Tree Way should ensure that no amenity issues noise, dust etc from new residents
 - Existing green features e.g. ponds on site should be retained
 - Spirketts Lane requires traffic calming measures
 - There should be a continuous footway connection between the site along Spirketts Lane to the new Lidl at Briar Farm.
 - Proposed streetlights should match those used by the Town Council
 - Concerns at infrastructure provision e.g. demand for doctors, schooling, water and sewage treatment, and plans should be made to expand the capacity for these accordingly in advance of residents moving in, not after. There is already excess demand for primary school places and the entry classes at the secondary school, and the doctor's surgery are stretched. This is vital for residents' quality of life.
 - Retain the trees along Angles Way
 - Concerns about overlooking into properties on Pine Close
 - Concerns that the height of buildings on the site will interfere with the efficiency of solar panels on properties at Lime Close.

Town Council Meeting 27th July 2023

- 2.3 In order to assist with its response to the application, the Town Council held a public meeting on the 27th of July 2023 at the Sports and Leisure Centre to allow for

Councillors and members of the public to express their views on the application. Approximately 27 members of the public attended the meeting together with Town and District Councillors. The key issues raised at the meeting were as follows:

Traffic/Highway Issues

- More traffic will be created in Harleston and (with the addition of a supermarket) it is going to put a lot of pressure on the junction.
- NCC should be pressed to investigate the need for a roundabout to alleviate the pressure.
- The traffic is busy all day long.
- A statement states its within max capacity for highways, but they haven't taken into account the other developments which include Lidl and Briar Farm which are happening at the same time, and this should be examined for capacity as a collective.
- Pavements should be extended into Mendham Lane
- Vehicles take up most of the road already.
- A pedestrian island will not be suitable for this area due to the size of the vehicles and the roads.
- Bar the lorries from Spirketts Lane and redirect them to use the A143.
- Residents on the corner of Spirketts lane and Shotford Road.
- Concerns have been raised to Gary Overland the NCC Highways engineer about the volume and size of lorries which are cutting across the pavement and verge.
- This road cannot sustain the agricultural vehicles, HGV's, cars, combine harvesters etc,
- Health and Safety should be a priority for pedestrians.
- No accidents in the area for 5 years statement, not a relevant statement
- Tyre marks are 7-8 ft in from the road and crossing the pavements.
- No plans for the HGV's
- Access route was to be through Willow Walk but plans were abandoned, suggestion to put it on Spirketts Lane, Police vetoed the plans and again in 2002,
- Has anyone approached the Police? The Police need to intervene.
- Mendham Lane traffic is a terrible with heavy HGV's using it all the time.

Infrastructure

- Lack of energy supplies which need to be guaranteed for the future.
- Lack of infrastructure
- School places/Dr's places/Dentist places
- Infrastructure must match the growth.
- All concerns must be addressed.

- Dr Surgery had a 57% customer satisfaction review, appeal to the Town Council to bring together the action that gets the services where they need to be.
- Concerns relating to Infrastructure and the lack of any solar panels.
- Who is responsible for the infrastructure for the development?
- Important it is planned for before the building starts.
- There is a policy about community infrastructure which states it must be planned for in advance.
- All the developments together are creating approx. 800 houses which is approx. 3000 people – the town does not need any more houses.
- The infrastructure cannot cope with this influx.
- Can't get a dentist now travels to Bury.
- The schools are at capacity.
- CIL money is worked out by formulae.
- It has assumptions about how many children will be in in each household this then determines how many school places are needed.
- We have ammunition as the community infrastructure should be planned in advance so we can go to SNDC to ask the questions about what is needed.
- Money is available so we can ask for the plan for the Dr's surgery and the schools etc

Drainage/Sewerage

- Need for adequate drainage.
- Need for adequate sewerage.
- Anglian Water has raised concerns about flood risks.
- NC want to add a lake where it floods every winter, where is all the water going to go, the stream was diverted in 1997.
- Concerns about flooding and drainage
- Surface water can't drain away on Lime Close.
- Surface drainage sewerage and water supply.
- Current water pressure is poor and that they have already flooded.

Design

- Important there is variety in the designs.
- SNDC said they would only build bungalows, but they are adding a 4-bedroom houses.
- The development backs onto his house - His solar panels will not work.

Climate Change/Environmental Issues

- Encourage the developers to think about sustainability and climate change.
- Briar Farm is building to present regulations, but the developers must future proof buildings with regards to insulation and energy

- Policies in the Neighbourhood Plan that provide a framework about sustainability.
- Electric charging points; solar panels; energy storage equipment; ground source heat pumps; rainwater harvesting, rainwater recycling, low energy lighting; passive ventilation, thermal mass use of solids to retain heat, onsite energy generation; movement activated streetlights
- Sewerage works overflow, has no phosphate stripping on
- Anglian Water have not provided enough answers.
- Street lighting concerns
- Developers are suggesting no lights.
- New sites should have LED lights which are angled downwards for safety, and this should not be classed as light pollution.
- Concerns about the ancient hedging, is it being ripped out? It's been there over 100 years; these questions need addressing.

General Comments

- The Briar Farm development is like Spirketts Lane North
- Will this development ever take place - similar meeting about an estate near to the old railway station - not a brick has been laid yet.
- No more development after Briar Farm.
- CIL money is not allowed to be used on Dr's etc, so what is being done and where are the plans about all the infrastructure requirements.
- Was interviewed by Radio Norfolk, and District Councillor Lisa Neal was asked twice about CIL money. It was reported by Cllr Neal that it goes into a central pot and that Harleston had already had 1 million for the Town Improvement Scheme there would be no other available money.

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 with consultation on proposed modifications expected soon. In addition the Redenhall with Harleston Neighbourhood Plan was 'made' in October 2022 and has full weight as part of the development plan.

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

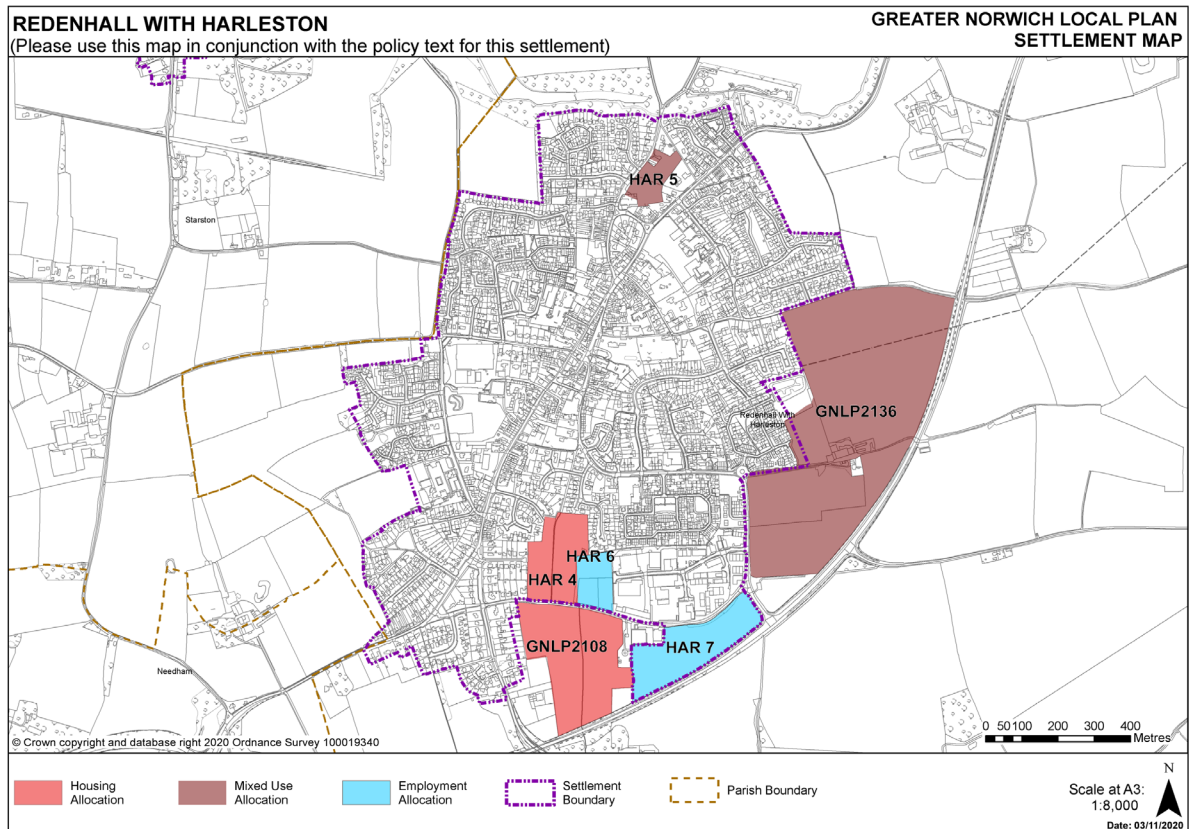
4.1 Adopted and Emerging Local Policy:

- 4.1.1 The site is identified in the Adopted Development Plan as an allocation for housing of 95 dwellings.
- 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 the application site as mentioned above is identified in the Adopted Local Plan for development and the principle of development here is therefore established and not reasonably challengeable .
- 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. This application site is accounted for in the 800 new dwellings as HAR4 (See GNLP Map below)



Extract from the Regulation 19 Version of the GNLP 2021.

Conformity with Site Specific Allocation

- 4.1.8 The application site is specifically identified for development through Policy HAR4 of the Adopted Local Plan and this allocation is to be rolled forward in the emerging Plan which provides the detail of the form of development expected. The policy states:

POLICY HAR 4 Land at Spirketts Lane, Harleston (approx. 3.19 ha) is allocated for residential development. This will accommodate approximately 95 homes. More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints.

The development will be expected to address the following specific matters:

- Provide new and/or improved pedestrian and cycleway links to the town centre, Fuller Road Industrial Estate and other allocated employment sites;*
- Provide highways access via both Willow Walk and Spirketts Lane;*
- Provide appropriate screening along the south-eastern part of the site bordering the existing lorry park to mitigate potential impacts on residential areas;*
- Contribute towards green infrastructure protection or enhancement along the Waveney valley corridor;*
- Implement a suitable drainage strategy where practicable;*
- Wastewater infrastructure capacity must be confirmed prior to development taking place.*

- 4.1.9 The application as amended proposes 89 dwellings with associated infrastructure and this is broadly in conformity with the allocation policy.

- 4.1.10 The application also provides for 2 areas of public open space one of which contains an attenuation basin. This is an under-provision of open space when matched against the guidance in South Norfolk's Open Space Supplementary Planning Documents (SPD).

- 4.1.11 The strategic policies for the site as set out above require a number of key matters to be provided or addressed. These are:

- **Pedestrian and cycle links:** The proposed layout provides a cyclepath at the main access however, this only extends across the site frontage along Spirketts Lane, and does not link into any other connection that would provide a meaningful route. To the west of the site is existing residential development with relatively narrow pavement frontage that is not currently suitable or safe for cyclists and to the east is the industrial estate which currently has no footpath and is characterised by a green verge and hedging. Whilst a cyclepath is provided along the confines of the application site boundary in practice it makes no meaningful connections that would fulfil this policy requirement without additional connections to be provided. The site does also provide a 2m wide north-south footpath internal to the site which has the potential to link with an existing footpath to the north which connects with the existing development to

the north and onto Mendham Road which could provide a pedestrian route to the town centre. The scheme as proposed does make some provision here however the strategic planning policy intention to provide a more joined up pedestrian and cycle route to link development and the town centre is not achieved.

- **Provide highway access via Willow Walk and Spirketts Lane.** The proposed and amended layouts only include a single point of vehicular access of Spirketts Lane – there is no vehicular access from Willow Walk. The original scheme did include the potential for a footpath link to Willow Walk but the amended plan has removed this. The site's connections with the surrounding development are essentially only via the Spirketts Lane access and the footpath that connects with the Woodlands development to the north. There are no east or west footpath or cycle connections between the site and the surrounding development. The proposed layout does not achieve this strategic aim fully.
- **Provide appropriate screening along the south-eastern part of the site bordering the existing lorry park .** The scheme proposes acoustic fencing along the eastern boundary together with a landscape buffer along the boundary. In addition, proposed dwellings in the south-eastern portion of the site have been set well back from the site boundary with areas of road and car parking and landscaping providing intervening features between the proposed dwellings and the adjacent lorry park to the east. Whilst the proposed scheme does seek to ensure minimum conflict between proposed dwellings and the adjacent lorry park, the landscaping at the south-eastern boundary could be strengthened which in turn would provide a better gain for biodiversity.
- **Contribute to green infrastructure protection or enhancement along the Waveney Valley Corridor.** The proposed layout makes provision for green areas within the site and landscaped areas along the main boundaries although along the site frontage these are punctuated by the main access to the site and two further entrances to provide access to private drives. The eastern boundary also does not contain a continuous green cover and there could be opportunities to provide some better ecological enhancement here on site.
- **Sustainable drainage strategy:** The proposed layout includes provision of an attenuation basin and a number of swales.
- **Wastewater infrastructure capacity to be confirmed :** The application is supported by a drainage strategy and Anglian Water have confirmed in their consultation response that wastewater and sewerage capacity exists. The scheme complies with this requirement.

4.1.12 Whilst meeting a number of the strategic policy requirements , the scheme as currently proposed does not deliver all – principally the footpath and cycle connections and it would also benefit from some enhancement to the landscaping and biodiversity on the south eastern and eastern boundaries before being wholly compliant.

Section 5: Key Issues measured against adopted development management policies

Key Issues: Accessibility and connections, traffic generation and highway safety

- 5.1 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.
- 5.2 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.
- 5.3 The proposal includes a single point of access to the majority of the development (there are two smaller private drive accesses on the site frontage. NCC Highways have raised some concerns about this in terms of congestion should an accident occur and the site layout has been amended to include a better road looped system internally within the site although NCC comments on the amended scheme are still awaited. NCC have also referred to the need for a pedestrian refuge in Spirketts Lane and also some concerns about the proposed cycleway which now is proposed across the site frontage. It does not however currently link onto any meaningful onwards route and although the scope to do this may lie outside of the applicant's immediate control there should be an opportunity taken by SNDC and NCC working with the applicant to create a meaningful cycle and pedestrian route from the site to connect with the town and with the adjacent industrial areas as envisaged by the adopted strategic policy.
- 5.4 There is a Transport Assessment accompanying the application. Traffic generation is one of the main issues raised by the local community in respect of this development and therefore it is important that this is properly scrutinised by the highway authority.
- 5.5 The overall site layout will contribute to 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, although it is noted that the precise link with existing footpaths is required by NCC.

Key Issues: Infrastructure, including education, health and dentist provision

5.6 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 not accompanied by a Health Impact Assessment.

5.7 Norfolk and Waveney Integrated Care System have commented on the application and set out the need for the following contribution (based on the original 91 dwellings):

- Primary & Community Healthcare Provision Total Primary & Community Care Capital Cost £143,840
- Acute Provision Acute Care Capital Cost £177,728
- Mental Healthcare Provision Mental Health capital Cost £161,05
- Intermediate Healthcare Provision Intermediate Capital Cost £4,85

The ICS Strategic Estates Workstream calculates the total level of contributions required, in this instance to be **£487,476**, split across all health sectors.

5.8 However, this does not include any contributions to dentist provision, something that has long been a concern in the town, often raised through Neighbourhood Plan consultations and raised more recently by local residents at the consultation meeting held in July. The difficulties arise over the way that dentist services are provided – increasingly through private enterprise and more generally which makes this a worsening problem on a national scale .

5.9 **Education:** NCC have indicated there is some capacity within the current schools in the town and have sought mitigation required for 7 Early Education places, 24 Primary School places, 12 High School places and pro-rata SEND contribution. In addition, library contributions are required at the library to develop self-service system for local area.

Key Issues: Design and Layout

5.10 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.

- 5.11 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.
- 5.12 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.
- 5.13 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.
- 5.14 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. Concerns raised by local residents who live adjacent to the site have included problems of privacy and overlooking, and the potential for interfering with the efficiency of adjacent solar panels. The amended plan has replaced some of those dwellings located close to the eastern boundary, with bungalows.

Key Issues: Housing Mix and Affordable Housing Compliant

- 5.15 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.
- 5.16 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.

- 5.17 The proposal seeks to provide 30 affordable units of the overall proposed 89. These include first homes, rented housing and shared ownership which is a mix that satisfies the existing policy and the SNDC Housing team. The range of size of dwelling also provides a good mix catering for the needs of older residents and those with younger families. Therefore the application is considered to be compliant with the relevant policies on this subject.

Key Issues: Heritage & Archaeology

- 5.18 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 Archaeology Report. which indicates that the site does not contain any designated heritage assets, it is outside of the Conservation Area and there are no listed buildings in close proximity.

Key Issues: Landscape

- 5.19 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 GNLP requires development proposals to conserve and enhance the natural environment.
- 5.20 The application is not accompanied by a landscape impact assessment; however, the site is relatively self-contained within the wider setting of the town and is located between existing development and the lorry park/industrial estate. It does not extend development into open countryside.

Key Issues: Open Space

- 5.21 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. As mentioned above, the recreational open space provision proposed by the scheme comprises an under-provision on site although off-site open space contributions are indicated. It is unclear where these contributions will be directed and it is noted that the two main open spaces proposed on site have dual functions –

one hosts the attenuation basin and the other is used as a noise buffer between proposed dwellings and the adjacent lorry park.

Key Issues: Drainage and Flood Risk

- 5.22 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 HAR4.
- 5.23 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 local residents that development of the site may further exacerbate existing problems of flooding caused by surface water in Lime Close. Several swales and an attenuation basin located towards the north of the site, nearest to existing development is proposed in the layout. Norfolk County Council as Local Lead Flood Agency are yet to comment on the amended layout.

Key Issues: Ecology

- 5.24 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.
- 5.25 The application is accompanied by an ecological assessment produced by Norfolk Wildlife Trust. There are no formal nature conservation designations on the site and protected species surveys have been carried out. Whilst the report assesses the impacts of the development on the ecology of the area it is unclear how the requirement for 10% Biodiversity Net Gain is to be met by this development

Key Issues: Trees

- 5.26 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.

- 5.27 There are trees on site and there is one significant tree located to the south and east of the site which is proposed to be retained and incorporated into an area of open space. Aside from the site boundaries there are some trees proposed within the site which largely follow the route of the footpath and the swales, however given the emphasis that the NPPF places on ‘*Street Trees*’ the level of tree cover within the scheme is relatively low. An Arboriculture Impact Assessment Survey and hedgerow survey have been undertaken to inform the proposed development and accompanies the application. South Norfolk’s Ecology and Tree Officer has asked for additional details

Key Issues: Noise

- 5.28 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.
- 5.29 The application is accompanied by a Noise Impact Assessment which takes into account Road Traffic Noise and potential noise from the adjacent Fullers Road Lorry Park and considers the policy requirement in Policy HAR4, which requires appropriate screening between the site and the lorry park. The proposal includes the provision of a 3m high acoustic fence in addition to the existing palisade fencing, ditch and hedging to create such a barrier. At the time of writing the South Norfolk Environmental Health Team have lodged a holding objection whilst the report’s conclusions are revised to take into account the revised layout.

Conclusion

- 5.30 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 a number of 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, trees, biodiversity and noise issues.

Section 6: Neighbourhood Plan Policies

- 6.1 The Redenhall with Harleston Neighbourhood Plan was made in October 2022 and therefore is ascribed maximum weight in the determination of this application.
- 6.2 The Neighbourhood Plan has been prepared by the Town Council through a bespoke Steering Group and was the subject of extensive public consultation and community engagement throughout its preparation. 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 of 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.
- 6.3 The Neighbourhood 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.
- 6.4 The Neighbourhood Plan does not make any site-specific housing allocations above those proposed in the emerging GNLP, which includes the application site. Instead it has concentrated its policies on managing the impacts of new development.
- 6.5 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 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 21 Natural Assets
 - Policy RWH22 Climate change and flood risk
 - Policy RWH23 Landscape Buffers and pollution
- 6.6 The application has been assessed against the emerging policies as follows:

6.7 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 89 properties. This includes 30 affordable dwellings which are a mix of rented accommodation, shared ownership and First Homes. The size of properties range from 1-4 bedrooms with an emphasis on 2 and 3-bedroomed housing suitable for families. There is also provision for some affordable flats and open market bungalows. The housing mix proposed by the application is therefore consistent with this Neighbourhood Plan policy

6.8 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 made little reference to 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. The scheme would benefit from taking more of a lead from the Design Guidelines and Codes document specifically in terms of:

- The site is located within Character Area 3 : Mendham Lane and Spirketts Lane, the materials in this area include pantile roofs, red and yellow bricks with pitched and hipped roofs.
- taking the opportunity to create distinct areas of character within the site layout e.g. using the open spaces to create a village green effect which would help to reduce a too urban feel.
- At present the layout does not include many new 'street trees' which is a key requirement of the NPPF (para 131) designs do not appear to fully accord with the objectives of this Neighbourhood Plan policy.
- Parking areas could be better visually broken up through the use of trees and landscaping
- Inclusion of sustainability measures e.g. there appears to be no electric charging point shown, or water efficiency measures.

6.9 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 £143,840. In responding to previous applications in the town, the NHS has 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. In addition, local concerns over dentist provision in the town are not addressed at all.

6.10 Policy RWH6: New Community Infrastructure

The application makes provision for open space but does not include any other new community infrastructure on site although CIL contributions to health, education and libraries are identified. The application is therefore in broad conformity with the objectives of this policy.

6.11 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 Open Space requirement for 91 Dwellings is 10657sqm. The scheme provides in the region of less than half of that figure on site as direct provision and proposes an offsite contribution. It is unclear where this offsite provision will be directed to. The main proposed on-site open spaces are proposed to the south-east of the site (to provide a buffer with the adjacent lorry park) and to the north of the site – where it can be accessed by residents from existing development. The northern open space also hosts the attenuation basin and therefore this reduces the amount of useable open space available to the development, which is already in shortfall. The open space provided appears to be informal rather than providing specific forms of space required by the policy such as children's play areas. Given that the amount of open space being provided is less than that required by adopted policies and that this is disappointingly further reduced through the location of the attenuation basin. More detailed consideration of the practical use of the open space provided should have been given to the fact that the site is located in a transitional location between urban and rural where well designed, sized and located open spaces could have created a better assimilation of the scheme into the character of the area.

6.12 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 maximise pedestrian safety through the proviso of the pedestrian crossing refuge on Spirketts Lane, although the Highway Authority has some concerns over location and design. The application is accompanied by traffic assessments and the Highways Authority will determine if these are sufficient. The application does make some limited provision for pedestrian and cycle modes.

6.13 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 propose a new cycle route across the entire site frontage, in an attempt to accord with the requirements of the strategic policy. However the route does not connect into any other existing cycle routes either to the east or to the west and therefore no meaningful route is provided. There should be an opportunity taken by SNDC and NCC working with the applicant to create a meaningful cycle and pedestrian route from the site to connect with the town and with the adjacent industrial areas as envisaged by the adopted strategic policy. A north-south footpath is provided within the site which has the potential to connect with existing routes to the north and provide good access to the town centre, however there are no east-west connections proposed which would link the site with adjacent developments and this is a regretted missed opportunity.

6.14 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 (FP25) that is affected by the scheme and it is proposed to retain it in its current location.

6.15 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.

6.16 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 an ecological assessments which concentrates on the impacts of the proposed development. It is unclear from the supporting information provided how the required biodiversity net gain is to be achieved (currently 10%). Furthermore it is unclear what ecological enhancement measures such as the creation of new habitats, restoration or repairing of existing fragmented biodiversity networks or creation of new wildlife corridors as required by this policy are proposed. The application as currently proposed does not appear to meet the requirements of this policy.

6.17 Policy RWH22: Climate Change and Flood risk

The policy seeks to direct development away from areas that would increase the risk of flooding. It identifies a number of areas known locally to flood. None of these areas are in close proximity to this application site. However concerns over flooding particularly surface water flooding have been raised by local residents. The application is accompanied by detail flood and water management information and the layout provides for a flood attenuation basins in the north of the site which is in the area known to flood. The technical consultees will determine if this information is wholly sufficient however it is clear that attempts have been made to satisfy this policy. The policy also covers climate change and sustainability, from the plans provided there appears to be little provision for sustainability measures such as electric charging, water or energy efficiency.

6.18 Policy RWH23: Landscaping buffer and pollution

This policy seeks to protect the amenity of residents from the impacts of development in terms of noise and air pollution. The strategic policy which allocates the site identifies the need for noise mitigation in the south-east of the site which has been addressed by the application in the form of an acoustic fence. Properties have largely been set back away from the boundary with the lorry park and an area of open space has been so located to act as a further green buffer. The application also proposes new landscaping along the eastern edge of the site.

Conclusion

- 6.19 From the above assessment it can be concluded that the form of development on this site as proposed is broadly in conformity with a number of the adopted Neighbourhood Plan policies. However it does have areas of conflict with others, most notably RWH16 in relation to cycle connectivity, RWH2 in respect of design, RWH8 in respect of new open space provision, RWH21 in relation to ecological enhancement and biodiversity net gain and some areas of conflict with the Design Code.

Section 7: Considerations for Redenhall with Harleston Town

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

1. 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 HAR4. 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.

2. Accessibility and traffic generation

Notwithstanding the above in connection with the principle of development, the Town Council raises concerns at the potential increase in traffic that will be generated by this development and specifically the impact this will have on the Spirketts Lane/Shotford Road junction. The potential for conflict between industrial and residential traffic using Spirketts Lane should be mitigated through traffic calming measures on Spirketts Lane and for industrial traffic to be routed to use alternative routes. The application is accompanied by a transport assessment. The road layout provides for only a single point of access which is a concern should an accident occur and effectively block access to and from the estate.

The Town Council is advised to raise concern over this part of the proposal

The layout includes a pedestrian and cycle routes across the site frontage although there is little cycle provision within the site. There is a north-south footpath provided which would link the site with the development to the north and then onward to the town centre. However there are east west links with adjacent development. If such routes cannot be reasonably provided by this development then the District and County Councils are urged to work closely with the applicant to find a way of securing better and more meaningful connectivity and permeability for the site to connect it better with adjacent development particularly for cyclists. This is an area of concern for local residents

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

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.**

4. **Health and other CIL Contributions**

The impact of the development on local health provision is of concern to local people, including dental provision. The NHS consultee has calculated the capital costs of providing the commensurate health care generated by the development. **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**

It is unclear how much consideration has been given to the Design Guidance and Codes or the guidance in South Norfolk's Design SPD, in influencing the design and layout of the residential dwellings. The residential designs appear to lack some elements of distinctiveness and could have made better use of materials as advocated in the Design Guidance and Codes. Consideration to the layout of the dwellings to create individual character areas or grouping around a green could also have acted to provide a better rural transition for the site's appearance. The lack of new tree provision including Street trees is disappointing and an opportunity has been missed to provide a more attractive, green, rural and less urban visual appearance to the development. In addition there is a paucity of sustainability measures included in the scheme.

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

7. **Open Space**

There is an under provision of open space on this site. The two main areas of open space that are proposed both act to serve other purposes e.g. the northern space to host the attenuation basin and the south eastern space to act as a further buffer between the development and the adjacent lorry park. The spaces provided do not address the open space priorities of the community as set out in Policy RWH 8 and it is disappointing that the open space does not really serve a purpose to provide significant *greening* within the site. It is also unclear where the off-site contribution will be directed.

The Town Council is advised to raise concerns in respect to the lack of open space provided on site, furthermore that those spaces appear to have other purposes than just open space and to ask for clarity where the off-site contributions will be directed to.

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 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.

9. Biodiversity/Ecology/Trees

The ecological information accompanying the application focuses predominantly on impacts. The scheme as proposed provides little or limited enhancement or biodiversity net gain. This is exacerbated by the limited provision of open space and of new tree planting. Given the importance that both national and local planning policy give to ecological enhancement and the creation of beautiful and attractive developments, coupled with the site's location on the edge of the town, a significant opportunity has been missed to properly *green* this development. Little or no enhancements for the benefit of wildlife as required by adopted policies are included, nor is there much provision for street trees,.

The Town Council is advised to raise concerns in respect to the lack of biodiversity net gain proposed by this application and request that further consideration be given to the provision of ecological enhancement, street trees and benefits for wildlife.