



Redenhall with Harleston Town Council

Town Council comments on application 2023/1418: Land north of Spirketts Lane

The Town Council recognises that site HAR4, the subject of application 2023/1418, has been identified in the Adopted Development Plan as allocated for development, and the principle of development has been established.

However, the Town Council **OBJECTS** to the following aspects of the proposed development which are the cause of serious concern to local residents: Community Infrastructure and Traffic Management. The development does not currently satisfy the requirements of Policies RWH5 and RWH15 of the Adopted Redenhall with Harleston Neighbourhood Plan 2022, which forms part of the statutory development plan for the determination of this application.

Policy RWH5: Community Infrastructure and growth

Healthcare

The impact of the development on the quality of local healthcare provision, including dental provision, is of great concern to local people. These were the concerns most commonly expressed throughout the Neighbourhood Plan consultation exercises, and they were expressed very strongly at a recent public meeting held to receive views on this application.

Policy RWH5 states that “new developments will be supported if it can be demonstrated that sufficient infrastructure (physical, medical, educational, green and digital) will be made available to meet the needs of that development” and requires that there are definitive plans in place to increase the capacity of relevant infrastructure ahead of any unmet need being generated by new development taking place.

In response to this application the NHS Norfolk and Waveney Clinical Commissioning body has indicated that the proposed developments would have an impact on healthcare provision in the area and that without any mitigation, the development would not be sustainable. They calculated that the total capital cost of additional healthcare services arising from the development proposal would be £487,476. Of this, £143,840 relates to Primary & Community Care. When responding to previous applications in the town, (e.g. the Briar Farm application) they 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.

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, we request that high priority and necessary CIL funding should be given to ensure that sufficient additional health care provision is made in the town to accommodate this development, consistent with Policy RWH5.

Educational

NCC in their consultee comments deem it is necessary to levy CIL contributions in order to mitigate the costs of an increase in the number of school places arising from the development, and supplied figures setting out these costs, which total around £1m. We request reassurance that the CIL raised from this development pursuant to this request will be used to fund additional school places and facilities within the town, as required by Policy RWH5.

These measures would protect residents' quality of life and reassure the local community that the demands of the new development would be sustainable.

Policy RWH15: Traffic generation and safety

This policy calls for consideration to be given to the level of traffic generated by the proposal and the wider impacts of this traffic, and for measures to be taken to mitigate potential impacts upon highway and pedestrian safety as well as those on traffic flows elsewhere in the town.

The local community are concerned at the increase in traffic which will be generated by this development and the impact this will have on nearby roads - the Spirketts Lane/Shotford Road junction, the Spirketts Lane/Mendham Lane junction and the volume of traffic using Spirketts Lane and Mendham Lane - as well as the knock-on effect on other local roads.

Currently, lorries accessing the industrial estate and lorry park via Spirketts Lane and Mendham Lane require the use of both sides of the carriageway at junctions and often mount the pavement. The increase in residential traffic increases the risk of an accident to pedestrians and motorists.

Traffic wishing to join the A143 by means of a roundabout currently need to travel along Spirketts Lane, Shotford Road and Needham Road to access the Needham roundabout. Needham Road is not suitable for heavy traffic as it is a narrow road with cars parked on one side and poor visibility of oncoming traffic. Traffic wishing to join the A140 often go via narrow local roads going through "the Pulhams"

Heavy traffic could instead be encouraged to join the A143 directly from Mendham Lane if access to the A143 were made easier by means of a roundabout at the junction of Mendham Lane and the A143. The A143 would be in effect a convenient by-pass which would remove heavy traffic from local narrow roads.

The section of Mendham Lane as it narrows to join Old Market Place is a pinch point which may cause congestion as the volume of traffic increases.

We request that, in view of the increase in traffic due to this new development, as well as from two other approved major developments taking place a short distance from this site, and a third site nearby which has also been allocated for development, that a Transport Assessment be undertaken by NCC Highways to evaluate the cumulative effect on nearby roads, and measures taken to mitigate potential impacts upon highway and pedestrian safety as well as those on traffic flows elsewhere in the town, as required by RWH15

We request that the following comments be considered with regard to the relevant Neighbourhood Plan policies.

Policy RWH2: High Quality Design

This policy states that development proposals should be consistent with the Redenhall with Harleston Design Guidelines and Codes, an addendum to the Neighbourhood Plan. The residential designs lack some elements of distinctiveness as advocated in the Design Guidance and Codes. Details such as window arches, details over doors, door and window types, porches etc. appear to be standard designs and do not really invoke a real flavour of Harleston.

We request that further consideration be given to these issues, in the context of the specific design guidance available.

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

This policy supports proposals which provide new children's play areas and spaces, and outside meeting spaces.

The Design and Access Statements stated that the Pre-Application response indicated that the Open Space requirement should include:

- Children's Play Space 1305sqm
- Older Children & Adult Recreational Space 3480sqm
- Informal Recreational Space 5220sqm

Total 10657sqm

The proposal provides either 4,400sqm or 7500sqm – both are quoted in the Design and Access statement. The Public Open Space located to the north of the site hosts the attenuation basin which reduces the amount of useable open space available. The other on-site open space is to the south-east of the site (to provide a buffer with the adjacent lorry park) These do not provide specific play and recreational spaces. The developers recognise

that an Open Space Financial Contribution will be made. It is unclear where this offsite provision will be directed to.

We are disappointed at the lack of play space within the development, and request that the Open Space Contribution should be directed to the Town Council so that it may be used to enhance the existing play equipment on the council's recreation ground.

Policy RWH16: Pedestrian and cycle connectivity

This policy seeks to ensure that new developments are well connected to services and facilities in the town centre, and to the rest of the town and to new and existing services.

The application proposes a new cycle route across the entire site frontage. 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 was an early proposal for a north-south footpath linked via Willow Walk to the town centre, but this has been removed, although it would provide direct access to the town centre.

There is no footpath on Spirketts Lane between the eastern edge of the development and the junction with Mendham Lane, which would provide a convenient pedestrian path to Lidl.

We request that further consideration be given to restoring the link via Willow Walk and to establishing meaningful pedestrian and cycle links providing good connections to the town centre, the rest of the town and to the forthcoming Lidl at Mendham Lane

Policy RWH21: Natural Assets

This policy supports development proposals which provide a net gain in biodiversity, for example by connecting fragmented habitats to create new wildlife corridors. It also requires new buildings to incorporate wildlife friendly measures to protect and enhance wildlife species e.g., swift bricks, hedgehog doors. The scheme as proposed makes no reference to biodiversity net gain or wildlife friendly measures.

There is limited provision of open space and street trees. An opportunity has been missed to provide a more attractive, green, rural and less urban visual appearance to the development.

We request that further consideration be given to securing a net gain in biodiversity, and the provision of ecological enhancement, more street trees and wildlife friendly measures.

Policy RWH22: Climate Change and Flood risk

Flood Risk

Concerns over flooding have been raised by local residents. We note also that Anglian Water have commented that the proposed development will lead to an unacceptable risk of flooding downstream and that Norfolk County Council object to this planning application in the absence of acceptable supporting information.

The Town Council requests that, in line with RWH22, the development should not exacerbate existing surface water or foul drainage problems.

Climate change

This policy encourages the use of features which would increase energy efficiency and reduce carbon emissions. There is little provision for such measures in the plans. The Town Council requests that consideration should be given to incorporating features such as electric charging points, rainwater capture and grey water recycling.

We would also request that the following comment be taken into consideration. This topic is not linked to a Neighbourhood Plan policy.

Streetlights

Concern has been expressed that the developers are making no provision for lighting within the site or in the street adjoining the site. It is noted that the Norfolk Constabulary have requested that, to work in harmony with high levels of Natural surveillance, a carefully designed Lighting plan to cover all vulnerable areas should be in place. We request that developers should provide lighting conforming to the established pattern of the existing streetlights owned by the Town Council.

Appendix 1 – advice provided to Redenhall with Harleston Town Council in respect of Planning application 2023/1418 by Compass Point Planning and Rural Consultants, incorporating concerns raised by residents at the Town Council meeting of 27th July 2023.