



Redenhall with Harleston Town Council

Clerk: Mrs. C. Crane

19th March 2024

Draft Town Council comments on application 2023/3610: Land South of Spirketts Lane

The Town Council recognises that the site South of Spirketts Lane, the subject of application 2023/3610, has been allocated for development.

However, the Town Council **OBJECTS** to the following aspects of the proposed development: Community Infrastructure, Traffic Generation and Safety and High-Quality Design. The development does not satisfy the requirements of Policies RWH5, RWH15 and RWH2 of the Redenhall with Harleston Neighbourhood Plan which address these aspects.

Neighbourhood Plan Policy RWH5: Community Infrastructure and growth

Healthcare

The impact of new developments on the quality of local healthcare provision is of great concern to local residents, strongly expressed during the Neighbourhood Plan consultation. Policy RWH5 states "New developments will be supported if it can be demonstrated that sufficient supporting infrastructure ...will be made available to meet the needs of that development".

If this development is approved, in addition to recently approved developments, there will be 800 more houses in Harleston, substantially increasing the demand for healthcare.

South Norfolk District Council (SNDC) officers informed the Town Council that they engage with the medical practices and the Norfolk and Waveney Integrated Care Board (ICB) to understand capacity requirements. The ICB stated that Harleston Medical Practice has not requested to increase space at their practice at this time. SNDC are having conversations with the Practice to understand what they want to do in the future to safeguard their position, but have advised it is not necessary at this stage to deliver mitigation in terms of healthcare.

We note the ICB commented in relation to this application

The ... primary healthcare service directly impacted by the proposed development...is: Harleston Medical Practice. The latest demand and capacity information suggests that there is currently some estate capacity at this facility, however the figures below do not take into account additional space requirements for PCN roles, community clinics, acute outpatient

services or mental health services taking place within GP practices, all of which are for the benefit of patients to allow care closer to home.

Paddock Road – capacity 1,662

Bullock Fair – capacity 1,934

The Paddock Road site, although understood to be financed by the NHS, has not been used by the GP practice for many years, so it is difficult to understand how its capacity should be included in the capacity assessment unless it is brought back into use.

The ICB have commented that the intention of NHS England and the Norfolk and Waveney ICS is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. The Paddock Road site is ideally located, near the GP surgery and a free car park, for use as an ancillary healthcare site. This would enable Harleston residents to receive care services locally rather than having to travel elsewhere, which is difficult for many people.

While we recognise that plans for capacity are subject to ongoing review by SNDC and the ICB, our concern is there may be a time lag, with residents moving into new dwellings before extra capacity has been put into place, resulting in a deterioration in the quality of healthcare provision locally, or a need for new patients to travel further afield.

The Town Council requests that:

- The capacity of the surgery at Bullock Fair (excluding Paddock Road) is reassessed in the light of the expected number of patients within the surgery's catchment area, taking into account all currently approved developments plus the extra residents expected if this development is approved, and plans made for extra capacity at the surgery at the appropriate time to match the expected growth in population.
- The use of Paddock Road as a community hub be pursued. This would enable residents to receive care closer to home and would mitigate the burden which will be placed on Harleston's healthcare infrastructure by the delivery of extra dwellings.

With no plans currently in place to provide additional health care provision in Harleston, we do not consider this development complies with Policy RWH5.

Education

Norfolk County Council have stated (in their comments of 1st March 2024) that there is currently spare capacity as follows:

- Early Education: 1
- Harleston Sancroft Academy ages 4 – 11: 42
- Harleston Sancroft Academy ages 11 – 16: 5

They also stated that the children generated from the Briar Farm development will result in an additional demand of:

- Children 2-4: 28
- Children 4-11: 97
- Children 11-16 50

Therefore, even without taking account of the recent approval of the development on Land North of Spirketts Lane, there will be a shortfall in the school capacity across all sectors prior to consideration of this proposed development.

This development is stated by NCC to generate an additional 12 Early Education places, 42 Primary School places, 22 High School places and pro-rata SEND. This requires mitigation, funded through CIL, of £1.9 million (at 2023 prices) from this proposed development, to increase class space and improve the educational facilities.

We request that this sum will be forthcoming and will be used to plan the expansion of capacity for Early Years, Primary and Secondary school places at Harleston Sancroft Academy, to become available to accommodate the extra pupils as and when required.

Without this contribution, the development will not comply with Policy RWH5.

Neighbourhood Plan Policy RWH15: Traffic generation and safety

Policy RWH 15 requires measures to be taken to mitigate potential impacts of major new developments upon highway and pedestrian safety as well as on traffic flows elsewhere in the town.

The Briar Farm development, Lidl, and the site north of Spirketts Lane are all located close to each other and will generate traffic using Spirketts Lane and Mendham Lane and the junctions of Spirketts Lane/Mendham Lane and Spirketts Lane/Shotford Road. This proposed development is located in the same area and will also add to traffic at these locations.

NCC advised us that the Highways Authority has to consider each planning application on its individual merits, and in the case of Briar Farm, Lidl and Land North of Spirketts had concluded in each case that the roads and junctions in question had sufficient capacity for development.

We were however advised by SNDC that although developers put in individual Traffic Assessments, NCC Highways will look at the whole picture, having regard to the traffic already there and the allocated sites cumulatively, to determine whether the development is acceptable in this wider context. Presumably they would initiate any works required to mitigate overall traffic growth if this is warranted by the additional traffic emanating from this proposed site when taken in conjunction with the previous traffic flows including those from the approved sites.

The Town Council proposes the following mitigations:

1) Carry out a feasibility study on the benefits of providing a roundabout at the junction of the A143 and Mendham Lane, in the light of the cumulative increase in traffic from the four adjoining sites at Briar Farm, Lidl, North of Spirketts Lane and South of Spirketts Lane. This would make it easier and safer for traffic exiting Mendham Lane to join the A143, especially those turning right, and reduce congestion and delays.

2) A 30mph limit to be introduced for the whole length of Spirketts Lane. Currently the 30mph limit extends from the junction with Shotford Road, to the west of the site North of Spirketts Lane, with a 60mph limit from that point to Mendham Lane. The sites to the North and South of Spirketts Lane have separately proposed a 30mph speed limit across their frontages, and NCC stated that it should encompass the adjacent Bowling Club. We propose the final stretch of road between the Bowling Club and Mendham Lane should also have a 30mph limit.

3) The provision of a footpath along the whole length of Spirketts Lane, to make it possible for residents in the proposed new development to walk to Lidl safely rather than driving there. If no footpath is provided, residents wishing to walk to Lidl may resort to walking on the road, which with the increase in traffic will be even more dangerous.

Neighbourhood Plan Policy RWH2: High Quality Design

“Development proposals should be consistent with the principles laid out in the Redenhall with Harleston Design Guidance and Code. The design of all new developments should reflect Redenhall with Harleston’s local distinctiveness and seek to enhance its quality. All proposals for new development should respect the scale, materials, form, function and character of the existing and surrounding buildings in the area.”

The Design Guidance and Code identifies 10-character areas. The proposed development is adjacent to Character Area 2 bordered by London Road to the north and Mendham Lane to the northeast, and will be opposite the development site North of Spirketts Lane. These are the “surrounding buildings”.

Character Area 3 comprises the industrial estate and lorry park situated opposite the proposed development site, and to the North of these, the Bullfinch Drive housing development, which is some distance removed from the proposed site.

In view of the fact that nearby buildings on Spirketts Lane and Shotford Road were built at an earlier period and are much more spacious, we believe the design of houses on the proposed site should be of similar character and quality to the houses on the site opposite i.e. land North of Spirketts Lane. As described in that site’s Design and Access Statement, these reflect the characteristic forms of Harleston’s local distinctiveness, and provide high quality designs. The brickwork is buff and red and is in harmony with the palette of the surrounding buildings, and it is stated:

The proposed materials and architectural style have been informed by the surrounding vernacular, ensuring that the development is in keeping with its context.

Multi Stock facing brickwork and brick detailing has been proposed which will provide interest to the development. The use of accent detailing such as corbel detailing, voussoir course and soldier course to add interest and help break up the mass of the units. Traditional brick chimneys have been proposed in key locations.

Large windows with simple fenestration are used throughout the development which will bring generous amounts of natural daylight into the internal spaces.

The Design and Access Statement for the proposed site states that it “sits opposite Character Area 3, from which the dwellings take influence of contemporary styling”. We disagree this should be regarded as the primary influence, given that the nearest residential area in Character Area 3 is Bullfinch Drive, a considerable distance away on the other side of the industrial estate, which was developed prior to the adoption of the Neighbourhood Plan. The nearest site is the land north of Spirketts Lane. We disagree with the stated intention of using “contemporary styling”, which is not in accordance with Policy RWH2.

According to the Design and Access Statement, some of the Key design principles are:

- Contemporary design approach with an urban front door in anthracite grey
- Grey contemporary windows and a black entrance door
- 25mm recessed brick panel with brick detail in engineered blue/black brick

The description of Character Style 1, the largest character area in the site, states for most of the dwellings “The house type is proposed to have a contemporary aesthetic in terms of the material treatment and elevation style”.

The designs are generic, and not in keeping with Harleston’s distinctive character. The dark colours of windows and doors and brick detail are not in keeping with the palette of nearby houses. Many of the windows are small and featureless. Front Doors and windows features fail to reinforce the distinctiveness of local buildings.

They do not comply with RWH2 or Design Guidance and Code QP.02, which points out that “There is a great variety of roof pitches & decorative bargeboards. In addition, door decoration is a feature in the town in terms of styles and & quality”, and states that any new development shall: -

- i. Use materials and Architectural detailing that contributes to the historic and vernacular character of the area. It is important that the materials used in proposed development of high quality & reinforce local distinctiveness.
- ii. Demonstrate that the palette of materials has been selected based on a solid knowledge of the local vernacular style and traditions.
- iii. Reflect an intelligent understanding of the building details of the historic settlement cores without resulting in low quality imitations of past styles.

The Town Council requests that further consideration be given to the designs, taking into account the Design Guidance and Code, and having regard to the designs planned for the Land North of Spirketts Lane, to bring the designs into line with the requirements of RWH2 and the Design Guidance and Code.

We note the statement in the National Planning Policy Framework:

Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

Based on the current designs, the proposed development does not comply with Policy RWH2 and does not reflect the Design Guidance and Code.

Open Space

We note that the two attenuation basins provide a large proportion of the area of open space. Given that they will be required to capture rainfall when necessary, we request consideration to be given as to whether the basins are being correctly regarded as open space.

Streetlights

Norfolk Constabulary have commented.

As the development is a green field site there is capacity to incorporate measures that fall within the definition of Crime Prevention Through Environmental Design (CPTED) and should include features such as secure vehicle parking, adequate lighting of common areas, defensible space and a landscaping and lighting scheme which when combined, enhances Natural Surveillance and safety.

The Town Council requests that streetlights should be provided by developers within the site, which are sufficient in number to adequately light the common areas as requested by Norfolk Constabulary, and developers should present proposals as to the number and location of the lights to the Town Council. The lights should conform to the established pattern of the existing streetlights owned by the Town Council, as is stated in Design Guidance and Code QP.04.

Planning and Development Committee
Redenhall with Harleston Town Council