

Ref: GA/AM/06414/L0022dj

14th December 2018

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

By email: gnlp@norfolk.gov.uk

Dear Sir / Madam,

**Representations towards the Greater Norwich Local Plan New, Revised and Small Sites consultation
On behalf of Orbit Homes (2020) Limited in relation to Land at St Mary's Road, Long Stratton
(Site Reference: GNL0509)**

On behalf of our client Orbit Homes (2020) Limited we wish to make representations to the Greater Norwich Local Plan (GNLP) 'New, Revised and Small Sites' consultation. These comments are made in light of the fact that no additional sites in Long Stratton were submitted as part of the previous 'Growth Options document and Site Proposals' in early 2018 and in light of our client's ongoing promotion of Land at St Mary's Road, Long Stratton.

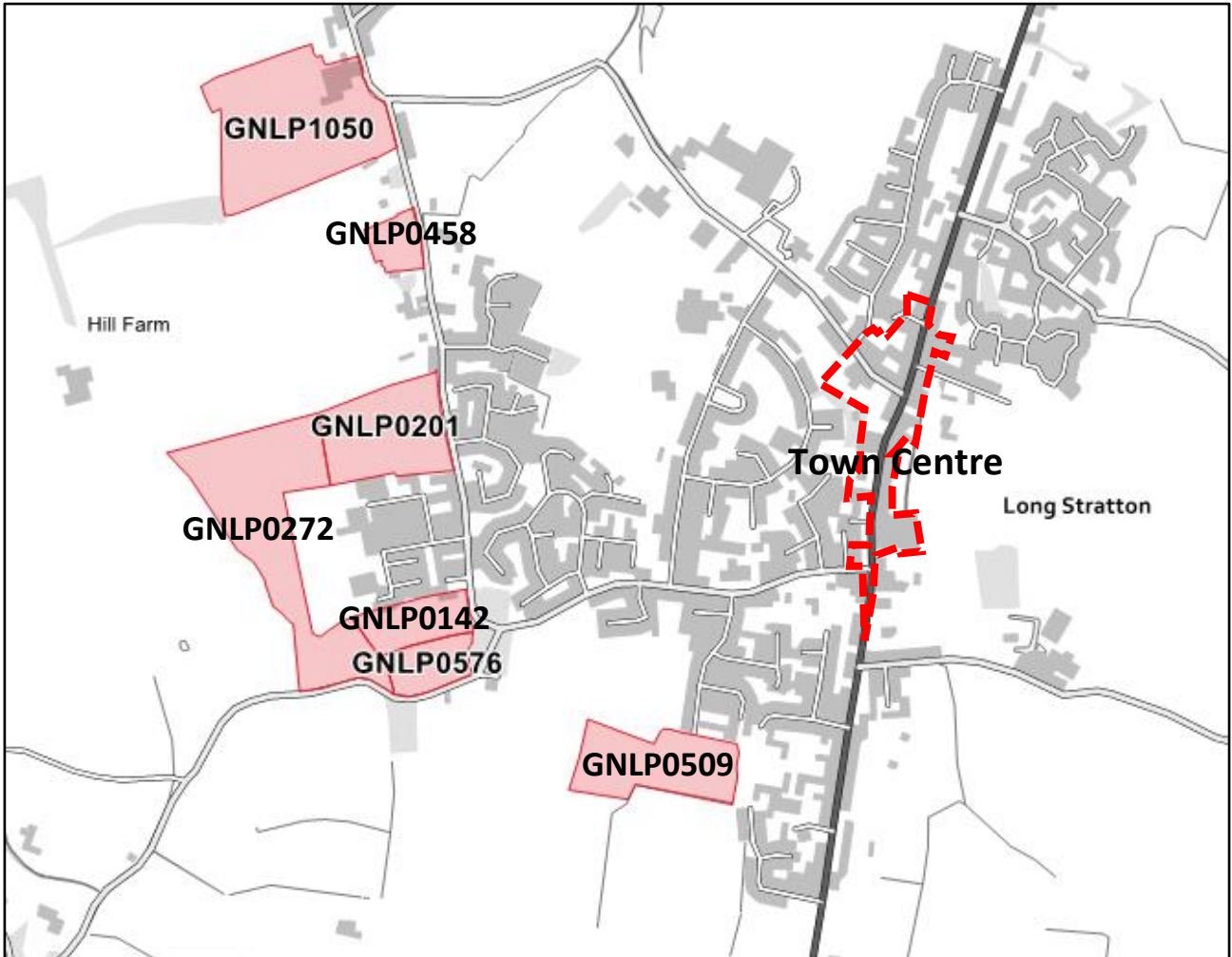
The extensive merits of our client's land in terms of sustainability and guaranteed delivery within 5 years are investigated in our previous submission towards the GNLP dated March 2018. This letter provides an update to this information in light of our client's planning application on the site and also details the constraints faced by the alternative sites in Long Stratton which further demonstrates the benefits of our client's land. We also consider this to be an important opportunity to restate our views on both the appropriate strategic role of Long Stratton within the Greater Norwich area and how the housing needs of Long Stratton should best be met.

Review of Sites

It is noted that no additional sites were submitted during the previous Regulation 18 consultation in Long Stratton. This leaves those sites identified in the previous consultation document as the only options available to meet Long Stratton's additional growth requirements going forwards. In total seven sites have been promoted and identified as potentially suitable for development that lie on the edge of the built-up area of Long Stratton and neighbouring built up area of Tharston and Hapton. Five are promoted for residential development, one for employment and one for a mix of the two.

Our client's Land at St Mary's Road (Site Reference GNL0509) is the only site promoted that lies within the parish of Long Stratton and is by far the closest of all the sites to the town centre. It is also the only site that is assessed positively against all the criteria in the Housing and Economic Land Availability Assessment (HELAA, December 2017).

Four of the other sites are clustered around Tharston Industrial Estate (Site References: GNL0142, 0201, 0272 and 0576), with site 0272 promoted for employment uses and 0201 for a mix of residential and employment uses. All of these sites are identified as having moderate access and highways constraints to development in the HELAA (December, 2017) and are further constrained by noise from existing employment uses. Two proposed residential sites (Site References: GNL0458 and 1050) are located further north and a significant distance away from key facilities and services in the town centre. These sites are similarly constrained in terms of highways and access and GNL1050 is also constrained due to its proximity to designated ecological and heritage sites.



Land at St Mary's Road, Long Stratton (Site Reference: 0509)

As set out in our client's previous representations, Land at St Mary's Road, Long Stratton represents a suitable, achievable, viable and therefore deliverable source of housing land in the first five years of the plan period.

Orbit Homes' full planning application on the site for the erection of 52 dwellings and extensive areas of public open space was recommended for approval by officer's to planning committee on 12th September 2018 (Application Reference: 2017/0810/F). The officer's report (OR) to planning committee (**Enclosed**) undertakes a comprehensive assessment of the application proposals and concludes that the submitted scheme fulfils the requirements of sustainable development in terms of providing environmental, social and economic benefits

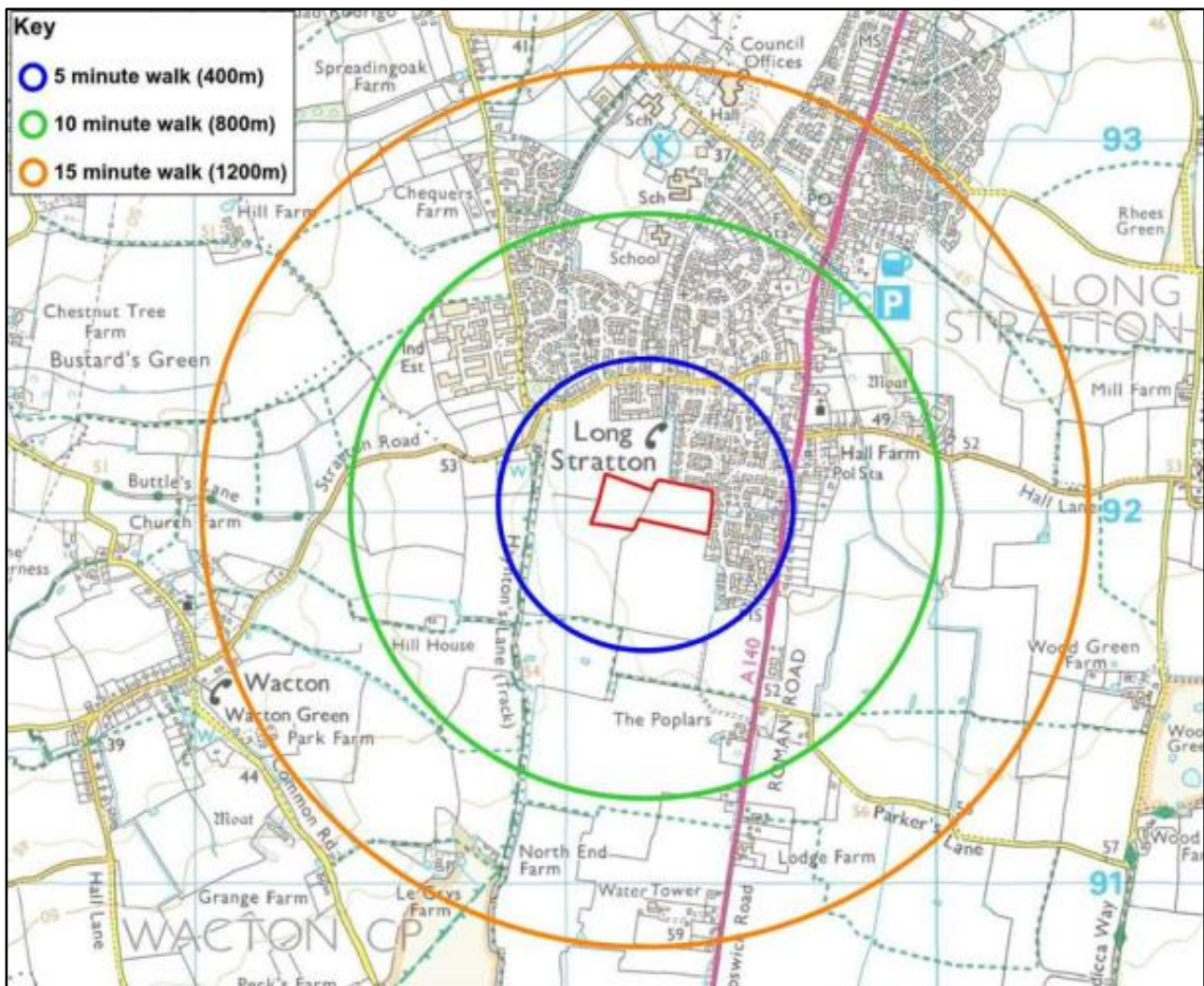
(OR 4.83-4.84) and therefore accords with the requirements of the NPPF and also 1 d) of Policy DM1.3 of the development plan.

Despite the positive assessment of the Council's professional officers, members refused the application on spurious grounds relating to the loss of a category B oak tree at the access into the site, a perceived erosion of the rural undeveloped character of the area and a perceived failure to properly/adequately integrate the open space into the scheme. Our client has appealed against the refusal of their application and a Public Inquiry into the Council's decision is due to take place from 2nd July 2019. As below, with reference to the OR, the Council's reasons for refusal do not stand up to scrutiny and were simply made up by members on the day to justify their desire to refuse the application in the face of no outstanding objections from statutory consultees:

- **Loss of oak tree:** It is acknowledged that development on the site would necessitate the loss of an oak tree near the access from St Mary's Road. This tree is identified as having moderate value and as set out at OR 5.1, its loss is clearly outweighed by the overriding social and environmental benefits of the proposal and the necessity of its removal to allow safe highways access into the site. An additional Tree Strategy Plan (**Enclosed**) was also submitted with the appeal to demonstrate how the proposed layout would accommodate significant new native tree planting to successfully mitigate for the loss of the tree at the entrance into the site.
- **Rural undeveloped character:** This is a completely unjustified reason in light of the Council's Landscape Architect's comments on the application in which he, as set out at OR 4.49, concurs "*that the application site and receiving environment have the capacity to accommodate the proposal and that it will not result in significant harm to the landscape character or visual environment*". The OR also states at paragraph 4.53 that:

"With regards to the general form and character of the existing settlement of Long Stratton, it is considered that the proposed development is a logical extension to the village, which sits to the rear of an existing C20 estate development. With the nature of existing development and proposed development in the wider context, it is considered that the development would not result in any significant adverse impact on the form and character of the area or landscape character.

- **Integration of Open Space:** This is the most spurious of the Council's reasons for refusal as the proposal would provide two well-designed and integrated areas of public open space. The first, located to the east of the site entrance, exceeds the amount of space required by the Council's open space standards and is considered by officer's to be "*well integrated into the overall scheme and provides a good focal point for the new development*"(OR 4.63). The second area is located on the western of the site's two fields and is intended to provide an area for older children/adult play in addition to significant ecological enhancements. As demonstrated on the plan below, both areas would be easily accessible on foot from the majority of Long Stratton and are therefore well integrated into the surrounding area.



Review of Strategic Options

As set out above, the site is in a sustainable location for residential development and is entirely unconstrained with nothing preventing development taking place immediately upon the receipt of planning permission. We therefore consider that it should be allocated in the emerging GNLp to help achieve the required growth in the Greater Norwich area and South Norfolk in particular.

To this end it is important to reiterate our view on the future strategic role of Long Stratton as set out under question 9 of our client's March 2018 representations:

"Whichever growth option is selected, it must place far more emphasis on the delivery of new homes in and around the more sustainable settlements within Broadland and South Norfolk than featured in the current adopted development plan. This should be done with the intention of alleviating issues relating to affordability in both Districts which is a far greater issue than in Norwich.

The preferred growth option selected within the GNLp must recognise this and also ensure the housing requirement is distributed geographically in accordance with the standard methodology housing figure for the 3 local authorities (i.e. 10,032 homes in Broadland, 11,438 homes in

Norwich and 17,518 homes in South Norfolk) to ensure that affordability issues are not increased in South Norfolk because homes are delivered in the wrong location.

On this basis we support a spatial strategy that identifies the role that the most sustainable and best connected settlements within South Norfolk and Broadland can play in providing the homes needed in these areas while also supporting the wider strategy for jobs growth in the Greater Norwich area. We consider that this should be framed around a combination of Option 2 'Transport corridor focussed' and Option 3 'Cambridge and Norwich Tech Corridor focussed'.

The Main Towns and Key Service Centres of the plan area should serve as the focal point for a substantial level of sustainable growth delivered on medium sized sites ranging from upwards of 50 dwellings which can be delivered in the short-term.

It is recognised that Long Stratton is already set to receive a significant level of development through Policy LNGS1 of the Long Stratton Area Action plan which allocates 1,800 homes on land to the east, south-east and north-west of the town. This site allocation is set to bring significant benefits to the town, most notably the provision of a long awaited A140 bypass. It is clear, however, that despite the best intentions of the Council to bring this allocation forward as soon as possible, there have been significant delays caused by the complexity of delivering this key piece of infrastructure.

Delivery projections for Policy LNGS1 have been consistently pushed back. The Councils' Annual Monitoring Report published in January 2017 projected the delivery of 610 dwellings during the five years from 2018/19 to 2022/23¹, but this figure was revised to just 280 dwellings during the same timeframe in the Annual Monitoring Report published in March 2018². Planning applications were finally submitted for the different parts of Policy LNGS1 in January 2018, but we still consider that the Council's delivery projections of 280 dwellings in the next five years are overly optimistic. We would expect the planning process for a site of this scale to take at least 4 years with an added few months following the grant of full planning permission before the first home is delivered. The length of time needed to determine the planning applications for this strategic development is demonstrated by the consultation responses received to the applications so far from Highways England and the Lead Local Flood Authority, amongst others, that clearly demonstrate a need for significant further work prior to determination.

The table below contains the delivery projections in the Council's most recent housing trajectory for sites in Long Stratton. It shows that even based on the Council's overly optimistic predictions for Policy LNGS1, just 35 properties are expected to be delivered in the 3 years between 2018/19 and 2020/21. Following the grant of planning permission, it is anticipated that the development of St Mary's will take approximately 2 years to construct and could be completed by the end of 2020/21. The development of the promoted site would therefore help fill the forecast gap in housing delivery in the town to ensure the GNLP's goals are met.

Long Stratton Housing Trajectory (Source: Joint Core Strategy for Broadland, Norwich and South Norfolk: Draft Annual Monitoring Report 2016-2017, Appendix A – Greater Norwich Area Housing Land Supply Assessment 1st April 2017, March 2018)

| Site | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | 24/25 | 25/26 | Beyond 2026 |
|------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------------|
| LNGS1 | | | | 35 | 35 | 35 | 35 | 35 | 35 | 390 |
| Allocation | | | | | 75 | 100 | 100 | 100 | 100 | 725 |

¹ Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2015-2016, Appendix A – Greater Norwich Area Housing Land Supply Assessment April 2016, January 2017

² Joint Core Strategy for Broadland, Norwich and South Norfolk: Draft Annual Monitoring Report 2016-2017, Appendix A – Greater Norwich Area Housing Land Supply Assessment 1st April 2017, March 2018

| | | | | | | | | | | |
|---------------|-----------|----------|----------|-----------|------------|------------|------------|------------|------------|--------------|
| Cygnets House | 48 | | | | | | | | | |
| 39 Swan Lane | 6 | | | | | | | | | |
| Total | 54 | 0 | 0 | 35 | 110 | 110 | 110 | 110 | 110 | 1,115 |

Conclusions

In conclusion, the fact that no additional sites have been identified in Long Stratton in the New, Revised and Small Sites consultation serves to highlight the importance of our client’s land coming forward for development as soon as possible to meet the forecast gap in housing delivery in the town as a result of slower than expected delivery at LNGS1. It is clear that Long Stratton will need to accommodate growth in excess of that planned through the previous Joint Core Strategy / Area Action Plan and that our client’s site is the most sustainable of the options available to meet the additional growth needed.

We trust that these comments will be given due consideration and look forward to participating further as the Local Plan preparation progresses. If you require any further information in respect of our client’s site then please do not hesitate to contact me.

Yours sincerely



Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

Armstrong Rigg Planning

Tel: 01234 867135

Encs.

Enclosure 1. Planning Committee Report, September 2018

PLANNING APPLICATIONS AND OTHER DEVELOPMENT CONTROL MATTERS**Report of Director of Growth and Business Development****Major Applications**

1. **Appl. No** : **2017/0810/F**
Parish : **LONG STRATTON**
- Applicants Name : Orbit Homes (2020) Ltd
Site Address : Land off St Mary's Road Long Stratton Norfolk
Proposal : Erection of 52 dwellings with associated car parking and amenity space, roads, public open space, landscaping and vehicular access off St Mary's Road.
- Recommendation : Approval with conditions
1. Reduced time Limit - 5 year supply and to bring forward the benefits of the scheme
 2. In accordance with plans
 3. Standard highways conditions
 4. Future management and maintenance of roads
 5. Details of construction of roads and footways
 6. Off-site highway works for footway
 7. Construction traffic management plan and worker parking
 8. Materials to be agreed
 9. Surface water drainage scheme
 10. Foul water to main sewer
 11. Finished floor levels to be agreed
 12. Fire hydrants to be provided
 13. Landscaping and management plan to be submitted
 14. Tree protection measures
 15. Biodiversity Management Plan to be submitted
 16. Contaminated land scheme
 17. Programme of archaeological work
 18. Renewable energy
 19. Water efficiency
- Subject to completion of S106 agreement to secure affordable housing and open space.

Reason for reporting to committee

The Local Member has requested that the application be determined by the Development Management Committee for appropriate planning reasons as set out below.

- 1 Planning Policies
 - 1.1 National Planning Policy Framework 2018 (NPPF)
 - NPPF 05 : Delivering a sufficient supply of homes
 - NPPF 06 : Building a strong competitive economy
 - NPPF 09 : Promoting sustainable transport
 - NPPF 12 : Achieving well-designed places
 - NPPF 14 : Meeting the challenge of climate change, flooding and coastal change

NPPF 15 : Conserving and enhancing the natural environment
 NPPF 16 : Conserving and enhancing the historic environment

1.2 Joint Core Strategy (JCS)

Policy 1 : Addressing climate change and protecting environmental assets
 Policy 2 : Promoting good design
 Policy 3: Energy and water
 Policy 4 : Housing delivery
 Policy 5 : The Economy
 Policy 6 : Access and Transportation
 Policy 7 : Supporting Communities
 Policy 9 : Strategy for growth in the Norwich Policy Area
 Policy 10 : Locations for major new or expanded communities in the Norwich Policy Area
 Policy 14 : Key Service Centres
 Policy 20 : Implementation

1.3 South Norfolk Local Plan Development Management Policies

DM3.8 : Design principles
 DM3.10 : Promotion of sustainable transport
 DM3.11 : Road safety and the free flow of traffic
 DM3.12 : Provision of vehicle parking
 DM3.13 : Amenity, noise, quality of life
 DM3.14 : Pollution, health and safety
 DM3.15 : Outdoor play facilities/recreational space
 DM3.16 : Improving level of community facilities
 DM4.2 : Sustainable drainage and water management
 DM4.3 : Facilities for the collection of recycling and waste
 DM4.8 : Protection of Trees and Hedgerows
 DM4.9 : Incorporating landscape into design

1.4 Site Specific Allocations and Policies

Long Stratton Area Action Plan

1.5 Supplementary Planning Documents (SPD)

South Norfolk Place making Guide SPD

2. Planning History

2.1 None applicable.

3. Consultations

Summary of comments:

3.1 Parish Council Object

Comments on revised scheme:

- Do not support the application for the same reasons as previously provided.
- Long Stratton Council have not agreed to definitely take on the open space. They have stated that should the application be approved they would be interested in taking on the open spaces subject to terms and conditions being satisfactory.

- Original comments:
- Highway access to the development site is not sufficient, there will be further traffic movements, the condition of the existing road is poor and the junction at flowerpot lane is still to see the full impact of Tharston Meadows and therefore is still a concern.
 - It is outside the area action plan when there is still sufficient land in the area action plan that could be an alternative site.
 - It is not an exception site.
- 3.2 District Councillor
Cllr Des Fulcher
- Comments on revised scheme:
- Determine by Planning Services unless it is likely that this revised application will be recommended for approval.
- Original comments:
- Determine by committee due to concerns brought to my attention from local residents in respect of access and potential flooding issues which could arise on this site.
- 3.3 SNC Senior
Conservation and
Design Officer
- No objection
- Comments on revised scheme:
- The layout is acceptable, with a good public space providing a focal point for the housing in terms of character and attractive and spacious entrance point.
 - A large public space to the west is accessible along the main spine road, which is relatively short.
 - Most housing is allocated along the two loop roads, which are spacious and well landscaped. Although there is parking to the front, it is broken up with landscaping.
 - It would be preferable to have a different surface treatment for parking spaces.
 - No further comments on general scheme.
- Original comments:
- The main area of POS is relatively detached from the housing, rather than being more integrated into the development.
 - Public and open spaces, together with the development around them, can often be designed to act as character generators.
 - Concerned at its long-term management and maintenance with the lack of 'sense of ownership' and it needs to
 - be made clear how the space will be looked after.
 - The parking spaces associated with the POS could generate vehicle traffic. It is therefore unusual that it is only a type 6 road is proposed.
 - The smaller POS is more integrated, but still not that accessible from a number of properties. The overall site is big enough that a more central space would be of more benefit and more easily accessed by more residents.
 - The affordable units are to the east of the site and the north-west corner. With the higher density and
 - frontage carparking and smaller gardens, these properties would most benefit from being near to or overlooking the public space.

- Avoiding the tandem parking areas are an improvement, however with the long runs of car parking spaces there is little relief from landscaping.
- Recommend a more comprehensive re-planning of the scheme around a central POS which could become an easily accessible public space and focal point.

3.4 SNC Landscape Architect

Comments on revised scheme:

- The site layout is better with regards to retention of the southern boundary trees, though it is not ideal as the road is shown exactly on the same line as the trees' RPAs, which will invariably mean that construction will breach them. We would need to condition Tree Protection.
- The necessary loss of the prominent oak near the access from St Mary's Road is an unavoidable consequence of the scheme should it go ahead; arguably the proposal is contrary to DM4.8.
- With regards to the new open space; there are a lot of different habitats and uses being proposed here, so this needs to be considered carefully. The details of the space need to be finalised by way of condition, ideally in conjunction with the Parish Council if it to be the adopting party.
- Deliverability of the footpath connections is a key issue. Improved connections to the existing footpaths would be a clear Green Infrastructure benefit but it is still not clear as to the certainty of this. The agent notes that NCC could compulsorily dedicate new rights of way, but there is no definite undertaking that this would be done.

Original comments:

- The LVIA has assessed the landscape and visual effects separately as required and demonstrates that a development could be acceptable in landscape and visual respects.
- I am concerned about details of the scheme which impacts on some of the existing vegetation, and also results in the loss of an arguably locally-significant tree. (Policy DM4.8 is pertinent here, so the justification for the development needs to "clearly outweigh" the loss of this not-insignificant tree.)
- I do not consider that the quality and opportunities presented by the proposed open space have been sufficiently demonstrated or maximised.
- If the application is to be proposed for approval, then I would wish to see if improvements can be made to the scheme to minimise the identified conflicts and improve the situation regarding green infrastructure linkages.

3.5 SNC Housing Enabling & Strategy Officer

No objection

Comments on revised scheme:

- The applicants have now provided plans amending the mix of affordable homes, which provides a good mix of types and tenures to meet a range of housing needs.
- I am now happy with the internal layout of all the affordable homes, and I have no objection to the application.

Original comments:

- The affordable homes are over-concentrated on two bedroom units. This restricts the number of households requiring one or three bedrooms which could benefit from the affordable homes for rent.
- The floor plans of the bungalows show them all to be designed with baths. I would like all to have showers because there is a shortage of bungalows which comply with current Building Regulation standards and are therefore suitable for people who might struggle to use a bath.
- I propose an alternative tenure mix taking into account my comments and proposed mix.

| | | |
|-----|--------------------------------|----------------|
| 3.6 | SNC Environmental Quality Team | To be reported |
| 3.7 | NCC Highways | No objection |

Comments on final revised scheme:

- Further to the e-mails below we have no further comments relating to the layout of the estate roads (drawing 6910-SL02-G)

Comments on revised scheme:

- The previously recommended contribution towards the delivery of the Long Stratton bypass will not be pursued.
- There are no other off-site highway works that would be required in direct mitigation of the proposals.
- The technical comments in our response of 22 May (Points 1-17) remain relevant.
- With regards to the installation of MOVA at the signal junction of A140 with Flowerpot Lane our Signals Team have been reviewing this junction. The signal timings have recently been altered and the impact of this on traffic flows is being monitored.

Original comments:

- Amendments required in respect of internal layout, visibility splays, junctions, visitor parking, turning heads, parking spaces, private drives, turning/manoeuvring and garages.
- Requested plans showing the footway improvements on Flowerpot Lane and confirming the level of visibility at the St Mary's Road / Flowerpot Lane junction. These should be secured via condition, not S106.
- In our view the road serving the POS should be upgraded to a type 3 road and a sperate car park provided for the POS.
- No dig construction is not acceptable within adoptable carriageway. The existing tree east of where the proposed estate road meets St Mary's Road will need to be removed.
- The type 6 road along the southern boundary of the site will need to be relocated outside of the route protection areas of the trees along the southern boundary.
- Requests a pro rata contribution towards the delivery of the Long Stratton bypass.

3.8 NCC Ecologist No objection

Comments on revised scheme:

- No further specific ecological information has been submitted, however the I have reviewed the new Landscape Masterplan and Landscape Masterplan Context documents. They do not appear to conflict with my previous comments dated 12th June 2017. As such I have no further comments.

Original comments:

- This application is supported by a Preliminary Ecological Appraisal. This report recommended a Preliminary Bat Roost Assessment on any mature trees to be affected by proposed works and this has now been completed. The report appears fit for purpose and concludes that all trees to be removed / pruned had negligible potential for roosting bats apart from one, which had low bat roost potential. Recommendations were made, which I would like to see included as conditions. These relate to retaining boundary features, including bird and bat boxes and a timetable for implementation.

3.9 NCC Lead Local Flood Authority No objection

Comments on revised scheme:

- We are now satisfied that sufficient information has been supplied to demonstrate that this site can drain in accordance with the NPPF, subject to conditions to ensure that the surface water drainage scheme is implemented as proposed.
- We are pleased to see now that a revised drainage strategy has been provided that considers the amended layout.
- We have reviewed the proposals as submitted and also clarified two points with the consultants Rossi Long relating to the calculations and Anglian Water consent.

Original comments:

- Insufficient information provided regarding the drainage hierarchy, detailed drainage design and future maintenance.
- No geotechnical investigation or infiltration testing undertaken on site.
- Insufficient information provided to support discharging to the watercourse.
- No detailed agreement from Anglian Water to discharge to their system.
- Insufficient modelling for the drainage network included the 1:1, 1:10 and 1:100 critical rainfall event plus 40 % climate change.
- No details of how all surface water management features to be designed in accordance with The SuDS Manual
- Insufficient information about groundwater levels.
- No plan for the management of flows in exceedance of the 1:100 rainfall event nor a management and maintenance plan.

- 3.10 NCC Historic Environment Service No objection
- Comments on revised scheme:
- Based on currently available information the proposed amendments will not have any significant impact on the historic environment and we do not wish to make any new recommendations for archaeological work.
- Comments on original scheme:
- There is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be adversely affected by the proposed development.
 - If planning permission is granted, we ask that this be subject to a programme of archaeological mitigatory work.
- 3.11 NCC Infrastructure Development No objection
- Comments on revised scheme:
- There is sufficient places at local schools for children from this proposed (revised) development.
 - Taking into consideration the permitted development in Long Stratton (2013/0265 and 2015/0385) although there is spare capacity within the school sectors, there will be large scale housing growth in the Long Stratton area and it is expected that the funding for additional places if necessary would be through CIL as this is covered on the District Council's Regulation 123 list.
 - A development of 52 dwellings would place increased pressure on the library and mitigation is required to increase the capacity of Long Stratton library. This would be through CIL as this is covered on the District Council's Regulation 123 list.
 - This development would require 2 fire hydrants at a total cost of £1,637, which should be dealt with through condition.
 - We understand that opportunities to connect to the wider public rights of way network have been explored to the west and south of the site, but have proved to be undeliverable.
 - If South Norfolk are minded to approve the application, they may wish to develop a project delivered through the Greater Norwich Growth Board GI program team towards strategic improvements on the wider public rights of way network. This will go towards mitigating the impacts of this and other/cumulative development in the area.
- Comments on original scheme:
- There would be insufficient places at Manor Field Infant & Nursery School for children from this proposed development should it be approved. The funding for additional places if necessary would be through CIL as this is covered on the District Council's Regulation 123 list.
 - The above funds would be needed to expand existing schools in situ.
 - A development of 66 dwellings would place increased pressure on the library and mitigation is required to increase the capacity of Long Stratton library.
 - This development would require 2 fire hydrants at a total cost of £1,630, which should be dealt with through condition.

- Given that the proposed open space for this site is in proximity to Public Rights of Way (PRoW) and an Neighbourhood Green infrastructure Corridor, the development should facilitate the required local connections into the Green Infrastructure network.
- A contribution will be sought in order to secure the necessary infrastructure as set out in the Area Action Plans.

3.12 Anglian Water Services Ltd

No objection

Comments on revised scheme:

- The sewerage system at present has available capacity for foul drainage from this development.
- The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is acceptable.

Original comments:

- The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. No evidence has been provided to show that the surface water hierarchy has been followed as stipulated in Building Regulations Part H. This encompasses the trial pit logs from the infiltration tests and the investigations in to discharging to a watercourse. If these methods are deemed to be unfeasible for the site, we require confirmation of the intended manhole connection point and discharge rate proposed before a connection to the public surface water sewer is permitted.
- The sewerage system at present has available capacity for foul drainage.

3.13 Norfolk Wildlife Trust

No comments received

3.14 Police Architectural Liaison Officer

Comments on revised scheme:

- Recommends the principles of Crime Prevention through Environmental Design and security measures included in Secured by Design Homes 2016 guidance are adopted across this development.
- Recommends measures to maximise surveillance of car parking and public open space.
- Concerned that the proposed timber boardwalk over wetland zone introduces a potential water safety hazard and questions a 'trim trail' in this location.

Original comments:

- Close potential gaps in boundary to POS adjoining plots.
- Provide lockable vehicle access control at both POS locations for emergency/maintenance
- Provide effective vehicle mitigation features for both POS's
- Provide 1.8m boundary treatment to protect rear of properties
- Provide similar sub-divisional boundary treatment across gardens
- Include appropriate sensed security lighting Recommendation the principles of Crime Prevention through Environmental Design (CPTED) and security measures recommended in Secured by Design, Homes 2016 guidance are included across this development.

3.15 NHS England

Comments on revised scheme:

- No comments received.

Original comments:

- NHS England would expect these impacts to be assessed and mitigated. There is 1 main GP practice within a 2km catchment of the proposed development. The practice does not have sufficient capacity for the additional growth resulting from this development and proposed cumulative development in the area.
- NHS England would suggest that healthcare contributions should be sought to contribute to the provision of sustainable primary care services in the area, particularly for the additional residents generated by development growth.
- South Norfolk Council has recently advised that Healthcare is not currently contained on their CIL123 list, consequently, until this policy is addressed, it is confirmed mitigation cannot be obtained for primary healthcare. NHS England understands this matter is now being addressed through the Greater Norwich Growth Board forum.
- Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.

3.16 GP Surgery

No comments received

3.17 Other Representations

67 letters of objection received, plus an additional 11 letters received following the most recent amendments, summarised as follows:

- Concerns about overlooking and loss of privacy
- Visibility on St Mary's Road is inadequate due to parked cars
- Additional traffic will further lengthen the time to drive through Long Stratton
- Further increase in noise and air pollution
- Development falls outside of development boundary
- Local GP surgery is already running to capacity
- Schools do not have the capacity to accommodate additional demand
- Access on St Mary's Road is too narrow and two vehicles are unable to pass
- Safety of pedestrians and residence of St Mary's Road will be put at risk
- Site not allocated in Long Stratton Area Action Plan
- Flowerpot Lane and the A 140 tail-backs of traffic makes crossing Flowerpot Lane dangerous
- Construction traffic and additional vehicles will have a dramatic effect on St Mary's road
- Local services and facilities can cope with additional demand
- Traffic will put significant safety risk on pedestrians crossing the junction of Flowerpot Lane & A140
- Concerns of risk of flooding as a direct result of development
- Local area is prone to flooding and the drainage systems will be insufficient
- Site is frequently subject to flooding during prolonged periods of rain

- Anglian water concerns over foul water drainage on St Mary's Road
- Concerns over the capacity of the St Mary's road/Flowerpot Lane junction
- Development does not fit in with current look of the area
- Problems with the drainage ditch to the rear of properties at St Mary's Road by lack of maintenance
- Flowerpot Lane is liable to flooding
- St Mary's Road is hazardous to cross already due to parked cars
- How are heavy vehicles going to safely access the proposed site
- Traffic would be a hazard to children on their way to school
- Wildlife would be affected
- The extra traffic will add to a congested village and busy junction off the A140
- Public open space should be spread around the outside of the development to act as a buffer
- Loss of rural views
- Concerns about construction traffic access to the site
- Many ignore 20mph speed limits
- Concern about loss of value of property
- Existing road surface in poor condition
- Ignores 5 year Area Action Plan
- Existing pedestrian zebra crossing hazardous to pedestrians
- Concerns about the proposed public open space and potential traffic impacts

4. Assessment

Site description

- 4.1 The site is located in Long Stratton immediately south of St Mary's Road, outside the development boundary but within the Norwich Policy Area (NPA).
- 4.2 The site currently comprises of two agricultural fields of some 3.6 hectares that are contiguous with the south-western edge of the built up area of Long Stratton. The site is accessed from an existing vehicular link from St Mary's Road via a field gate. There are no Public Rights of Way which traverse or adjoin the site.

The application

- 4.3 The application is a full planning application and seeks approval for all matters including access, parking, public open space and associated infrastructure.
- 4.4 The application proposes the erection of 52 dwellings. Of these, 17 dwellings will be provided as affordable units (33%), 6 of which are bungalows.
- 4.5 The main issues for consideration are the principle of development in this location, access, design, layout; drainage; landscaping, ecology and residential amenity.

Principle of development

- 4.6 Planning law (section 38(6) of the Planning and Compulsory Purchase Act 2004) requires that applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Material considerations include the National Planning Policy Framework (NPPF).

- 4.7 In accordance with both the Council's adopted development plan and the NPPF, in cases where there are no overriding material considerations to the contrary, development proposals for housing that accord with the development plan should be approved without delay.
- 4.8 In this regard, consideration should be given to Policy DM1.3 which makes provision for development to be granted outside of Development Boundaries, such as this, where one of two criteria are met: either c) where specific development management policies allow; or, d) where there are overriding benefits in terms of economic, social and environmental dimensions of sustainable development, as set out in Policy DM1.1.
- 4.9 In terms of c), the current proposal is not considered to meet the requirements of this criterion. In terms of d), establishing whether there are any overriding benefits will be confirmed following an assessment of all the harms and benefits of the scheme.
- 4.10 Where development proposals do not accord with the development plan, consideration should be given to whether there are material considerations that otherwise indicate that development should be approved.
- 4.11 Of particular relevance to applications for housing development is paragraph 11 of the NPPF which states that:
- For decision-taking this means:*
- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 4.12 It is considered that it is still appropriate to use the JCS housing requirement, having regard to the revised NPPF (Para 73) given that the JCS is less than 5 years old. The 2017 Greater Norwich Area Housing Land Supply Assessment, published as Appendix A of the Joint Core Strategy Annual Monitoring Report, shows that against the JCS requirements there is 4.61 years supply in the combined Norwich Policy Area (NPA), a shortfall of 1,187 dwellings. Consequently, the policies which are most important for determining the application in the NPA cannot be considered up-to-date and applications for housing should continue to be determined within the context of the titled balance referred to in paragraph 11 of the NPPF.
- 4.13 However, in June 2017 an updated Strategic Housing Market Assessment (SHMA) was published for Central Norfolk (the Greater Norwich authorities plus, North Norfolk and Breckland). The SHMA assesses the Objectively Assessed Need for housing between 2015 and 2036 using the most recent evidence available. Unlike the evidence underpinning the JCS, the SHMA also includes an assessment of the contribution made by student accommodation in line with the Planning Practice Guidance.
- 4.14 A housing land supply of 8.08 years can be demonstrated against the SHMA assessment of OAN, a surplus of 5,368 units. Whilst the guidance to which the Central Norfolk SHMA accords has now been superseded, it is considered, nevertheless, that the SHMA remains an intellectually credible assessment of housing need. Assessments such as the SHMA will continue to form the basis of local plans submitted ahead of January 2019, including some within the Central Norfolk Housing Market Area. The extant PPG guidance continues to state that "Considerable weight should be given to the housing requirement figures in adopted Local Plans ... unless significant new evidence comes to light. Therefore it remains entirely appropriate to give weight to the SHMA as a material consideration in the determination of planning applications.

- 4.15 The abundant housing land supply that is apparent in relation to the most up-to-date evidence of housing needs (8.08 years) should therefore be given weight in the decision-making process as a material planning consideration. This factor effectively diminishes the weight that would otherwise be attached to the benefits of increased housing delivery in the context of Policy DM1.1 and NPPF Paragraph 11.
- 4.16 On the basis of the above, the following assessment seeks to establish the benefits of the scheme and any harm that would be caused in the context of the relevant development plan policies and the NPPF, with reference to the three dimensions of sustainable development (economic role, social role and environmental role). These three headings form a convenient basis for structuring the assessment of the proposal against development plan policies.

Economic role

- 4.17 The NPPF confirms the economic role as "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure."
- 4.18 The construction of 52 dwellings would help enhance the economic viability through local spending from future occupants of the dwellings.
- 4.19 In addition to the above, the scheme would also provide some short term economic benefits from construction of the dwellings.
- 4.20 It should be noted that the development would be subject to the Community Infrastructure Levy.

Social Role

- 4.21 The NPPF confirms the social role as "supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."
- 4.22 The proposed scheme would provide housing in a location where the JCS identifies a shortfall in housing land supply against requirements which would represent a social benefit. However, the significance of this benefit is diminished by the most recent evidence of the updated SHMA which identifies a housing land supply in excess of 8 years and this is material consideration in determining this application.
- 4.23 The social role highlights the need for housing to have access to a range of accessible local services. Long Stratton is identified as a Key Service Centre and defined as having good access to a wide range of facilities and services. The site is also well located in relation to Long Stratton High School, Manor Field Infant School, Long Stratton Medical Partnership, and Long Stratton leisure centre. The site is also well located to existing bus stops.

Access and highway impacts

- 4.24 Access into the site is proposed off St Mary's Road located to the north of the site.
- 4.25 Off-site highway works have been requested by the Highway Authority, which include a new footway across the front of numbers 1 – 10 Glebe Close (Flowerpot Lane) to connect into the existing footway network as well as upgrading the nearby bus stop by making it DDA compliant. These improvements will be secured by condition. Information has also been provided by the applicant confirming the level of visibility at the St Mary's Road / Flowerpot Lane junction.

- 4.26 The Highway Authority has carried out an assessment of the proposed access arrangements and the site layout and following amendments to the plans has confirmed that they have no objections subject to conditions. As such it is considered that the proposals accord with Policy DM3.11 of the South Norfolk Local Plan.
- 4.27 With regards to the wider impacts of the development on the surrounding highway network, the Highway Authority have confirmed that there are no other off-site highway works that would be required in direct mitigation to the development. They have also considered the impact of the proposals on the capacity of the signal junction of the A140 and Flowerpot Lane and confirmed that the signal timings of this junction have recently been altered and the impact of this on traffic flows is being monitored by the County Council to see if there is benefit in employing a scheme to further improve this junction. If a scheme to improve this junction is deemed necessary in the future then this would be employed as part of a financial contribution already secured from the Chequers Road, Tharston development towards improvements to this junction and traffic flows in Long Stratton. As such it is not considered necessary or appropriate to secure any additional contribution for this junction where mitigation has already been secured and no direct impact of this development have been identified.
- 4.28 In terms of exploring the potential for a financial contribution towards the Long Stratton by-pass, Members should note that this planning application falls outside of the allocation (LNGS1) and as such it is not reasonable to seek a contribution towards the by-pass. Policy LNGS1 makes it clear that contributions to the by-pass can only be secured for development within the allocation in accordance with the LSAAP and not from developments outside of this area. As such requiring a contribution towards the by-pass from this proposed development, which is not dependant on a by-pass coming forward, would not be justified in planning policy terms and therefore is not being sought by the Council.
- 4.29 In terms of car parking provision, this is proposed in accordance with current guidance contained in Norfolk County Council's Parking Standards for Norfolk. This equates to at least 1 space per one-bedroom dwelling, 2 spaces per two-bed and three-bed dwellings and 3 spaces per four and five-bed dwellings, totalling 118 spaces across the site. In addition a small carpark comprising of 6 spaces and cycle parking is proposed in the north-west corner of the public open space, for visiting members of the public.
- 4.30 The combination of different parking types proposed ensures that the street scenes are not overly dominated by car parking and helps create varied character across the site. This has led to tandem parking in some instances, but this is required to remove cars from the street scene and is considered to be acceptable in design terms. Where on-street parking has been proposed, this has been kept to a minimum and is well overlooked and broken down with landscaping to help enhance the character of the street. The layout of the development in respect of parking is therefore on balance considered acceptable.
- 4.31 Concerns have been raised by local residents and the Parish Council in respect of access to the site and the wider traffic impacts of the development. Whilst I fully appreciate the concerns raised, it is noted that the Highway Authority consider that the access arrangements are satisfactory and that the wider traffic impacts are acceptable for the reasons set out above. In view of the above, I do not consider that the application can be refused on the concerns raised and therefore the development is considered to comply with Policy DM3.11 and DM3.12.

Connectivity and Green Infrastructure

- 4.32 It is noted that there are no Public Rights of Way which traverse or adjoin the site.
- 4.33 With regards to the wider connections to the surrounding public rights of way and green infrastructure network, the applicant has explored options for footpath connections to provide connectivity to the Green Infrastructure corridor (LS6) between Long Stratton and Wacton Common.

- 4.34 Having explored these options for wider connections, it is apparent that such connections require third party land. The land owner has advised the applicant that he would not be prepared to allow any further footpaths over his land. It is therefore clear that it will not be possible to secure a private agreement to secure such footpath connections between the site and wider connections.
- 4.35 With regards to the County Council powers to compulsorily dedicate public footpaths, it is considered that in this case the relatively limited benefit of delivering such connections in this location would not justify the County Council using its powers to compulsorily dedicate an additional connection and that no definite undertaking can be guaranteed by the County.
- 4.36 Should improvements be required with regards to the future long term planned growth in Long Stratton it is expected that the funding would be through CIL or other contributions as this is covered on the District Council's Regulation 123 list. On this basis it is considered that whilst improved connections to the existing footpaths would be desirable, on balance no objection can be substantiated in terms of a lack of wider connection to the surrounding green infrastructure network or public rights of way.

Affordable housing

- 4.37 The JCS requires the proportion of affordable housing and mix of tenure sought to be based on the most up to date needs assessment of the plan area, with the proportion to meet the demonstrated need at the adoption of the plan being 33% affordable housing on schemes of 16 or more.
- 4.38 The application proposes 33% affordable housing in accordance with the JCS and in excess of the need set out in the SHMA and is therefore acceptable.
- 4.39 In terms of the tenure mix, in line with the revised NPPF (2018) Para 64, major development involving the provision of housing is required to deliver at least 10% of the homes to be available for affordable home ownership unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Accordingly the mix now sought includes the requirements of Para 64 of the NPPF in the overall affordable housing mix and would secure affordable home ownership and affordable rent.

Residential Amenity

- 4.40 Policy DM3.13 Residential amenity directs that development should not be approved if it would have a significant adverse impact on nearby resident's amenities or the amenities of new occupiers.
- 4.41 The development site sits to the rear and side of properties on St Mary's Road and Lime Tree Avenue. These properties are largely characterised by semi-detached and detached bungalows/chalet bungalows to the north and detached two and two and a half storey properties to the east. The layout of the proposed development along the eastern boundary addresses the relationship with those properties with private gardens to the rear, separating both the proposed and existing houses from one another with good separation distances where back-to-back or side-to-side relationships are proposed. With regards to development along the northern boundary, existing properties are separated by both the public open space and existing private gardens/ parking areas to the rear of those properties. Where plots 1 and 36 side onto existing properties, these have been designed as bungalows with hipped roofs, to minimise their impact.
- 4.42 As such it is considered that the distances achieved, coupled with the retention of and further planting of landscaping along the boundaries would ensure that no significantly adverse impact on the amenities of those existing or proposed properties would result. It is therefore considered that the proposal satisfies policy requirements in respect of Policy 2 of the Joint Core Strategy and DM3.14 of the Development Management Policy Document.

Education

- 4.43 In terms of the future capacity of educational facilities within the catchment area of the development, which include primary and secondary schools, it has been confirmed that there is currently spare capacity within the school sectors for both this development and other permitted developments in Long Stratton. In terms of the future long term planned growth in Long Stratton it is expected that the funding for additional places, if necessary, would be through CIL as this is covered on the District Council's Regulation 123 list. Therefore there is no objection in terms of school capacity to this application.

Healthcare

- 4.44 NHS England have commented that the local GP practice does not have sufficient capacity for the additional growth resulting from this development and proposed cumulative development in the area. Members should note that Healthcare is not currently contained on the District Council's Regulation 123 list, and as such mitigation cannot be obtained for primary healthcare. NHS England understands that this matter is being considered through the Greater Norwich Local Plan and that contributions cannot be sought directly from development in conjunction with this or other planning applications. On this basis NHS England have confirmed that they do not wish to raise an objection.
- 4.45 Whilst the concerns of NHS England are noted, GPs are independent contractors of the NHS and so are essentially private businesses and new surgeries are funded/instigated through the relevant primary health care body and are not provided by S106/CIL. As such there is no policy basis for seeking contributions by S106 or provision in the CIL Regulation 123 list, for primary healthcare facilities and it would not be possible to secure any contribution towards primary healthcare and could not be substantiated as a reason for refusal.

Summary of social role

- 4.46 In summary, Policy 14 of the JCS, identifies Long Stratton as a Key Service Centre having access to a good level of services and facilities. It is considered that the proposals fulfil the social role in the context of the NPPF as well as delivering housing on this site, including 33% affordable housing. It is therefore considered that the scheme meets the social role of the NPPF.

Environmental Role

- 4.47 The NPPF confirms the environmental role as "to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

Impact on landscape and form and character of the area

- 4.48 Paragraph 170 of the National Planning Policy Framework requires that planning decisions recognise the intrinsic character and beauty of the countryside, which is reflected in Policy DM1.3 of the Development Management Policies document. Planning Practice Guidance clarifies that conservation and enhancement of the landscape, not only designated landscapes, contributes to upholding this principle. Policy DM4.5 requires all development to respect, conserve and where possible enhance the landscape character of its immediate and wider environment.
- 4.49 The application is supported by a Landscape and Visual Impact Assessment (LVIA) that has been produced in accordance with recognised best practice. The LVIA has assessed the landscape and visual effects separately as required. The document refers to the published local landscape character assessment, but provides a more localised study in light of the site's close proximity to the settlement edge. The LVIA concludes that "the application site and receiving

environment have the capacity to accommodate the proposal and that it will not result in significant harm to the landscape character or visual environment". The Council's Landscape Architect has assessed the LVIA and agrees with its conclusions.

- 4.50 With regards to Policy DM4.8, which seeks to protect trees and hedgerows, the scheme proposes to retain these along the majority of site boundaries, which includes the majority of existing trees and hedges along the east and southern boundaries. The Council's Landscape Architect is generally supportive of the proposals, however he has raised some concerns about the potential impact of the proposed road layout on the southern boundary of the site, which follows the same line as some of the trees root protection areas. Notwithstanding these concerns, he goes on to comment that provided the working margins of these trees can be kept to a minimum, then the potential encroachment is tolerable, subject to a condition detailing tree protection measures to ensure that the existing trees are maintained in good condition during construction. Therefore, subject to the above condition it is considered that the scheme is acceptable in this respect.
- 4.51 The only other notable loss of trees is a single oak tree near the access from St Mary's Road, which is necessary to facilitate access into the site. The submitted Arboricultural Impact Assessment identifies this tree as having moderate value (Category B). In considering this, the proposals must be assessed in conjunction with the desire to provide a suitable access into the site. The Highways Authority has indicated that the proposals will necessitate the removal of this tree to provide safe access into the site. Whilst recognising the status of the conflicting policies, I consider that in this instance greater weight should be afforded to the requirements of highway safety and access to the site which is specific for development in this location.
- 4.52 To mitigate against the loss of the tree it is recognised that the retention of other visually prominent trees along the site boundaries, and proposed replacement tree planting will help to retain the overall landscape character of the site boundaries. As such it is considered that on balance the loss of the tree is acceptable in recognising the weight afforded to the requirements of highway access and proposed mitigation measures.
- 4.53 With regards to the general form and character of the existing settlement of Long Stratton, it is considered that the proposed development is a logical extension to the village, which sits to the rear of an existing C20 estate development. With the nature of existing development and proposed development in the wider context, it is considered that the development would not result in any significant adverse impact on the form and character of the area or landscape character. The proposals are therefore, on balance, considered acceptable in respect to the impact on the landscape and form and character of the area.

Layout, appearance and scale

- 4.54 The site layout and house types have been subject to a detailed assessment by the Senior Conservation and Design Officer and following discussions with the applicant have been amended.
- 4.55 In considering the overall scale and layout of the development, regard has been given to the density and form of existing development in Long Stratton. The site layout comprises a mix of 1, 2, 3, 4 and 5 bedroom properties. These include a combination of two storey detached, semi-detached and terraced dwellings and six bungalows. The scale of the proposed development is considered to be appropriate for its context.
- 4.56 With regards to the overall design of the site it is considered that the creation of a simple layout around two loop roads and open space helps provide clear and legible routes across the site. The overall amended layout and design of the proposed development is therefore considered acceptable.

- 4.57 In terms of the location of affordable housing, the application has separated the affordable units into two main areas. 11 are located in the north-west corner of the site and the remaining 6 are located along the eastern boundary of the site adjacent to an open space. Given that the affordable units have been dispersed and are located close to public open space, officers consider that the distribution of the affordable units as proposed is acceptable and accords with the Development Plan.
- 4.58 House types, both market and affordable, have been considered in the context of the wider surroundings to help reinforce and enhance the character of the proposals. The house types use traditional forms and materials, yet have a distinctive appearance. A variety of materials are proposed including red brick, render, pantiles and white uPVC windows. These are varied across the site and help to distinguish and define those areas.
- 4.59 Having assessed the overall scale, form and appearance of development it is considered that the proposed scheme would respect the existing character and arrangement of development as well as providing an acceptable transition between the existing built up area of Long Stratton and the open countryside to the south and west of the site.
- 4.60 Overall, it is considered that the amended scheme has been well thought out and results in a development with a locally inspired character that relates positively to its surroundings. Information has also been submitted that demonstrates how the proposals comply with the South Norfolk Place-Making Guide SPD, including a Building for Life assessment.
- 4.61 It is therefore considered that the scheme is acceptable in terms of its design, scale and relationship to the surrounding properties and accords with DM3.8 of SNLP, Policy 2 of JCS and Section 12 of NPPF.

Proposed public open space and landscaping

- 4.62 In terms of public open space, the Council's current adopted Recreational Open Space Standards for Residential Areas (1994), requires a minimum amount of outdoor play facilities and recreational open space to be provided, commensurate with the level of development proposed to meet the need of occupants.
- 4.63 The development proposes two areas of public open space. The first area is located to the east of the site entrance and backs onto existing development to the north. This space has been increased in size following discussions with the applicant, resulting in an area of open space that exceeds the amount of space required by the current open space standards. It is considered that following amendments, the space is now well integrated into the overall scheme and provides a good focal point for the new development.
- 4.64 The second area of public open space is located to the west of the proposed development and is intended to provide an area for older children/adult play in addition to significant ecological enhancements. Options for enhancing this area of open space have been submitted by the applicant, including a revised Landscape Masterplan for the site showing indicative proposals for ecological enhancements and a Context Masterplan showing how the proposed public open space could provide potential connections to the surrounding green infrastructure network and public rights of way.
- 4.65 Having regard to the options for enhancing public open space in this area, it is recognised that there is a broad body of evidence that demonstrates a shortage in the quantity of all types of open space in Long Stratton, with the shortfall worse in natural/semi-natural green space, followed by formal sports provision and informal amenity space. This is recognised in the South Norfolk Council – PPG17 Open Spaces, Indoor Sports and Community Recreation Assessment (2007) and also in the Long Stratton Area Action Plan (LSAAP) to some extent.

- 4.66 In this context it is considered that the proposed options represent a benefit in the planning balance, in terms of the social and environmental dimensions set out in Policy DM1.1.
- 4.67 In respect to landscaping, the Council's Landscape Architect has confirmed that he has no objections to the proposals and that the general approach to the proposed open space and landscaping is acceptable, subject to a detailed landscaping and management scheme, to ensure that the details of the new open space are agreed at a later stage, ideally in conjunction with the Parish Council if it to be the adopting party. Therefore subject to conditions it is considered that the scheme would accord with the aims of Policy DM3.15 and DM4.9 of the South Norfolk Local Plan, JCS Policies 1 and 2 and section 15 of the NPPF.

Surface water drainage

- 4.68 A Flood Risk Assessment (FRA) and Drainage Strategy have been submitted with the application based on detailed site investigations carried out by the applicant. Further detailed information has also been provided regarding investigation into surface water infiltration and measures to control drainage within the site and to improve the existing drainage problems whereby the local water catchment and drainage ditches surrounding the site have led to localised above ground flooding events.
- 4.69 The Lead Local Flood Authority (LLFA) has carried out a detailed assessment of the information submitted and has subsequently confirmed that following amendments, the revised drainage strategy addresses the concerns raised in their previous responses and will result in a reduced rate and volume of run-off to the local ditch system and surrounding water network than at present.
- 4.70 Subsequently the drainage strategy follows the drainage hierarchy as set out in the Building Regulations and NPPF and proposes to discharge surface water into an existing Anglian Water sewer, having investigated and discounting surface water infiltration and connection to a watercourse.
- 4.71 Calculations have been supplied for the pipe network and attenuation features to demonstrate that there will be no above ground flooding and attenuation in the form of oversized pipes and tanked permeable paving has been specified to meet the required standards.
- 4.72 The surface water drainage system (including the attenuation system) is proposed to be constructed to adoptable standards by Anglian Water and a full maintenance plan is recommended to be conditioned and provided at the detailed design stage. Anglian Water have assessed the revised proposals and have subsequently confirmed that the proposed method of surface water disposal into an existing Anglian Water sewer is acceptable.
- 4.73 In summary, whilst it is acknowledged that concerns have been raised by residents and the Parish Council regarding drainage, it is noted that the LLFA considers that the above strategy provides a sustainable approach to surface water management, that will limit surface water run-off in accordance with the requirements of the NPPF and also result in a reduced rate and volume of run-off to the local ditch system and surrounding water network than at present.
- 4.74 Subject to conditions recommended by the LLFA, to implement the surface water drainage scheme in accordance with the agreed details, and to provide details of the maintenance and management regime for all aspects of the drainage scheme, the surface water drainage strategy is considered acceptable and accords with the NPPF and JCS Policy 1.

Foul water

- 4.75 The foul drainage from this development is in the catchment of Long Stratton Water Recycling Centre. A Statements and Conditions Report has been prepared by Anglian Water which confirms that the water recycling centre at present has available capacity for the proposed flows. If the

applicant wishes to connect to the sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. Subject to entering into such an agreement, the impacts on the foul water are considered acceptable and accords with Policy 1 of the JCS.

Ecology and Protected Species

- 4.76 This application is supported by a Preliminary Ecological Appraisal (Middlemarch Environmental, March 2017). The proposed site consists mainly of arable fields and as such, has limited ecological value. It is noted that there are some features which should be retained and / or enhanced as part of the development, and the substantial area of public open space offers a sizeable opportunity for biodiversity enhancement. It is recommended that a Biodiversity Management Plan (BMP) is conditioned providing details of enhancements for biodiversity, which includes a planting schedule for the open spaces.
- 4.77 The aforementioned report is also supported by a Preliminary Bat Roost Assessment on the mature trees to be affected by proposed works. The County Ecologist has assessed the report and has concluded that it is fit for purpose and that of those trees to be removed / pruned they have negligible potential for roosting bats apart from one, which had low bat roost potential. Subject to the imposition of conditions recommended by the County Ecologist, which include retaining and enhancing all boundary features, installing bird and bat boxes and providing details of enhancements for biodiversity for the area of open space, the proposals are considered acceptable.

Heritage assets

- 4.78 The proposed development site lies in an area which has been subject to much fieldwalking and metal-detecting, producing Roman pottery and Roman to medieval metal finds. It also lies close a major Roman road and the medieval core of Long Stratton. Consequently there is potential that heritage assets with archaeological interest (buried archaeological remains) could be present at the site and that their significance will be adversely affected by the proposed development.
- 4.79 The Historic Environment Service has recommended that this be subject to a programme of archaeological mitigatory work in accordance with National Planning Policy Framework. Subject to an appropriately worded condition, which requires details of a site investigation and post investigation assessment to be completed, it is considered that the proposals are acceptable.
- 4.80 There are no listed buildings located within the application site that will be affected by the proposals and the site is not within a Conservation Area.

Contamination

- 4.81 Policy DM3.14 has regard to development and contamination. The Council's Environmental Management Officer has confirmed that they have no objections to this planning application and has recommend that any approval includes a condition or informative note that in the event contamination that was not previously identified is found, it must be reported in writing immediately to the Local Planning Authority and a report submitted that includes results of an investigation and a risk assessment along with a remediation scheme to be agreed and carried out. Subject to the imposition of a condition or an informative note to have regard to contamination, it is considered that the proposal is acceptable and in accordance with policies DM3.14 of the South Norfolk Local Plan.

Sustainable construction/renewable energy

- 4.82 Policy 1 and 3 of the JCS require the sustainable construction of buildings and water conservation in addition to requiring 10% of the predicted energy requirements to be delivered by on site decentralised and renewable or low carbon energy. Precise details and compliance with the policy will be secured by condition.

Summary of environmental role

- 4.83 Having due regard to the above assessment, it is considered that the scheme fulfils the requirements of the environmental role in the context of the NPPF, as well as providing benefits through the provision of public open space and ecological enhancements. It is therefore considered that the proposal accords with the requirements of the NPPF and also 1 d) of Policy DM1.3 of the South Norfolk Local Plan and JCS.
- 4.84 In relation to sustainable development it is considered that on balance the proposed development is acceptable in this instance and will not result in any adverse impact that would significantly and demonstrably outweigh the benefits of housing on this site.

*Other issues**Secured by design*

- 4.85 The Committee will note that the Police Architectural Liaison Officer has indicated that should the developer wish to achieve a 'secured by design' award, which is a voluntary award aimed at designing out crime in new developments, that a number of minor revisions would be required to the scheme achieve this. Since the award is voluntary and the design and layout of the development is satisfactory and achieves good levels of surveillance, the development is considered acceptable in this regard.
- 4.86 With regards to detailed comments regarding the proposed public open space and the potential timber boardwalk over the wetland zone and a trim trail, it is considered that these matters can be adequately dealt with as part of a condition requiring detailed designs of the open spaces to be agreed at a later stage as part of the landscape, ecology and management plan.

*Other considerations**Section 106 Agreement and Community Infrastructure Levy (CIL)*

- 4.87 The application is liable for CIL and a liability notice would be issued with any consent granted. Should consent be granted a S106 would need to be entered into to cover Affordable Housing and open space.

Financial Considerations

- 4.88 Under Section 143 of the Localism Act the council is required to consider the impact on local finances. This can be a material consideration but in the instance of this application the other material planning considerations detailed above are of greater significance.

5. Conclusion

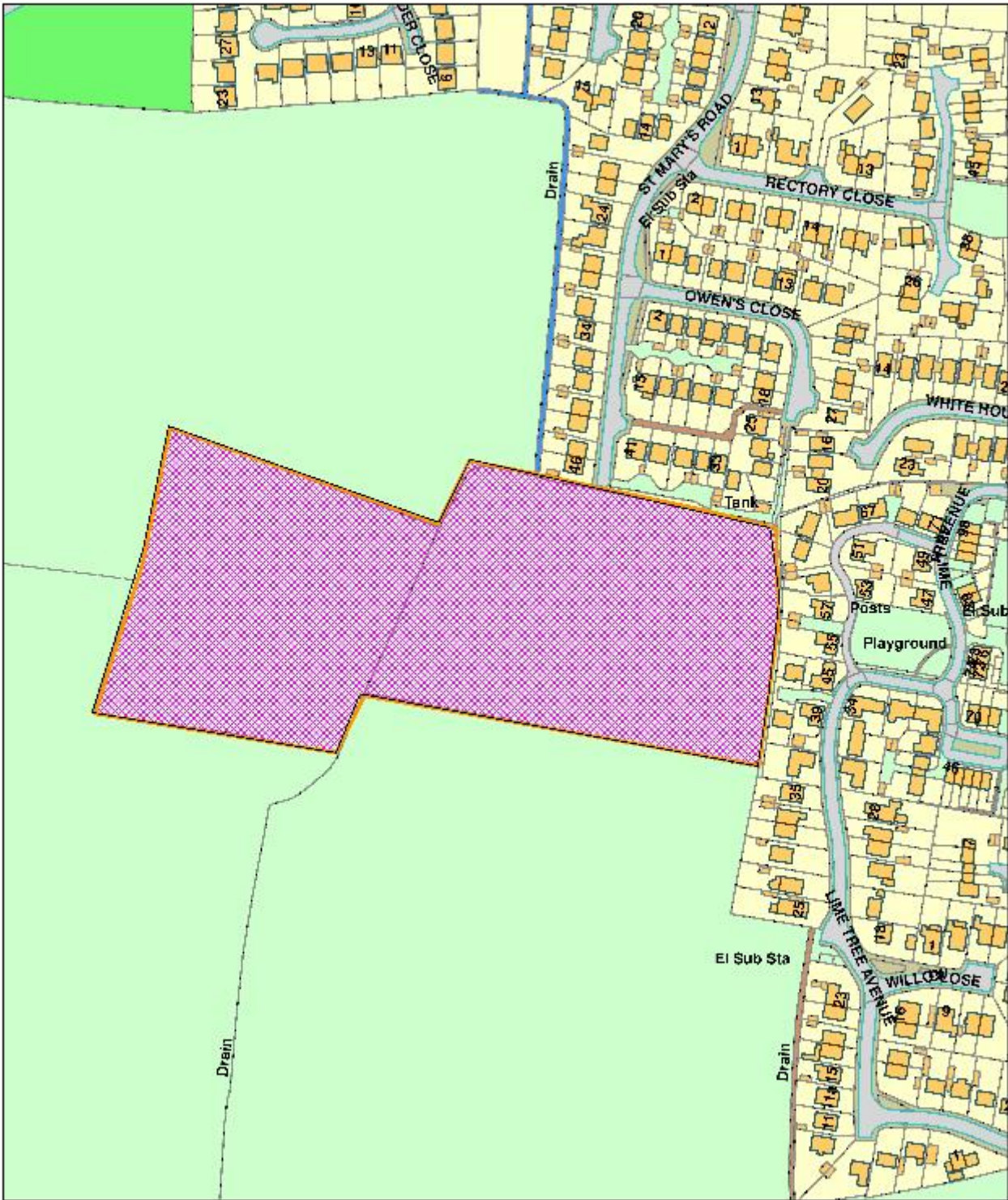
- 5.1 The proposed development of the site would satisfy the three roles of sustainability (economic, social and environmental). It is evident that the proposal complies with the requirements of the relevant National and Development Management policies identified above. Whilst it is acknowledged that the proposal results in the loss of an oak tree near the access from St Mary's Road that has been identified as having moderate value, I consider that in this instance the overriding social and environmental benefits outweigh its loss and that greater weight should be afforded to the requirements of highway safety and access to the site which are required to develop in this location.


- 5.2 No harm has been identified which is at a level that would significantly and demonstrably outweigh the benefits identified by the development of the site and of housing delivery and the substantial area of public open space, notwithstanding that the benefits of housing are diminished as a result of the SHMA 5 year supply figures as a material consideration. Accordingly, the application satisfies the requirements of Policy DM1.1 of the Development Management Policies and Para 11 of the NPPF (2018).
- 5.3 The application is therefore recommended for approval subject to the imposition of conditions.

Contact Officer, Telephone Number Chris Watts 01508 533765
and E-mail: cwatts@s-norfolk.gov.uk

2017/0810


Appendix 1



 **Scale 1:2,500**

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South Norfolk Council, Cygnet Court, Long Stratton, Norwich, NR15 2XE Tel (01508) 533633



Enclosure 2. Tree Strategy Plan

Street and Avenue Trees



Focal Point Trees



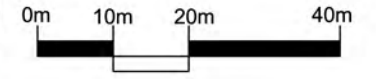
Native Trees



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Key:

- Application Site Boundary
- Existing Trees
- Proposed Street and Avenue Trees
- Proposed Focal Point Trees
- Proposed Native Trees

Suggested Tree Palette

Suggested Street and Avenue Trees

- 'Streetwise' Field Maple (Acer 'Streetwise')
- Purple Birch (Betula p. 'Purpurea')
- Fastigate Hornbeam (Carpinus 'Fastigiata')
- 'Evereste' Apple Tree (Malus 'Evereste')

Suggested Focal Point Trees

- Sweetgum (Liquidambar styraciflua)
Semi-mature, girth: 20-25 cm, height: 5.0-5.5m

Suggested Native Trees

- Field Maple (Acer campestre)
- Birch (Betula pendula)
- Hornbeam (Carpinus betulus)
- Crab Apple (Malus sylvestris)
- Sweet Cherry (Prunus avium)
- Oak (Quercus robur)
- Rowan (Sorbus aucuparia)

The proposals present an opportunity to introduce at least 45 new trees within the context of the residential site. These will mitigate for the trees proposed to be removed and also create a high quality landscaped setting for the proposals. This does not include the opportunities for new woodland planting as part of the open space proposals to the west.

| REV | DATE | NOTE | DRAWN | CHK'D |
|-----------|------|------|-------|-------|
| REVISIONS | | | | |



TITLE
Land at St Mary's Road, Long Stratton Tree Strategy Plan

CLIENT
Orbit Homes

| SCALE | DATE | DRAWN | CHK'D |
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| 1:1000@A3 | OCT 2018 | SFB | AM |
| DRAWING NUMBER | | REVISION | |
| 6033 / TSP / ASP6 | | - | |