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| **Clerk to the Council: Mrs Patricia Kirby**  |
| Mr B BurgessBroadland District CouncilThorpe Lodge1 Yarmouth RoadNorwich NR7 0DU12 April 2016 |

Dear Mr Burgess

**Hybrid Application 20151770 –**

**Royal Norwich Golf Club, Drayton High Road, Hellesdon, NR6 5AH**

Thank you for consulting Hellesdon Parish Council on the above planning application. As you are aware, this application has caused strong feeling within the Parish and there are grave concerns regarding the proposed loss of this existing area of green space (albeit private green space) and the substantial levels of new development proposed.

It is the case that the applicant has had some limited amount of pre-application engagement with the Parish Council concerning this application, however to date this engagement has been cursory in length and unproductive in terms of impact on the proposal. The Parish Council have worked hard to ensure that its residents are aware of and can comment on the proposed development. It is disappointing that these efforts have not been matched by the applicant and it is clear that the level of community engagement in respect of this application falls considerably below that envisaged by the Broadland District Council Community Involvement Protocol.

Whilst it is regrettable that the applicant has not been more proactive in engaging with both the Parish Council and the local community we represent, and surprising Broadland have not requested at least an acknowledgement of the requirements of the protocol from the developer, Hellesdon Parish Council understand the importance of maintaining a productive dialogue throughout the planning process and, on this basis, we would invite the applicant to engage in further discussions with us in order to address some of the serious concerns expressed in this letter of objection.

The development proposed raises a number of areas of concern, and we have set these out thematically in order to structure our response and make clear our concerns and the reasons for our objection to this application:

**Highways**

It is the case that the highway network surrounding the application site is currently constrained by two significant areas of traffic congestion, these areas being the junction of the A1067 and Middleton’s Lane and the junction of the A1067/A140.

The applicant’s own Transport Assessment (TA) highlights that the junction at A1067 Middleton’s Lane already operates above theoretical capacity level (para 7.4, page 24) and states that pressure on this junction is projected to increase up to the year 2020 irrespective of any new development due to increases in background traffic.

The same TA also acknowledges that the A1067/A140 junction is expected to be operating at capacity by 2020, even without additional traffic being added either by the new development proposed in this application, or other proposed allocated sites in the locality.

These already heavily congested junctions are a cause of significant inconvenience for people travelling through our parish into or out of Norwich, but for people who live in the parish the impacts associated with these overloaded junctions are significant and adverse:

* delayed journey times for even the simplest of journeys into or out of the city from the parish
* increased risk of accidents at these overloaded junctions (the applicant’s TA recognises a specific issue with rear end shunt accidents at the A1067/A140 junction) and
* the impact on local air quality caused by the regular and lengthy traffic queues.

In short, it is manifest that the existing highway network struggles – and regularly fails – to cope with existing traffic levels and cannot accommodate the levels of projected increased traffic which would occur even without the development proposed in this application and other proposed allocated sites.

In response to this existing unsatisfactory functioning of the highways network the application proposes to add traffic from 108 new dwellings before carrying out any highways improvement works. So, starting with an additional 32 Heavy Goods Vehicle movements per day during site clearance, and ending with traffic from 108 new dwellings, the proposed development will force ever more traffic through what is acknowledged to be an already insufficient local highways network including a junction with a documented traffic safety problem, without proposing any improvements to the two key junctions which are integral to the effective functioning of the highway network in the locality of the application site.

Furthermore, whilst the applicant does acknowledge the emerging policy requirement to address existing issues at the traffic light controlled junction, there is no specific information as to when any improvement work associated with the proposed development would be carried out – the applicant simply states that the developer will ‘*provide an upgrade as part of the remainder of local plan allocation’.*

A review of the draft S106 agreement suggests that there is no intention at this stage to secure the delivery and timing of these highway improvement works in this legal agreement and, as such, the Parish Council consider the addition of traffic from 108 new houses would have a significant adverse impact upon the satisfactory functioning and safety of the highway network. Furthermore, the current proposal for 1000 new houses with no certainty at all regarding the timing of delivery of highway improvements (other than the fact that at least 108 houses will be lived in before any highways improvements works are carried out) cannot be considered to

accord with either emerging or adopted local planning policies, or guidance within the NPPF.

In defence of the proposed development, the most positive thing the applicant’s own TA can muster is that, when traffic generated by the proposed development of 108 houses is taken into account, queuing at the A1067/A140 junction will be *expected to reach the next junction at Hellesdon Hall Road’ (*para 7.14, page 29). Given that this would represent almost half a kilometre of queuing traffic this is not a particularly encouraging claim.

In summary, the applicant’s own TA identifies the existing infrastructure as either operating in excess or projected to operate in excess of theoretical capacities and acknowledges that there is a specific safety issue at the A1067/A140 junction. The development initially proposes to add traffic from 108 new homes to this existing

inadequate highways network and, eventually, traffic from a further 900 additional homes. Highways improvements to the key junctions are not proposed to solve the existing problems, nor ameliorate the impact of the proposed 108 new homes and

whilst improvements to one of these junctions (A1067/Middleton’s Lane) are referred to by the developer, no timescale is set out for these improvements.

In addition to the above matters, and with reference to the outline element of this hybrid application (i.e. the remaining 890 homes outside the full planning application), the Parish has concerns regarding the impact of the proposal on the existing ambulance station situated on Hospital Lane. This station accommodates ambulances and rapid response vehicles which operate on a 24/7 basis and was only reopened in May 2015 when it became clear that operations from the East of England Ambulance Service NHS Trust’s Longwater site were struggling to achieve the required response times.

The base on Hospital Lane is a strategically important site serving not only the Parish of Hellesdon, but providing emergency responses to the wider North Norfolk area. It is not clear that the operational requirements of the site – in particular the need to gain quick, unobstructed access to the major road network – have been considered in the application and this apparent lack of consideration is compounded by the proposal to site new homes and a new school along this road plus the roundabout and associated delays. The Parish Council would be interested to know if the applicant has had any pre-application contact with the East of England Ambulance Trust to discuss these operational implications and whether the Trust have been made aware of the proposals by the local planning authority.

Having regards to the above, the Parish Council object to the proposed development on the grounds that the proposal in its current form is contrary to emerging local policy SP31-02, policy TS3 of the adopted DM DPD and the provisions of paragraph 32 of the NPPF. The proposal would have significant adverse impacts on the satisfactory and safe functioning of the highway network, and would cause significant adverse impacts to existing and future residents of Hellesdon Parish.

If, contrary to the opinions of the Parish Council, the Local Planning Authority is minded to approve the application, then we strongly consider it should require the developer to deliver highways improvements to the key junction(s) in tandem with the development of 108 new houses, with a clear and deliverable timescale/set of

trigger points laid out for any additional improvements associated with the development of the remaining 890 dwellings.

**Education**

The original site proposed by the Developer to allocate 2 hectares of land at the corner junction of Hospital Lane, Middletons Lane and the Drayton High Road, adjacent to a large telecommunications mast and an over capacitated road junction with noise and pollution, was seen by Hellesdon Parish Councillors and parishioners as folly.  Who on earth could think this site appropriate?  There was a very strong view that the new school should be situated on the same side - the eastern phase - as existing schools already accessible could share facilities such as sports and recreational amenities.

Concern is also raised about the intake statistics produced by Norfolk County Council (NCC) Education Department. The legal agreement - section 106 does not require the developer to assist the High School financially to allow school extension and/or provision. It was also noted that the current Headmaster has publicly stated that this development will have a detrimental impact on the school in terms of capacity and accommodation, which are already compromised.

The NCC Officers have met and decided a preference for the Primary School siting, which has been repositioned, but still remains on the western site and now adjacent to a newly proposed large busy roundabout junction and opposite a Blue Light active ambulance station.

Councillors and residents remain of the view that the school remains in the wrong site allocation, and is by virtue fragmented from existing Hellesdon Schools, and lacks the opportunity for site sharing.

**Sustainability**

The applicant asserts that this is a sustainable location well suited to residential development. In addition, it is understood that this very large, all residential development does not include any element of local centre provision (space for small shops, cafes etc.) due to its proximity to existing, established retailers, against which smaller units would struggle to compete.

The parish does not accept these arguments and would like to see the scheme incorporate some elements of mixed use – possibly small retail units, community uses etc. However, notwithstanding this point, if the sustainability of the site is the justification for such a large, solely residential development, then it is considered that the sustainable connections to the rest of the parish – including services, facilities and existing open space – are unacceptably poor.

There is little information regarding proposed cycle routes through the site, and connectivity to existing routes – for example the Norwich Cycleway Purple Route which runs immediately adjacent to the site – is limited.

The Guidelines for Development set out in emerging policy require that ‘*Any development should support the safe movement of cyclists and pedestrians accessing or exiting the site. Permeability through the site will be important for*

*maximising pedestrian/cycle links to local shops, schools, jobs etc. and access to bus services’*.

The proposed development appears to pay little regard to integrating with and promoting use of existing sustainable routes across the Parish and, due to the cul-de-sac nature of much of the design, offers little in the way of permeability and new routes through to existing services and facilities in the parish and nearby.

What impact the development will have on existing sustainable transport routes will be largely detrimental – new access roads crossing the existing shared use path along Drayton High Road will adversely impact on those who regularly use this sustainable route between the parish and the city, and it is noted that the proposed refuges to (inadequately) mitigate for this interruption are sub-standard for shared (i.e. pedestrian and cyclist) use.

Consequently, the Parish do not consider that the development satisfies the Guidelines for Development proposed by the emerging site-specific policy and, for this reason the application in its current form should be refused

**Affordable Housing**

Policy 4 of the adopted Joint Core Strategy requires developments of over 16 units to deliver 33% affordable housing and identifies a tenure mix of 85% affordable rented properties to 15% shared ownership, subject to a consideration of site-specific issues which could impact on the viability of the proposal.

The full application element of this application seeks consent for 108 houses and proposes 28 new affordable units and a tenure mix of 60 % affordable rented propitious to 40% shared-equity units. This is not policy compliant: compliance with policy CS4 would deliver 36 new affordable homes.

At paragraph 5.3 the submitted Planning Statement appears to propose this lower than policy compliant percentage and non-policy compliant tenure mix across not only the full matters application (108 houses), but also across the remaining 890 units proposed.

Whilst the Parish recognise that national policy guidance requires a consideration of viability, and that this is reflected in the provisions of policy CS4, departure from policy requirements must be justified. It is not clear that any detailed assessment of project viability (either the reserved matters or outline elements) has been submitted with the application and, with reference to the failure to comply with policy, the Planning Statement appears to identify the provision of a single unit (75sq m) to accommodate a D1 (health facility) use (paragraph 5.3).

It is unclear how the provision of a single unit of D1 use can be used to justify significant under provision of affordable housing on the reserved matters scheme alone, resulting in the loss of 8 affordable new homes. It is even less clear how the same justification can be used for the remainder of the scheme (let alone under provision of 63 affordable homes across the proposed remaining 890 house scheme).

In addition to the above, the Parish Council are aware that no NHS health care provider is in place to use the building and that those which have been approached

have declined the offer. Given this, it is unclear what the use of this building will actually be and so what weight can be afforded to its provision, when considering the considerable shortfall in affordable housing proposed in this application.

The Parish Council understand that allocation of land for a new school, off-site highways improvements and other costs can impact on the viability of a scheme. However, if these elements are proposed as mitigating factors in the significant shortfall in affordable housing provision the case for this should be made by the developer as part of the application and be made available for consultees to consider. In its present form, the application falls substantially short of compliance with adopted policy and there appears to be insufficient justification for this shortfall, the result of which is fewer affordable homes available to existing and future residents of the parish. We are aware that Broadland District Council typically apply a local connection criterion for a proportion of the affordable homes, so the loss of new affordable houses associated with the proposed under-provision is an issue which directly impacts on the parishioners of Hellesdon.

For this reason, the Parish Council consider that the application fails to comply with policy CS4 of the adopted Core Strategy, and should therefore be refused.

**Design**

The Parish Council has concerns with both the indicative site layout proposed in the outline application, and with the detailed design of the proposed 108 house scheme.

Considering first the 108 house development, it is acknowledged that the revised drawings submitted are an improvement over the originally submitted scheme and, in particular, the revised design of the affordable housing and three storey element are welcomed.

Taking a wider look at the proposed development as a whole, the Parish Council consider the proposal to be too high in density resulting in poor design, poor connections between areas of green space (considered further below) and a poor standard of amenity for future occupiers.

Proposed allocation PS31-02 indicates an area of 48.1ha and suggests that this site could deliver between 800 and 1,000 new homes across this area. The policy map detailing the proposed allocation is copied below for ease of reference.



The key accompanying the policy maps suggests the area shaded red is allocated for housing whilst the area in green could accommodate a ‘community facility’.

The planning application submitted excludes the spur of land at the southern end of the site – an area of approximately 5ha – and, consequently, proposes the maximum number of houses envisaged by the emerging policy on an area which is 5ha (over 10%) smaller than the proposed allocation. This aspiration to achieve a high density, whilst retaining some trees considered to be of landscape importance, results in an unacceptably over-developed site which (as a consequence of the high levels of housing proposed) fails to accommodate the levels of public open space required by adopted planning policies (a matter considered in more detail below).

The Parish Council consider that this results in an unacceptably overdeveloped site, with development densities in excess of that envisaged by the emerging policy and excessive, given the policy aspirations to create sustainable communities where residents can enjoy a good standard of amenity. Surely it is the case that a development site which uses approximately 90% of the land in the proposed allocation should only seek to deliver 90% of the housing envisaged by that allocation? This being the case, an approximate density of development should seek to achieve between 720 and 900 new dwellings, rather than the 1000 proposed in this application.

The exclusion of this southern section of land raises an additional concern regarding the potential future use of this land. Does the proposed allocation reserve this part of the site for community facilities, as suggested by the policy map? This is unclear, but seems unlikely, given the substantial residential development now proposed on the land shaded green to the immediate north. Consequently, does the smaller, higher density site proposed in this application leave additional land for additional future residential development on this part of the proposed allocated site? In a parish which has already seen a substantial level of new development both delivered and planned, and in an area where existing infrastructure and facilities already struggle to cope with demand, this potential for subdivision of the proposed allocated site and intensification of development to increase densities is of significant concern to the Parish, and further clarity is sought in this regard.

Notwithstanding this uncertainty, and mindful of the points set out above, the Parish Council do not consider that the application submitted is of a high standard of design and, as such, does not comply with the requirements of adopted planning policy GC4.

**Open Space**

Policies EN3 and RL1 of the adopted DM DPD require development proposals to deliver public open space in accordance with standard tariffs set out in the polices. These tariffs dictate both the amount (ha) and type (formal play space, allotment, open space etc.) of open space to be provided, with levels determined by population size.

Considering drawing MP01 Rev A which shows public open space both within the full and outline parts of the proposed development, it is notable that a considerable percentage of the proposed public open space is existing woodland and, from site

visits and knowledge of the site, the Parish Council is mindful that within these wooded areas there are many areas of steep slopes.

Whilst the Parish Council is keen to support the retention of mature trees (and notwithstanding the previously stated objections to the application), this should not be at the expense of provision of useable areas of public open space which are accessible to all and enable a variety of activities. It is noted that the overall open space proposed within the development totals almost 15.5ha. However, at present, the scheme appears to be substantially short in provision of children’s play space and space for formal recreation.

Considering the requirements of both adopted and merging planning policies in respect of public open space, adopted policy RL1 requires provision of space for formal recreation equating to at least 1.68ha per 1,000 population and provision of children’s play space at least 0.34ha per 1,000 population: this being the case, a development of this scale should provide in excess of 4ha of formal public open space. In addition, the development guidelines accompanying the proposed allocation of the site state that ‘*The site should provide on-site recreation to encourage healthy lifestyles’*.

It is the case that neither the detailed design nor the outline proposals accommodate formal recreation space in accordance with these existing or emerging policies. This is a matter of particular importance to the parish of Hellesdon where there is a documented under provision of formal areas of recreation space to serve the existing population. For example, the district-wide assessment of public open space provision carried out by Broadland in 2007 (Strategic Leisure Ltd, 2007) established that the parish accommodated 0.43ha per 1,000 population; this was the lowest level of provision in any parish within the district and is substantially lower than the level of provision current planning policies seek to achieve (1.68 ha per 1,000 population).

The situation in terms of formal recreation space provision within 2007 will only have deteriorated since 2007, as the area of formal recreation space (provided by a single site, the Recreation Ground) has remained static and the parish population has increased. Based on the 2011 Census the parish population was 12,900, this results in provision of 0.37ha per 1,000. Given the level of permitted and planned new development within the parish since 2011 the population will continue to increase, whilst the provision of formal recreation areas remains static. It is considered that exacerbating this under-provision through not only consenting to further new dwellings (and therefore further increasing the population) but by allowing the applicant in this instance to fail to satisfy the policy requirements in respect of provision of formal open space, it is contrary to local and national planning guidance and would be to the considerable detriment of existing and future residents of the parish.

With reference to drawing MP01 Rev A, it is further noted that the applicant has identified all areas which are not being developed as public open space. As a result, the indicative site layout plan shows a number of areas of ‘public open space’ which are, in fact, simply narrow strips of land at the edges of development blocks. The amenity, landscape and ecological value of these strips is very questionable and, in reality, they are unlikely to be able to be put to any positive use. To count these areas (which, cumulatively, may add up to a sizeable area)

towards the public open space provision does not appear to accord with policy aspirations to provide good quality, useable areas of public open space.

Having regards to the above, and notwithstanding the Parish Council’s objection to the development proposed, it is considered that if the development is to proceed there must be some additional provision for formal areas of public open space within the scheme – football pitches with appropriate changing and clubhouse facilities would, for example, deliver a real benefit to the existing and future residents of the Parish and help to mitigate the impact of the proposed development.

As a final point with regards to provision of public open space, the fragmented nature of the areas of public space identified on the indicative site-layout plan and the site plan for 108 new dwellings, combined with the lack of permeability and sustainable routes across and through the site, result in a ‘patchwork’ of small, unconnected areas of green space. This is disappointing in a master plan which has the opportunity to create strong connections between high quality areas of public open space. The fragmented and poorly connected nature of the public open space as shown on the indicative site-layout plan and the plan for 108 houses leads the Parish Council to question whether the proposed provision is of sufficient quality to mitigate off-site recreational impacts on the nearby Wensum Valley Site of Special Scientific Interest (situated less than 200m from the application site), and it would be helpful to clarify whether or not the Local Planning Authority will carry out an Appropriate Assessment of the application to consider impacts on both the Wensum Valley SSSI and Sweet Briar Road Meadows SSSI.

Considering the above, the Parish do not consider that the development proposed satisfies the requirements of either policy EN3 or RL1 of the adopted DM DPD, nor the guidelines for development as set out in the emerging site specific policy. Accordingly, it is considered that the application should be refused in its current form.

**Other Matters**

A number of parishioners have raised concerns regarding capacity within the foul water system and its ability to accommodate any new development without detriment to existing properties. This is an area which already suffers from problems with the foul water system and we would ask officers of the council to consider carefully whether the applicant has provided sufficient information to address concerns in this regard.

Concern has also been expressed regarding the proposals for control of surface water flows across the site and, in particular, the potential for surface water and associated debris to be directed west of the site and onto Low Road and the properties beyond. Again, we would ask that officers confirm they are satisfied that this has been appropriately modelled and managed as part of the application.

**Summary**

In summary of all of the above, the Parish Council object to the proposed development of this site and maintain considerable concerns regarding impact on highways, sustainability issues, design issues, provision of affordable housing and provision of open space. The application in its current form falls short of policy

requirements in a number of regards and, on this basis; the Council do not consider that the development should be granted planning consent.

Notwithstanding this objection to the development, there are a number of matters – in particular the issue of provision of public open space where the development fails to satisfy adopted and emerging policy requirements and in a location where the need for a good level of provision of formal recreation space is particularly acute – which the Parish Council feels it could help to resolve if the applicant were willing to work with the Parish Council, and we would welcome a continued dialogue with both the officers of the Local Planning Authority and the applicants in this regard.

This is a substantial development proposal in our Parish and one which would see the loss of a rare pocket of open green space in the locality. In this context the Parish Council has a duty to set out the concerns of parishioners and to object to this development which in its current form represents an unacceptable proposal as it fails to satisfy the requirement of both adopted and emerging local and national planning policies and guidance.

The Parish Council still remain vehemently of the view that Persimmon must adhere to the NPPF requirement on formal recreation land allocation and with that in mind we insist the 4.12 hectares of land is provided within the curtilage of the outline application site

Yours sincerely



Clerk to the Council