Land East of the Memorial Hall, Brundall

Planning Statement

Prepared by Barton Willmore LLP on behalf of Quantum Land (Brundall) Limited

August 2017
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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of Quantum Land (Brundall) Limited (the Applicant) to be submitted in support of a ‘hybrid’ application seeking outline planning permission for up to 170 dwellings, with the inclusion of Phase 1 – a detailed application for 23 dwellings, as follows:

“Outline planning application with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 for which details of all matters in relation to the 23 dwellings within that Phase are provided. Development to comprise: up to 170 dwellings (Use Class C2 and C3), and a community/sports pavilion (Class D1 and D2 use), a Country park, formal outdoor sports provision, access, and other earthworks and engineering works. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans”.

1.2 A copy of the Development Parameters Schedule and Plans has been replicated at Appendix 1 to this Statement.

1.3 The planning application proposals are submitted after extensive pre-application discussions with Broadland District Council (BDC), Brundall Parish Council, Blofield Parish Council, the Memorial Trust, and through engagement events with the local community and other key stakeholders.

1.4 The Proposed Development would deliver a number of public benefits, namely:

- The development of site in a sustainable village location, that seeks to positively contribute to the village and wider area and meet the principles of the Brundall Neighbourhood Plan and the Joint Core Strategy and Broadland Local Plan, by successfully co-locating Later Life housing, market housing and affordable housing, along with formal sport and informal recreational uses on the site;
- The delivery of up to 170 new homes - a significant contribution towards housing requirements in a District which cannot demonstrate a 5-year housing supply - including the detailed Phase 1 element which enables the speeding up of delivery whilst the reserved matters relating to the
outline planning application are submitted and approved. If approved, housing delivery could commence immediately.

- A mix of unit sizes are proposed including Later Life units – an identified local need – and affordable family dwellings;
- The delivery of a policy compliant level of 33% affordable housing (eight of the 23 units proposed within the detailed Phase 1 scheme are affordable); and
- A significant amount of publicly accessible open space, including opening up the northern portion of the site as a Country Park (approximately 7ha) with footpaths and cycleways through the Park enabling public access through the site and connecting to adjoining publicly accessible land and routes. The provision of a Sports Park incorporating both informal open space and formal football and cricket pitches, a pavilion and play area (a total of approximately 3ha) – all to be delivered with Phase 1.

1.5 The purpose of this statement is to assess the planning issues raised by the development proposals on the application site (“the Application Site”). It also identifies and describes the key opportunities presented by the proposed development (“the Proposed Development”) and assesses the proposals against relevant planning policies, and its conformity with the Development Plan.

1.6 This Statement provides information to support and justify the proposals in planning policy terms and is structured as follows:

- Section 2 – The Application Site, History and Background;
- Section 3 – Pre-Application Consultation;
- Section 4 – The Proposed Development;
- Section 5 – Planning Policy Context;
- Section 6 – Assessment of Relevant Planning Issues;
- Section 7 – CIL and S106 Heads of Terms; and
- Section 8 – Conclusion and Summary of Benefits.

**Applicant Information**

1.7 Quantum Group is a specialist property developer, care provider and investment manager. The Group creates vibrant, affordable healthcare and residential
communities and delivers secure long-term real estate investments. Quantum’s vision is focused on three fields:

- Affordable housing – a registered provider of affordable housing on a mission to revolutionise retirement living in the UK;
- Specialist elderly care – Quantum designs, builds and operates private care homes focused on delivering clinical excellence; and
- Strategic development – providing expertise and funding infrastructure to facilitate the delivery of locally-led communities, including residential development.

**Vision**

1.8 The primary objectives for the site are:

- To realise the provision of new public open space in accordance with the broad principles set out in planning policy applying to the site. It is recognised the provision of such open space has been a community aspiration for over 20 years.

- In meeting the council’s immediate housing needs to create a successful and sustainable place for people to live, and play, that can be enjoyed by the community and wider public;

- To provide a mix of new dwellings that are fit for purpose and meet an identified local need, with the potential inclusion of Later Life housing;
- To deliver an appropriate density of dwellings, as well as to deliver affordable housing;
- To provide recreational opportunities for both the new and existing community; and
- To open up the site and allow increased public access, through the provision of a substantial new Country Park.

1.9 To deliver this vision, Quantum has employed an experienced team to work collaboratively to prepare and deliver the Brundall proposals.
1.10 The boundary of the planning application site is shown on the plan enclosed at Appendix 2.

1.11 This planning application is being submitted in ‘hybrid’ form. In other words, it is an outline planning application, with one area – in this case termed ‘Phase 1’ – submitted in detail. This is to enable the Applicant the flexibility to begin delivering the approved Phase 1 development (responding to the urgent need to deliver new housing in the district immediately) whilst submitting their reserved matters details to BDC for approval for the remainder of the site, whether as one or in further phases.

1.12 The outline application is supported by a series of Development Parameter Plans (and accompanying text), which control the extent and location of the proposed development, as well as identifying the areas within which landscaping and recreation areas are to be located. In addition to these ‘control’ documents, the Applicant has also prepared a series of Framework Plans. These Framework Plans do not form part of the planning application, and are purely illustrative, but they show one – but not the only - way in which the proposed development could come forward in the context of the Development Parameters.

1.13 The Applicant has held a series of meetings with both BDC and with the Parish Councils and Memorial Hall Trustees regarding these proposals. In addition to that, the Applicant undertook a Community Engagement event in July 2016, at the Memorial Hall in Brundall, to share its proposals for the site with the local community. The Statement of Community Involvement submitted in support of this application sets out the information shared with the community, the questions asked in respect of the proposed scheme, and the content of the responses received.

1.14 In addition, the Applicant undertook a formal pre-application consultation with BDC. The response from BDC is contained at Appendix 3. The Applicant also sought a Screening Opinion from BDC, pursuant to Part 2 (Regulation 5) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). BDC considered the request, and confirmed that the proposed development is not considered to be EIA development. The Screening Request and BDC response are contained at Appendix 4.
Documents for Approval

1.15 This Planning Statement is intended to be read in conjunction with the following formal planning application documents:

- The Planning Application Form;
- The land ownership and agricultural holdings certificate;
- The Development Parameters Schedule and Plans;
- CIL Additional Information Requirement Form, and Form 2 (Claiming CIL Exemption or Relief); and
- The Design and Access Statement.

1.16 In addition, the following supporting information is submitted:

i. Landscape and Visual Impact Assessment, prepared by Barton Willmore;
ii. Transport Assessment, prepared by Rossi Long Consulting;
iii. Ecological Appraisal, prepared by Hankinson Duckett Associates, accompanied by separate Protected Species reports (Bats, Reptiles, Water Voles, Otters and Great Crested Newts);
iv. Flood Risk Assessment, prepared by Rossi Long Consulting;
v. Flood Modelling Assessment, prepared by Evans Rivers and Coastal;
vi. Utility Assessment, prepared by Rossi Long Consulting; and
vii. Statement of Community Involvement (SCI), prepared by Quantum Developments.

Summary

1.17 Planning permission is sought for the development of the Land to the East of the Memorial Hall in Brundall. A full package of planning application documents is submitted in support of the proposals, which are submitted in ‘hybrid’ form – for outline planning permission with a detailed Phase 1 – based on a set of fixed Development Parameters. The application is submitted following a series of consultations with BDC (including a formal pre-application request), the Parish Council’s and the local community, along with the submission of request for a Screening Opinion from BDC.
2.0 THE APPLICATION SITE, HISTORY AND BACKGROUND

Site Location and Description

2.1 The site is located on land to the East of the Memorial Hall in the village of Brundall (see Appendix 2). It is located about 200 metres to the north of the Brundall village centre, and about 500 metres from Brundall railway station, which is located at the western end of the village off Postwick Lane. The site extends to 17.4 hectares.

2.2 The site is bounded to the south, east and west by an established residential area, and to the north by Norfolk Premier Golf at Blofield which lies beyond the Run Dike. The site is currently in agricultural use (Grade 2 classification) and is bounded by fences, hedgerows and trees, plus the Run Dike to the north. The site slopes gently downwards from south to north.

2.3 The Brundall Memorial Hall and the play/skate area are located adjacent to the western corner of the site, and are located between the site and the adjacent residential area. The Hall and play/skate area are accessed from Links Avenue, which runs north from The Street (which is the central ‘High Street’ of the village). There is a Post Office, local shops and pub/restaurants located on The Street. To the south of this main thoroughfare is the Brundall Primary School.

2.4 The southern and eastern boundaries of the site, along Westfield Road and Highfield Avenue, are characterised by a mixture of established residential properties, dating primarily from the 1950’s to 1970’s. A Church is located in the eastern corner of the site, accessed from the single carriageway lane off Highfield Avenue. A public right of way (Bridleway) runs along the southern boundary, to the rear of the properties on Westfield Road, and along the eastern boundary, adjacent to the properties off Lackford Close. The properties to the west of the site are more modern than those to the south and east of the site.

2.5 Brundall Road borders the north-east corner of the site, and this is where the new primary vehicular access to the application site is to be created. An emergency access will be created along the southern boundary. Two locations have been identified that are both suitable. The routing will be agreed as part of the reserved matters approval stage.

2.6 Brundall is located approximately 7 miles to the east of the city of Norwich, and is linked to the city by the A47 Yarmouth Road, which runs to the north of the
villages of Blofield and Brundall. The Postwick Park and Ride is located close to
the western end of the village (on the eastern edge of Norwich) and as referred
to above, the village of Brundall benefits from two railway stations. There are
regular trains to Norwich and to Great Yarmouth (and other stations), with
journey times as follows:

- Norwich – 10 to 20 minutes; and
- Great Yarmouth – 20 to 30 minutes.

Planning History

2.7 There is limited relevant planning history relating to the application site. The
only relevant application is one made in 2005 for the change of use of part of
the application site from agricultural land to a playing field use. The application
was made by Brundall Parish Council, and related to the land shown on the plan
at Appendix 5. The change of use was approved, subject to conditions. The
land was and is not owned or in the control of the Parish Council.

2.8 In 2010, a further application was made by Brundall Parish Council to extend
the time limit for the implementation of the approved 2005 change of use
application (reflecting the ownership position). The application was approved in
May 2010, giving the Parish Council a further three years in which to implement
the permission. In 2013, the Parish Council made a further application to extend
the time limit for the implementation of the change of use. Again, this was
approved by BDC, for a further three years to June 2016.

2.9 In February 2017, a further full planning application was approved by BDC for
the change of use of the same area of land from agricultural use to recreational
use. Again, the application was submitted by the Parish Council, and the change
of use was granted for a further three years. The delegated Officers Report and
Decision Notice are contained at Appendix 6.

Summary

2.10 The site is in a sustainable village location close to the regional centre of
Norwich, and is surrounded on three sides by established residential areas.
Part of the site benefits from full planning permission for the change of use of
the land from agricultural use to recreational use.
3.0  **PRE-APPLICATION CONSULTATION**

3.1 This section sets out details of the pre-application consultation and community involvement that Quantum Developments has undertaken prior to the submission of the planning application. This section should be read in conjunction with the accompanying SCI, also prepared by Quantum Developments.

3.2 The applicants have engaged with BDC, the two local Parish Council's, the Memorial Hall Trustees, and the Statutory Consultees during the design process and will continue to engage with all parties once the 'hybrid' planning application is submitted.

3.3 Details of the pre-application engagement held with the above organisations is summarised below within the supporting Reports listed at paragraph 1.16 above.

**Broadland District Council**

3.4 The Applicant has been in discussions with BDC in respect of the proposed development for around 12 months. The discussions with BDC began at a stage when there was not a fixed scheme for the site, and the principles of the proposed development were the main focus of the discussions. As time has evolved, the Applicant has moved on to develop the detail of the scheme and to share with BDC the basis of the Development Parameters and also the illustrative Framework Plans.

3.5 In November 2016, the Applicant wrote and asked formally for a written and considered view from BDC regarding the development proposals for the Brundall site. A copy of the letter to BDC is enclosed at Appendix 10.

3.6 In February 2017, BDC responded to the Applicants request, and issued their response to the pre-application request. A copy of that response, and the attachments to it (formed of responses from the relevant consultees), is contained at Appendix 3.

3.7 The response from BDC highlighted the development plan policies to which the Applicant needs to have regard in respect of the proposals, and sought clarity in respect of the provision of formal recreation versus Country Park provision within the site. In addition the response from BDC focussed on six key elements of the scheme and its acceptability, as follows:
i. The proposed development is outside the settlement boundary;

ii. The residential element of the proposed development comes within the area allocated for recreational use in the Site Allocations DPD under policy BRU3;

iii. The proposals suggest that the 3ha of formal recreation within the 4.9ha allocated under BRU3, would result in an under-provision of 1.9ha of that allocation (albeit the wider country park proposal would "over provide" on policy);

iv. Under policy RL1 of the Development Management DPD, and based on an average of 170 3B dwellings, a total of 0.72ha of formal recreation space is required, and 0.14ha of children's play area are required in respect of the proposed development;

v. Under policy EN3 of the Development Management DPD, and again based on an average of 170 3B dwellings, a total of 1.7ha of informal open space and 0.07ha of allotments are required on respect of the proposed development; and that therefore;

vi. The fact that the recreational provision of the proposed development equates to a considerable overprovision in recreational terms is a significant ‘material consideration’. The LPA sought clarity in terms of how this is provided and secured in order for the weight of such a material consideration to be realised.

3.8 We will consider these points further in Section 6.0 below.

Brundall and Blofield Parish Council's

3.9 The Applicant has been engaged in discussions with the Parish Council’s regarding the proposed development for around 18 months, but primarily with Brundall Parish Council as the site is within that civil parish.

3.10 The Parish has long had a non-ownership interest in the western portion of the application site, as referred to above in Section 2.0. The Parish Council has made a series of planning applications for the change of use of the land shown at Appendix 5 from agricultural use to recreational use. The last such application was approved by BDC in February 2017. In addition the Parish, with approval from the Memorial Hall Trustees, assist in looking after and running the Memorial Hall and play area adjacent to the western corner of the application site.
3.11 The Applicant has been in discussions with the Parish Council both regarding the principle of the proposed development, the most appropriate type of development for the village in order to meet identified needs, and in addition about the role that the Parish can play in the long-term in relation to the significant provision of recreational open space – both formal and informal – within the application site. It is intended that the design and layout of the new public open space, totalling over 10ha, will be decided by the local community. The area designated for formal sports has the potential to provide a new football pitch and a new cricket pitch, depending upon the layout chosen. The new Country Park will be prepared and laid out in accordance with the proposals contained in the planning application. It is intended that the formal and informal open space land (10ha) will be transferred to BDC, and ultimately to the Memorial Hall Trustees and the Parish Council to run and maintain for the community’s benefit and as an extension to the existing facilities that they have to offer in Brundall.

3.12 The Parish Council (as a leading community focus) has yet to ultimately decide what form the formal recreation provision might take. On the basis that the planning application is being made in outline, and therefore that the details of the open space and its layout and function are yet to be designed in detail, the community can come to a view at a later stage in relation to the provision that is made. However, as stated above, there is ample space provided in order to enable the provision of a grass football pitch, with a cricket pitch overlaid on part of it – a dual use arrangement. A new MUGA would also be provided and planned in association with the existing or redeveloped Memorial Hall facilities, community facilities for Brundall can be substantially qualitatively and quantitatively be improved. The series of illustrative Framework Plans show the different ways in which the open space could be configured.

**Public Engagement**

3.13 The accompanying SCI, prepared by Quantum Developments, details the consultation undertaken with the local community. The Applicant is very committed to engaging and consulting with the local community, and has a dedicated community engagement team who manage this key part of the process. The SCI sets out in more detail the consultations undertaken and the detailed feedback. This is summarised below.
Methods of Consultation

3.14 The consultation process has involved a series of one-to-one meetings with local stakeholders and residents, including the Brundall and Blofield Parish Council and the Memorial Hall Trustees, along with a two-day public exhibition event. At the public exhibition, held in July 2016, the development proposals were shared with over 400 local people who attended.

3.15 The SCI includes copies of the Exhibition Boards which were presented to the those attending, the content of which included the background to the Applicant, information about the Application Site, design principles and the layout of the Scheme, access strategy, proposed recreational provision, and the potential benefits to the Community.

Feedback Received

3.16 Generally, the proposals were well received by the public. A total of 257 comment forms were received from the public consultation event. The proposals for the Country Park and Sports Park, plus the provision of accommodation for older people were generally well received. Some concerns were raised, namely:

- The possible impact on services and infrastructure locally;
- Increased traffic and congestion in the area;
- The scale of development and its impact on the environment;
- Loss of greenfields and views; and
- The impact of construction (albeit temporary).

Summary

3.17 The comments received at the consultation event have been noted – both positive and negative. Some of these concerns are addressed in Section 6.0 below, where we have summarised the findings of the technical reports which accompany this application. Following the consultation, the following changes to the Proposed Development were made:

- Inclusion of the Parish Playpark at Meadow View into the planning application boundary to increase the options available for post Phase 1 scheme layout;
• Reduction in proposed dwelling numbers from 250 to 170 dwellings;
• Introduction of the detailed scheme for Phase 1, and the inclusion of detailed house designs;
• Demonstration of how the provision of a cricket pitch alongside and overlapping with a football pitch could be achieved; and
• Demonstration of how the provision of a pavilion building providing amenity space to be run by both Memorial Hall trustees and Parish Council could be achieved.

3.18 The Applicant, and their team, will continue to engage with BDC, the Parish Council's, Statutory Consultees, the local community and the general public throughout the determination period of the planning application.

3.19 Further details of public consultation can be found in the accompanying SCI.
4.0 THE PROPOSED DEVELOPMENT

4.1 This section provides an overview of the Proposed Development and the key aims and objectives. The supporting Design and Access Statement should be read in addition to this Statement as it provides a more detailed description of the scheme, the site’s setting and how the scheme proposals have evolved through the design process.

4.2 The application seeks outline planning permission with a detailed Phase 1 element, for the following:

“Outline planning application with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 for which details of all matters in relation to the 23 dwellings within that Phase are provided. Development to comprise: up to 170 dwellings (Use Class C2 and C3), and a community/sports pavilion (Class D1 and D2 use), a country park, formal outdoor sports provision, access, and other earthworks and engineering works. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans”.

4.3 The proposed development is an extension to Brundall to ‘round off’ the natural and logical extent of the village on its northern side. A defensible natural boundary will be created, formed by the topography and Run Dike. The proposals will deliver much needed housing for the District, and in an area where the provision of homes for older people has been highlighted as an aspiration. The scheme will deliver a policy compliant level of affordable housing, both within Phase 1 and ultimately across the whole site, along with the provision of a significant area of open space formed of a country park along with more formal recreational provision. This open space contribution will be gifted to the local community in perpetuity, via the District Council and ultimately the Memorial Hall Trustees and Brundall Parish Council.

4.4 In summary, the Proposed Development will deliver the following:

**Residential** - A high quality designed residential scheme providing up to 170 residential dwellings (Classes
C2 and C3) of up to 11m in height above ground level.

- Provision of up to 62 of the residential units being delivered as Later Life homes (Class C2 use).
- Provision of on-site affordable housing, at a policy compliant 33%, and of tenures to be agreed with BDC.
- A range of dwelling sizes.
- Provision of car parking spaces per residential unit, in accordance with BDC’s and NCC’s standards.

**Community/Support Uses**

- Provision of a pavilion (Class D1/D2 use) for use by the Memorial Hall Trustees and the Parish Council in conjunction with the recreational space being provided.

**Landscape & Amenity Space**

- Over 10 hectares of publicly accessible recreational open space, including the provision of a new grassed football pitch and cricket pitch.
- Creation of a new country park.
- Opening the site up to enable increased public access both east to west and north to south.
- Provision of a MUGA.

**Residential Provision**

4.5 The residential element of the scheme occupies the eastern part of the site, with the country park located along the northern boundary of the site in a linear style, and the remaining ‘Sports Park’ area and Pavilion being to the east of the proposed residential development, and adjacent to the existing community uses. The illustrative Framework Plans are enclosed at Appendix 7, and show the potential disposition of these uses within the site, based on the development Parameters.

4.6 The majority of the scheme is submitted in outline form, so there are no further details proposed at this time in respect of the mix of the units proposed. However, the Development Parameter Plans dictate the location and massing of the dwellings. Plan 2, enclosed at Appendix 8, indicates the location of residential development within the site, and the building height proposed. Residential development is to be a maximum of 11m high, above ground level.
4.7 Within Phase 1 (boundary shown on the plan enclosed at Appendix 9), there are a total of 23 dwellings proposed, which can be broken down as follows:

- **AFFORDABLE UNITS:**
  - 2 no. 1 bedroom flats;
  - 3 no. 2 bedroom houses; and
  - 3 no. 3 bedroom houses;

- **PRIVATE MARKET UNITS:**
  - 2 no. 2 bedroom houses;
  - 7 no. 3 bedroom houses; and
  - 6 no. 4 bedroom houses.

**Affordable Housing**

4.8 Phase 1 has been designed as tenure blind, therefore at the point of the submission of the planning application, the tenure provision of the affordable housing units within this Phase has not yet been determined. We will discuss and agree this with BDC once this application has been submitted.

4.9 However, in terms of the overall quantum, the Proposed Development will meet BDC’s affordable housing policy by providing 33% affordable housing. As the remainder of the scheme proposals are submitted in outline only, the proposed tenure mix and split of unit sizes is subject to further discussion and agreement with BDC.

**Appearance and Design**

4.10 The majority of the Proposed Development is submitted in outline form only, with the details of design and appearance to be provided through future reserved matters applications.

4.11 Phase 1 of the Proposed Development has been submitted with full details, as part of the ‘hybrid’ scheme. The design and materials of the residential units have been influenced the local environment. The material palette has been developed and inspired by the site’s immediate and wider context.

4.12 The new buildings will be predominately brick, interspersed with black timber cladding, and a limited number of rendered units. Roof materials will consist of pantiles or plain clay tiles. Driveways will be a mixture of red/brown or grey block paving. Further details of the design of the proposals are contained within the Design and Access Statement.
Public Open Space

4.13 The provision of new areas of open space for local community recreation is a significant feature of the Proposed Development. The scheme will deliver the following:

- A Country Park, extending to over 7ha, and creating a linear park for informal recreation, with footpaths and cycleways linking the existing Memorial Hall and play/skate park to Brundall Road, and to Links Avenue;
- A new Sports Park extending to a total of over 3ha, comprising two distinct areas - formal recreation space in the form of a football pitch and cricket circle, and an open informal area of recreation with a pavilion and a MUGA; and in addition
- The gifting of all of the open space being provided to the District Council. It is expected that the land will ultimately be gifted to the Memorial Hall Trustees and Parish Council, in perpetuity, for use by the new and established local community.

Access and Parking

4.14 There are two existing points of vehicular access to the site – at Links Avenue, and off Highfield Avenue. The former serves the Memorial Hall, which is located adjacent to the western corner of the site. The Highfield Avenue access is a single carriageway lane which serves as an access to the Westfield Mission, an evangelical church. In addition to this, a public right of way runs along the southern boundary of the site from east to west, along the rear boundary of the properties on Westfield Road.

4.15 The Proposed Development will see the creation of a new vehicular access from Brundall Road. This new access will serve the whole of the new residential development, and provide vehicular access to the ‘Sports Park’ area in the western part of the application site. In addition, an emergency access will be located in the south-western corner of the site in one of two locations identified.

4.16 The proposed development will also enable, by creating new areas of recreational open space for the new and established communities, a new network of footpaths and cycleways from east to west through the site, and to the south into the existing community of Brundall.
4.17 Car parking within the site will be provided in accordance with BDC’s Parking Standards SPG, with a worst-case assumption for 100% Class C3 use, which is on average as follows:

- 1B unit – 1.5 spaces;
- 2B/3B units – 2 spaces;
- 4B units (or more) – 3 to 4 spaces.

**Phasing**

4.18 The application is submitted in a ‘hybrid’ form, with the site covered by an outline application, but with the inclusion of a ‘Phase 1’ detailed element. This Phase 1 element of the scheme comprises of 23 residential units (including 8 affordable units), and is accessed from the main access road off Brundall Road. The delivery of the Phase 1 element will also include the transfer of the land required for the provision of the Country Park, and the Sports Park, to BDC. We will agree with BDC, in advance of the transfer of the land to them, the phasing of the provision of the planting, ponds, footways and cycleways within the Country Park.

4.19 The application has been submitted in this format in order to be able to immediately assist in delivering new homes to the community, and to provide certainty of the delivery of the new public open space and sports pitches.

4.20 Further phase(s) will then follow Phase 1, and will be dealt with via reserved matters.
5.0 PLANNING POLICY CONTEXT

5.1 This section sets out the planning policies that are relevant in considering the redevelopment of the Brundall site.

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications must be determined in accordance with the relevant development plan, unless material considerations indicate otherwise. The planning application proposals will therefore need to be considered against the relevant development plan policy documents and other material considerations.

National Planning Policy

5.3 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. The publication of the NPPF in March 2012 resulted in the deletion of the Planning Policy Guidance Notes and Planning Policy Statements that previously formed the National planning policy context. In addition, the Government published the national Planning Practice Guidance (PPG) on 6 March 2014 (as updated) to complement the NPPF.

5.4 One of the main principles running through the NPPF is the ‘presumption in favour of sustainable development’ (paragraph 14). This means that development proposals which accord with an up-to-date development plan should be approved by the determining authority without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

5.5 Paragraph 17 of the NPPF sets out the core planning principles, which includes:

- “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas,
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
• actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
• take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”

5.6 Paragraph 28 refers to the need to promote a strong rural economy and to promote leisure developments that benefit rural communities as well as promoting local services and community facilities, including sports venues. Paragraph 47 identifies the need for LPA’s to identify and regularly update a supply of deliverable sites to provide 5 years’ worth of housing against their housing requirements. Paragraph 50 of the NPPF makes clear that LPA’s should also identify a range of housing to reflect local demands, including in more rural areas (paragraph 54). In circumstances where an LPA cannot demonstrate a 5-year housing land supply, the provisions of paragraph 14 of the NPPF become a relevant consideration. In the absence of a 5-year housing land supply, any policies which previously restricted or constrained the delivery of housing can no longer be applied. Instead the provisions of paragraph 14, which indicate a presumption in favour of sustainable development and the granting of planning permission unless any adverse impact of doing so would significantly and demonstrably outweigh the benefit when assessed against the policies of the NPPF as a whole, should be the test.

5.7 Paragraph 73 identifies the important contribution that high quality open spaces, and sport and recreation opportunities, make to the health and well-being of communities.

Statutory Development Plan

5.8 The Development Plan comprises:

- The Joint Core Strategy for Broadland, Norwich and South Norfolk, Adopted March 2011 (with Amendments adopted January 2014);
- The BDC Development Management DPD (August 2015);
- The BDC Site Allocations DPD (May 2016); and
- Brundall Neighbourhood Plan 2016-2026 (May 2016).
5.9 The Joint Core Strategy (JCS), which forms part of the Development Plan, is the overall strategic plan for the area in which BDC and the Brundall site is located. The JCS sets out an integrated framework for the delivery of development in the Norwich and surrounding north and south Norfolk region up to 2026. The JCS seeks to enhance the environment within the local area whilst planning for the delivery of housing and jobs within the Region.

5.10 Strategic local planning policies are set out in the BDC Development Management DPD, and the Site Allocations DPD, with the western portion of the Application Site being identified in the latter for recreational use (Policy BRU3 – of which more later).

5.11 The Brundall Neighbourhood Plan (BNP) was adopted in May 2016 and forms part of the Development Plan in respect of the Application Site.

5.12 A review of the key planning policies contained within the Development Plan documents is provided below.

Other Relevant Documents

5.13 The JCS Annual Monitoring Report 2015-2016, published in January 2017, provides us with the most up-to-date formal picture of the position in relation to the delivery of housing in relation to the targets, and the 5-year housing land supply within each of the Districts and within the Norwich Policy Area (NPA). We will consider this further below, and in Section 6.0. In addition, we have also considered the following adopted Supplementary Planning Documents (SPD’s):

- Landscape Character Assessment SPD (September 2013); and
- Recreational Provision in Residential Development SPD (April 2016).

Relevant Planning Policies

Joint Core Strategy (JCS)

5.14 The Spatial Vision for the JCS area includes:

- Access for all to housing that meets their needs;
• Excellent public open space, sport and recreation opportunities, with improved access to the countryside; and
• The Key Service Centres, including Brundall, should generally accommodate small to moderate housing developments of between 50-200 dwellings.

5.15 Policy H4 of the JCS identifies the requirement for 33% of units on any site involving the development of 16+ dwellings to be affordable. Of this, the JCS states that 85% are to be available for social-rent, and 15% for intermediate tenures. It is recognised that there will be a need to discuss this tenure mix with BDC and ensure that this represents the most up-to-date need in respect of the site, and in fact the longer-term need (paragraph 5.30) is estimated to be for 60% social rented and 40% intermediate across the JCS area, with the higher level of social rented demand likely to be in the urban area of Norwich rather than the more rural areas. The JCS recognises that there will be a need to assess the required tenure mix on a site-by-site basis.

5.16 Policy 6 of the JCS seeks to encourage the concentration of development close to essential services to encourage travel by foot and by bicycle as the primary means of travel, with public transport being used for trips further afield.

5.17 In terms of the strategy for growth in the NPA, Policy 9 states that of the minimum of 21,000 dwellings to be delivered within the plan period in the JCS area, 2,000 dwellings are to be delivered in the Broadland area. We will come on to discuss whether this target for the Broadland area is being met. As referenced above, Brundall is identified as a Key Service Centre within the JCS (Policy 14). Land is to be identified for 50 dwellings within the village of Brundall, although additional dwellings may be allowed in order to ensure that the allowance set at Policy 9 (for the BDC area) can be delivered.

5.18 Brundall is identified as a Key Service Centre due to its ability to serve the needs of local residents through the services available within the village. However, paragraph 6.51 makes clear that there is a need to improve on the limited recreational facilities available in the village.

5.19 Any development within the village should not have a detrimental impact on the Broadland SPA, Broadland RAMSAR or Broads SAC. We will discuss the relevant ecological considerations in Section 6.0 below.
5.20 The Brundall policy map within the SADPD identifies the Application Site as being outside the settlement limit, and with the western portion of the site allocated under Policy BRU3 as land for recreational purposes. Table 2 of the SADPD identifies that land has been allocated for a total of 486 dwellings to be delivered in the Key Service Centres of Blofield and Brundall in order to achieve the JCS requirements to 2026, with Brundall to provide 50 of these dwellings, subject to the caveats previously stated above.

5.21 As referred to above, the western portion of the Application Site (approximately 4.9ha) is allocated for recreational open space under Policy BRU3, with the guidelines for that allocation including:

- The need to comply with other Development Plan policies;
- A vehicular and pedestrian access from Links Avenue;
- Potential requirement for a pedestrian crossing at The Street;
- Adequate landscaping and green infrastructure to be provided;
- SUDS and appropriate pollution control measures to be put in place;
- Archaeological investigation may be required; and
- The land is to be used for a mixture of formal and informal recreational uses.

5.22 More generally, Policy GC2 of the DMDPD does not prevent development outside the settlement limit, but does state that ‘Outside of these limits development which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan.’

5.23 Policy GC4 of the DMDPD deals with design, with the emphasis of the policy being to ensure that developments reflect the character and appearance of their surroundings, and that any new development considers the amenity of existing residents as well as providing for the amenity of the new residents. Accessibility and making the best use of the land and resources available are also cited as important considerations.

5.24 Policy EN2 refers to the Landscape Character Assessment SPD, and the need to consider the impact of development on the landscape, and to seek to protect and improve that landscape. The Proposed Development is the subject of a Landscape and Visual Impact Assessment (LVIA), which considers this
requirement further, and we will consider the findings of the LVIA further in Section 6.0 below.

5.25 In relation to the creation of wildlife habitats, Policy EN3 states that any new development of 5+ dwellings should provide 4ha of informal open space per 1,000 population, and at least 0.16ha of allotments per 1,000 population. This requirement is set out in more detail in the Recreational Provision in Residential Development SPD, with Tables 1 – 3 setting out the assumed occupancy rates, and the amount of formal and informal open space provision required based on the occupancy rates per dwelling (and subject to the size of each dwelling). The Proposed Development makes provision – within the Application Site - for both formal and informal open space, and this will be set out further in Section 6.0 below.

5.26 Policy RL1 deals with the requirements for the provision of formal recreational open space, with a requirement for provision in relation to developments of 5+ dwellings of 1.68ha of formal open space per 1,000 population, and 0.34ha of children's play space per 1,000 population. Therefore, in total, added together with the informal open space requirements set out above, there is an overall requirement of 6.18ha of open space per 1,000 population.

5.27 In reference to the potential for the provision of some dwellings within Class C2 use within the Proposed Development, paragraph 4.11 refers to the need (as identified in Policy 4 of the JCS) to provide some mixed tenure housing with care, in accessible locations, and where there is an identified need.

Brundall Neighbourhood Plan (BNP)

5.28 The BNP was prepared by the local community in Brundall, and was adopted in 2016. It forms part of the Development Plan, and represents the vision and aspirations of the community for the future of their village.

5.29 With the exception of a corridor of land along the northern boundary, the majority of the Application Site is within the BNP boundary as shown on Page 2 of the document. Section 4.0 of the BNP sets out the policies for the future of Brundall until 2026, based on the overall Vision set out in Section 3.0.

5.30 Policy 1 identifies a series of ‘gateways’ into the village which are to be improved in order to improve highway conditions for all users as well as to create a sense of place for the village. One such gateway location is Brundall
Road, where the new access to the Proposed Development is to be located. Policy 2 of the BNP recognises the importance of maintaining and strengthening the footpath and cycle links throughout the village.

5.31 The view from the Memorial Hall, located just to the west of the Application Site, towards Blofield and the church of St Andrew and St Peter is identified as important in Policy 3, and BNP seeks to enhance and protect that view. Policy 3 states that any development within such views should ensure that key features of the view can continue to be enjoyed. The LVIA which has been prepared looks at this and other views in more detail, and we will go on to consider this further in Section 6.0 below.

5.32 Policy 4 supports the provision of enhanced recreational facilities in the village including formal open space in the form of sports pitches, as well as a MUGA, flexible indoor space, a BMX track and a bowling green. The text on Page 20 of the BNP reflects the role of the western portion of the Application Site as being capable of delivering such formal sports provision.

5.33 And finally, Policy 5 of the BNP identifies the need to provide enhanced housing provision for older people within the village, in order to address what is seen as a growing demand for such facilities. The Plan highlights the need to enable older people to remain in the rural communities in which they have always lived, with the ability to remain independent but to have access to enhanced care should they require it. The Proposed Development reflects that need in terms of enabling the potential provision of some Class C2 accommodation within the Application Site.

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Summary

5.39 The planning policy framework identified above provides the basis upon which to determine the acceptability of the Proposed Development, against both the statutory development plan and other material considerations, as discussed in Section 6.0 below.
6.0 ASSESSMENT OF RELEVANT PLANNING ISSUES

6.1 This section sets out how the Proposed Development complies with relevant national, regional and local planning policy identified in Section 5.0 above.

Principle of Development

6.2 The general theme of national, regional and local planning policy is to secure sustainable development and regeneration through the efficient re-use of previously developed urban land and through concentrating development in accessible locations. This is set out in the NPPF at paragraph 14, where it states there should be a presumption in favour of sustainable development and that proposals which accord with the Development Plan should be approved without delay.

6.3 Further, paragraph 17 of the NPPF sets out 12 core planning principles that should underpin both plan-making and decision taking. Paragraph 73 identifies the important contribution that high quality open spaces and sport and recreation opportunities make to the health and well-being of communities, and this is reflected in the JCS Spatial Vision.

6.4 Both paragraph 47 of the NPPF and the Spatial Vision of the JCS make clear the importance of delivering against housing requirements, and providing housing that meets local needs, including within the Key Service Centres such as Brundall.

6.5 The Application Site is covered, in part, by the BRU3 recreational open space policy designation. The BRU3 designation extends to approximately 4.9ha, and the land is to be used for both formal and informal recreation within this area. The Proposed Development reflects those policy aims, with additional land also being provided over and above the 4.9ha in the form publicly accessible recreational open space which will be made available to the established and new local communities in perpetuity.

6.6 The Application Site does sit outside the Brundall settlement limit. However, Policy GC2 of the DMDPD makes clear that development will be permitted where it accords with a specific policy within the Local Plan, in this case BRU3 as referred to above, and if it does not result in any significant adverse impacts.
6.7 The village of Brundall benefits from an adopted Neighbourhood Plan. The Plan supports the provision of enhanced recreational space on the western portion of the Application Site, the provision of accommodation for older people with the village, the improvement of the Brundall Road gateway and the strengthening of the footway and cycleway links within the village and beyond. The Plan also highlights the need for the retention of the views from the Memorial Hall across to Blofield, to the north east.

6.8 In accordance with the policies identified above, the redevelopment of the Application Site is fully supported in principle. In land use planning terms, the Proposed Development is therefore acceptable for the reasons we will set out below.

**Housing Need**

6.9 Paragraph 47 of the NPPF requires an LPA to meet the full, objectively assessed needs for market and affordable housing in their areas, and LPA’s are required to identify and update annually their supply of deliverable sites sufficient to provide 5 years’ worth of housing, with an additional buffer of 5%.

6.10 The JCS Annual Monitoring Report 2015-2016 (published in January this year) provides the most up-to-date picture in terms of how the Region, and the Broadland area, is performing in relation to the identified housing delivery targets. Paragraph 3.20 of the Report advises that the delivery of new housing remains considerably below the annual delivery target. Paragraph 3.21 goes on to say that:

‘…..the level of shortfall is particularly acute in the Broadland part of the NPA. This is largely due to the dependence of the Broadland part of the NPA on bringing forward large strategic scale allocations in order to deliver the JCS. Its progress was inhibited as a result of the legal challenge to the JCS in addition to challenging market conditions.’

6.11 Appendix A of the Report summarises the Housing Land Supply Position at April 2016. The NPA has 4.7 years of a 5-year housing land supply, with the Broadland NPA area being able to demonstrate a 4.55-year housing land supply. This is an improvement on the position in 2015, but the Council remain unable to demonstrate a housing land supply at this time.
6.12 This lack of 5-year housing land supply provides an opportunity for new and deliverable sites like the Application Site, to come forward for consideration within the Local Plan period. In circumstances where an LPA cannot demonstrate a 5-year housing land supply, the provisions of paragraph 14 of the NPPF become a relevant consideration. In the absence of a 5-year housing land supply, any policies which previously restricted or constrained the delivery of housing can no longer be applied to a site such as this. Instead the provisions of paragraph 14, which indicate a presumption in favour of sustainable development and the granting of planning permission unless any adverse impact of doing so would significantly and demonstrably outweigh the benefit when assessed against the policies of the NPPF as a whole, should be the test.

6.13 In relation to affordable housing, the Proposed Development will deliver a policy-compliant level of 33% affordable housing on this site, in accordance with Policy H4 of the JCS.

6.14 The site is considered to be sustainable. It is not considered that there are adverse impacts that would significantly and demonstrably outweigh the granting of planning permission, particularly given the amount of recreational open space being created for the local community and the commitment to deliver policy compliant affordable housing provision. It considered the need to deliver housing more quickly within the District (for the reasons set out above), is important and that is why a ‘hybrid’ planning application is proposed in order to be able to deliver the Phase 1 parcel almost immediately, thereby assisting BDC in their 5-year supply. At the same time this will allow time to ensure that the remaining dwellings are the optimum mix to meet local need, and that they are well designed and in accordance with the Development Parameters and the principles set out in the DAS

Recreational Open Space

6.15 As set out above, the Proposed Development includes the provision of the following recreational open space:

- A Country Park, extending to 7.4ha, and creating a linear park for informal recreation, with footpaths and cycleways linking the existing Memorial Hall and play/skate park to Brundall Road, and to Links Avenue;
- A new Sports Park extending to a total of 3.1ha, comprising two distinct areas – formal recreation space in the form of a football pitch and cricket
circle (1.9ha), and an open informal area of recreation with a pavilion and a MUGA (1.2ha); and in addition

- The gifting of all of the open space being delivered within the Application Site to BDC, in perpetuity, for use by the new and established local community. It will be for BDC to decide who manages and maintains the open space on their behalf. It is our understanding that this is likely to be the Memorial Hall Trustees or the Brundall Parish Council, or a combination of both.

6.16 The DMDPD, under policies EN3 and RL1 require the following provision of open space (per 1,000 population) in respect of new residential developments

- 1.68ha of formal open space;
- 0.34ha of children’s play space;
- 4.00ha of informal open space; and
- 0.16ha of allotment space.

6.17 Table 1 of the Recreational Provision in Residential Development SPD sets out the occupancy rates applied to new dwellings, in order to assist in the calculation of the level of open space provision required on development sites. With the exception of Phase 1 of the Proposed Development, there is no fixed schedule of accommodation in terms of the anticipated size of the units to be delivered, due to the nature of the application being made in outline form. So, for the purposes of the making the calculation on the level of open space required here, we have assumed a worst-case of all the units being 5 bedrooms, and therefore having an occupancy rate of 3.5 (based on Table 1). This results in the following requirements for the maximum number of 170 dwellings proposed on the Application Site:

<table>
<thead>
<tr>
<th>DMDPD Open Space Requirement (EN3/ RL1)</th>
<th>Amount Required Based on 170 5B Dwellings Occupancy Rate ( = 595 occupants)</th>
<th>Proposed Provision Within the Application Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Formal - 1.68ha</td>
<td>1.00ha</td>
<td>1.9ha</td>
</tr>
<tr>
<td>Children's play - 0.34ha</td>
<td>0.20ha</td>
<td>-</td>
</tr>
<tr>
<td>Informal - 4.00ha</td>
<td>2.38ha</td>
<td>8.6ha</td>
</tr>
<tr>
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<td>Proposed Provision Within the Application Site</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Allotments – 0.16ha</td>
<td>0.10ha</td>
<td>-</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3.68ha</td>
<td>10.5ha</td>
</tr>
</tbody>
</table>

6.18 As the table above demonstrates, the Proposed Development represents an overprovision of open space in comparison to the DMDPD requirements. Whilst it is acknowledged that there is no measured provision for a children’s play area or for allotment provision within the Application Site, there is sufficient space to enable the provision of a play area and allotment space should that be required by the local community within the informal recreational area.

6.19 Policy BRU3 requires the provision of approximately 4.9ha of land for recreational open space in the western portion of the site, for a mixture of informal and formal open space. The Proposed Development complies with this requirement, and in totality represents an overprovision.

6.20 The Proposed Development is in accordance with the quantum of open space required under Policy BRU3 allocation for open space, and delivers open space across the site in accordance with DMDPD policies EN3 and RL1.

**Other Matters**

**Landscape and Visual Impact Assessment (LVIA)**

6.21 An LVIA has been prepared in support of the Proposed Development, and is submitted alongside this planning application. Section 5.0 of the LVIA sets out the relevant planning policy in respect of the landscape, and highlights the need to create a strong sense of place, to respond to local character, and to create a visually attractive landscape (NPPF, paragraph 58).

6.22 The Application Site is not covered by any landscape designations. However, the site is identified as being of important in relation to views, within the Brundall Neighbourhood Plan (BNP). The BNP identifies the view from the Memorial Hall looking east towards Blofield as an important view that should be protected and managed. In addition, the JCS identifies Brundall as a Key Service
Centre but highlights the importance of preventing coalescence with the neighbouring village of Blofield. Policy 1 of the JCS also states that development in areas which are not protected by national or international designations should:

‘contribute to providing a multi-functional green infrastructure network including the provision of areas of open space, wildlife resources and links between them, both off-site and as an integral part of the development’

6.23 Policy EN2 of the DMDPD advises that development should have regard to the Landscape Character Assessment SPD, and should seek to protect and enhance any gaps between settlements, sensitive views and skylines, and green areas.

6.24 The LVIA concludes that the Application Site is considered to provide a positive opportunity for the Proposed Development as the Site is:

- not covered by any national or local landscape designations;
- physically well enclosed from the wider landscape due to its low-lying position within the Run Dike valley;
- inset within Brundall's existing settlement pattern and therefore in terms of settlement morphology would not extend built form any further north than the existing settlement pattern;
- visually well screened from the wider landscape because of the intervening built form, vegetation and situation within the Run Dike valley; and
- where visible is seen in the context of existing residential properties, forming part of the northern edge of Brundall.

6.25 The careful layout and massing of the Proposed Development means that no significant detrimental impact would arise as a result of the proposals.

Transport

6.26 The careful layout and massing of the Proposed Development means that no significant detrimental impact would arise as a result of the proposals.
6.27 TA highlights the fact that the NPPF makes clear that development proposals should only be refused on transport/highways grounds where the cumulative impacts are considered to be severe (paragraph 32). Paragraph 34 of the NPPF states that development should be located where the need to travel can be minimised and where sustainable modes of travel are available. The Application Site benefits from strong sustainable transport links, with both buses and trains accessible locally, along with strong footpath links through the village – albeit that these will be strengthened by the Proposed Development. The TA highlights the fact that the NPPF makes clear that development proposals should only be refused on transport/highways grounds where the cumulative impacts are considered to be severe (paragraph 32). Paragraph 34 of the NPPF states that development should be located where the need to travel can be minimised and where sustainable modes of travel are available. The Application Site benefits from strong sustainable transport links, with both buses and trains accessible locally, along with strong footpath links through the village – albeit that these will be strengthened by the Proposed Development.

6.28 The new access route into the Application Site from Brundall Road has been discussed with the Highways team at Norfolk County Council, and is considered to be acceptable in principle, subject to seeing the detailed design. Car parking will be provided for the Proposed Development in accordance with BDC’s Parking Standards SPD, based on an assumption of 100% Class C3 use. However, it is accepted that, should C2 use be delivered on the Application Site, the parking standards may differ, and may in fact be lower than that proposed for Class C3 use. Emergency access to the Application Site will be provided from either Links Avenue or from Westfield Road.

6.29 Chapter 7 of the TA concludes that the highway network surrounding the site operates well within capacity, even with the addition of the traffic from the Proposed Development. It is therefore concluded that there is an imperceptible impact on the capacity of the Brundall Road.

Ecology

6.30 NPPF Paragraph 9 seeks positive improvements in the quality of the natural environment including achieving net gains for nature and biodiversity. The NPPF seeks to minimise the impacts of development on biodiversity and geodiversity, and sets out guidance for LPA’s to follow in bringing forward their Development Plan policy.
6.31 Policy EN1 of the DMDPD advises that development should aim to protect the biodiversity of the area and avoid the fragmentation of habitats, and support the delivery of a coordinated network of green infrastructure.

6.32 An extended Phase 1 Habitat Survey has been carried out, as well as a Badger Survey, in respect of the Proposed Development, and these reports are submitted alongside the planning application. Whilst no statutory or non-statutory designations are present within the Application Site, the Broadland RAMSAR and Special Protection Area (SPA) and The Broads Special Area of Conservation (SAC), are located within 10km of the site, with the closest part of these designated areas being within 700m of the Application Site boundary (to the south of the site). In addition, there is one National Nature Reserve (NNR) and two Sites of Special Scientific Interest (SSSI’s) within 5km of the Application Site.

6.33 The Ecological Appraisal concludes the following in relation to the designated sites:

- Birds - it is considered very unlikely that the Application Site is supportive of the type of habitat for the bird species for which the sites referred to above are designated. There are no records of SPA-related birds utilising the Application Site, the site itself is relatively small and is removed from the designated sites by some distance, and the presence of similar arable habitat in the surrounding area all support this conclusion;
- Recreational Pressure - it is considered unlikely that any significant effect arising from increased use would arise as a result of the Proposed Development due to the distance from the designated sites, the existing levels of usage found on those sites, and the availability of alternative sites for recreational use;
- Hydrology - it is considered that the attenuation measures proposed will prevent any significant effect arising from the Proposed Development, wither during construction or operation, and that Run Dike should continue to intercept any waterborne pollution arising from run-off from the site;
- Noise, Dust and Lighting - there is a negligible risk arising from noise, dust and lighting during construction or operation at the Application Site, and standard construction mitigations and avoidance measures (in a CEMP) would be sufficient to mitigate such risks; and
• Cats – it is considered highly unlikely that there would be any cat predation risks arising from the Proposed Development as the designated sites are more than 400m away, which is considered to be beyond the range of free-roaming cats.

6.34 In relation to the habitats found on the site, those of high value are in the area immediately surrounding Run Dike, along the northern boundary of the site. There are no high/medium value habitats on the remainder of the site. The areas of high value are located in the zone in which the Country Park will be created, and there are opportunities to enhance and retain the habitats in this location.

6.35 Finally, in relation to the protected species surveyed, whilst there was no evidence of badger activity during the field surveys, it is recommended that the survey is repeated 12 months from the original survey due to the presence of some limited sett-building and foraging habitats within the Application Site. It is unlikely that locally significant populations of breeding or wintering birds are present within the site. In relation to the other species surveyed (Reptiles, Otters, Water Voles, and Great Crested Newts), no adverse impacts are expected to arise and standard measures to avoid conflicts with nature conservation legislation are considered to be sufficient.

6.36 In summary, the Proposed Development has sought to minimise impacts and subject to the implementation of appropriate avoidance and mitigation measures, it is considered that the proposals will enhance the biodiversity of the site.

Flood Risk and Drainage

6.37 Government guidance requires that consideration be given to flood risk in the planning process. The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in flood risk areas, it can be permitted provided it is made safe without increasing flood risk elsewhere.

6.38 A Flood Risk Assessment (FRA) has been prepared to accompany this application, and to satisfy the requirement for all sites of this size and within Flood Zones 2/3 to be the subject of an FRA. An area of the site adjacent to the Witton Run (or Run Dike) is located within Flood Zone 2/3. The site is also
located within a Groundwater Source Protection Zone (SPZ), overlies an Aquifer, and is within an Environmentally Sensitive Area (Broads). The residential development area and access road within the Application Site are both within Flood Zone 1. These are appropriate uses in Flood Zone 1.

6.39 The FRA concludes that the risk from flooding is low or very low. The ground conditions are considered appropriate for infiltration drainage, and surface water will be managed with rainwater butts and domestic soakaways. Foul water will be connected to the public sewer system.

Utilities

6.40 The Utilities Assessment undertaken to accompany the application for the Proposed Development confirms that all utilities are available, subject to cost.

Summary

6.41 The planning issue topics identified above have been assessed against relevant planning policy to demonstrate the acceptability of the scheme. The planning application is supported by a range of technical documents, which are set out in Section 1.0 and should be read in conjunction with this Planning Statement.
7.0 CIL AND PLANNING OBLIGATIONS HEADS OF TERMS

7.1 In line with BDC’s validation requirements, the proposed contents of the Heads of Terms (HoTs) for the Section 106 Agreement planning obligations are set out below:

7.2 The proposed HoTs are as follows:

- Affordable Housing at 33% of dwellings;
- Sustainable Design and Construction;
- Residential Travel Plan;
- Transfer of recreational open space to BDC;
- Planting and setting-out of the Country Park;
- Financial contribution to the setting-out and equipping of the Sports Park;
- Management and Maintenance of Onsite Public Realm;
- Offsite Highway Improvements, to include (either financial contribution or s278 to secure):
  - Brundall Road access; and
  - Emergency access – location to be agreed with BDC; and
- S106 Monitoring Contribution.

7.3 This list of HoTs has been developed in line with the legal requirements set out in Community Infrastructure Levy Regulation 122, which states that planning obligations may only be sought where they meet all the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

7.4 These tests are further reinforced at Paragraph 204 of the NPPF. The National Planning Policy Guidance (NPPG) recognises that any planning obligations must be fully justified and evidence and should not prevent development going forward.

7.5 BDC’s CIL Charging Schedule came into effect in July 2013. The Application Site is located in CIL Zone A. The CIL rate for residential development (C3) is £95.76 per sq m for development permitted in 2017. There is no CIL charge payable for affordable housing, or for development within Class C2 use.
7.6 It is the Applicant’s view that, on the basis that the proposed development includes a significant overprovision of both formal and informal open space, that there should be exceptional circumstances to justify additional CIL relief in this instance. This is set out in the CIL forms submitted alongside this application, but in summary it is the Applicant’s view that because of the significant overprovision of open space, and the identified usage of CIL monies for green infrastructure and sport and play provision on the BDC Reg 123 list, that the proposed development should not be liable for the full CIL rates.

7.7 CIL is to be calculated in accordance with Regulation 40 of The Community Infrastructure Levy Regulations 2010 which states that CIL is payable on the proposed uplift in floorspace (GIA). The Proposed Development is being delivered in at least 2 separate phases, which means that for the purposes of CIL each phase is a separate chargeable development. In this case, the Proposed Development is being submitted in ‘hybrid’ form, enabling BDC to make a precise calculation of the CIL liability in respect of Phase 1, with a further calculation required when the reserved matters for the outline element of the Proposed Development are submitted.

7.8 It is imperative for the delivery of the two parts of the Proposed Development that any conditions or planning obligations are separate from each other, so that neither part of the development impedes the other’s delivery

Summary

7.9 The proposed development’s CIL liability will provide a significant amount of monies to contribute to the social and physical infrastructure identified in BDC’s Regulation 123 list, with 25% going directly to Brundall Parish Council. Together with the site-specific improvements identified in the s106/s278 draft Heads of Terms, any impacts of the scheme are made acceptable through the mitigation package proposed.
8.0 CONCLUSION AND SUMMARY OF BENEFITS

8.1 This Planning Statement has been prepared in support of an application seeking outline planning permission for the following, with the inclusion of a detailed ‘Phase 1’:

“Outline planning application with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 for which details of all matters in relation to the 23 dwellings within that Phase are provided. Development to comprise: up to 170 dwellings (Use Class C2 and C3), and a community/sports pavilion (Class D1 and D2 use), a country park, formal outdoor sports provision, access, and other earthworks and engineering works. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans”.

8.2 The Proposed Development which is the subject of this planning application is an extension to Brundall to "round off" the natural and logical extent of the village on its northern side. A defensible natural boundary will be created formed by the topography and the Run Dike.

8.3 It is recognised that the Application Site is not allocated for housing development in the Development Plan. It is also recognised that Brundall has been subject to substantial residential development and expansion in recent years. Some of this has been unplanned and necessary because Broadland has been unable to maintain a 5-year housing land supply in accordance with national planning policy and so non-allocated sites have been required to be developed.

8.4 In proposing further development on an unallocated site, which understandably may not be locally supported by everybody, we have thought carefully and engaged with representatives of the village to establish what type of scheme might positively benefit existing Brundall residents, over and above "just further housebuilding" and compensate for more housing.

8.5 Our combined proposals therefore comprise a single planning application delivering:

• Up to 170 dwellings and associated recreational open space and children's play equipment;
8.6 The new public open space will extend the existing Memorial Hall facilities and will be gifted to BDC, who will agree with the Memorial Hall Trustees and/or the Parish Council, the future running and maintenance of the open space for the community's benefit. The new Country Park will link to existing public rights of way and the cycle routes to extend the unbroken network.

8.7 In addition, the development will make a significant financial contribution through the payment of CIL, 25% of which goes directly to Brundall Parish Council to use.

8.8 The single planning application is in outline except in respect of the ‘1st Phase’ of homes and the new public open space. These elements are applied for in full in order to be able to immediately assist in delivering new homes to the community and to provide certainty of delivery of the creation of the new public open space and sports pitches.

8.9 Taken as a whole the proposals are considered to offer the community meaningful new facilities, to compensate the existing community for receiving further development (and to comply with the policy allocation of part of the Application Site), to assist the Council in meeting its required 5-year housing supply national requirement, and helps the local population in having much needed new homes to live in.

8.10 To be successful, it is recognised that the proposal needs to address the planning policy context and for the scheme’s details themselves to be acceptable.

8.11 In respect of planning policy, national planning policy says where authorities cannot demonstrate a 5-year housing land supply (Broadland District Council cannot - see Section 6.0 above) then LPAs should approve applications for housing (on unallocated sites) unless they are not sustainable (paragraph 14 of NPPF). In this regard the site is considered to be sustainable because it is located within easy walking distance of the village centre and its facilities, including access to public transport. Brundall village itself is considered one of the most sustainable villages surrounding and serving Norwich, and the application
proposals inherently improve access to formal and informal sport and recreation facilities.

8.12 The nature of the application itself, proposing a detailed scheme for Phase 1, directly responds to delivering housing as quickly as possible following permission, which is one of the aims of the scheme in helping to meet the shortfall in housing land supply. This is the reason why a full outline application was considered and rejected as an approach.

8.13 The technical reports supporting the planning application demonstrate that there are no technical reasons why planning permission should not be granted.

8.14 The LVIA confirms the application proposal respects the landscape context and protects the sensitive views spanning the site from Brundall to Blofield Church.

8.15 Therefore, in principle we consider national planning policy, which replaces housing land supply policies in a Development Plan (in a situation where a 5-year housing land supply cannot be demonstrated), supports the proposal.

8.16 National planning policies do not replace the Development Plan in respect of sport and recreation allocations. In the adopted Development Plan part of the site is allocated for the delivery of formal and informal open space (under policy BRU3). Our proposals comply with this allocation partly but with some proposed housing development on some of the allocation. However, the application proposals provide quantitatively more public open space than the policy allocation requires and it also proposes the equipping of the spaces, and the funding of long term maintenance, which the policy allocation does not require.

8.17 Notwithstanding this, it is accepted that the location of this open space does not accord fully with the location that the policy allocation intends and that part of the allocation on which housing is proposed means technically the application is contrary to adopted policy.

8.18 This does not mean planning permission cannot be granted. In such circumstances if a view is reached that the overall benefits of the application proposal outweigh any policy conflict then this forms the basis on which planning permission can be granted. To help inform the decision maker if this applies to this planning application a useful starting point is to consider what the policy allocation requires.
8.19 If the application proposal was to respect the sport and recreation designation, then the Applicant could pursue housing on the remainder of the site and enter into an agreement with BDC to transfer the allocated sport and recreation land (as is) to the Council. This would fully meet the sport and recreation policy requirement. The success of the application would then turn on whether the housing proposal was technically sufficient, the design acceptable, and the absence of a 5-year housing land supply proven.

8.20 To approach the site in this way is, we consider, to miss the opportunity to achieve benefits for the wider Brundall community. Whilst the allocated land would be transferred there would be no requirement to create the facilities, fund them, or maintain them. As a responsible Applicant, we do not think this would be a positive outcome.

8.21 Instead we think that in exchange for not fully respecting the adopted Development Plan’s sport and recreation allocation, the application proposal (described above) provides substantially more tangible benefits to the village and its residents. Substantially more open space is delivered, the space is laid out and facilities provided and funded, a mechanism and funding for the open space and its facilities maintenance is securely delivered. Overall, we think a collective benefit is achieved, more than what adopted plan policy seeks or can secure.

8.22 We think that the Proposed Development benefit is sufficient to outweigh the fact that the policy allocation is not strictly being locationally adhered to, and therefore there are material considerations that outweigh planning policy and enable planning permission to be granted for the scheme. The decision maker will need to come to its own view as to whether it agrees with our proposition.
LAND TO THE EAST OF THE MEMORIAL HALL, BRUNDALL

DEVELOPMENT PARAMETERS SCHEDULE AND PLANS

Prepared by Barton Willmore LLP on behalf of Quantum Land (Brundall) Limited

August 2017
LAND TO THE EAST OF THE MEMORIAL HALL, BRUNNALL

DEVELOPMENT PARAMETERS SCHEDULE AND PLANS

Prepared by Barton Willmore LLP on behalf of Quantum Land (Brundall) Limited

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<tr>
<td>Prepared by:</td>
<td>Hannah Leary</td>
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<tr>
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<tr>
<td>Authorised by:</td>
<td>Robin Meakins</td>
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1.0 DEVELOPMENT PARAMETER PLANS

1.1 The Phase 1 Full Application and Reserved Matters Applications submitted pursuant to the grant of outline planning permission shall comply with the following Development Parameter Plans (see Appendices 2-6):

Plan 1  Finished Ground Levels
Plan 2  Maximum Building Heights and Built Dev Extents
Plan 3  Recreation and Ecological Connectivity Zones
Plan 4  Recreational Zones
Plan 5  Primary Movement Corridor

1.2 The Phase 1 Full Application and Reserved Matters Applications submitted pursuant to the grant of outline planning permission shall also comply with the Development Parameter text set out below.

1.3 This application has been prepared by Barton Willmore LLP on behalf of Quantum Land (Brundall) Limited (the Applicant) to be submitted in support of a ‘hybrid’ application seeking outline planning permission for up to 170 dwellings, with the inclusion of Phase 1 - a detailed application for 23 dwellings. Planning permission is sought for the following:

“Outline planning application with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 for which details of all matters in relation to the 23 dwellings within that Phase are provided. Development to comprise: up to 170 dwellings (Use Class C2 and C3), and a community/sports pavilion (Class D1 and D2 use), a Country park, formal outdoor sports provision, access, and other earthworks and engineering works. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans”.

2.0 FLOORSPACE AND LAND USES

2.1 The development shall provide up to 20,350 sqm gross of buildings.

2.2 Within the ceilings set out in paragraph 2.1 (above) the completed development shall conform to the following restrictions set out in Table 1-3 (below):

Table 1 - Housing (Use Class C3)

<table>
<thead>
<tr>
<th>Min. No. of Units</th>
<th>Max. No. of Units</th>
<th>Maximum Floorspace (sqm gross)</th>
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<tr>
<td>100</td>
<td>170</td>
<td>20,000</td>
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Table 2 - Residential Institutions (Use Class C2)

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<tr>
<th>Max. No. of Beds</th>
<th>Maximum Floorspace (sqm gross)</th>
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</thead>
<tbody>
<tr>
<td>62</td>
<td>3,500</td>
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Table 3 - Leisure and Community Facilities (Use Class D1 & D2)

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Max. floorspace (sqm gross)</th>
</tr>
</thead>
<tbody>
<tr>
<td>D2 Assembly &amp; Leisure</td>
<td>350</td>
</tr>
</tbody>
</table>
3.0 BUILT DEVELOPMENT AREAS

3.1 Built development shall be restricted to the areas shown on Development Parameter Plan 2, with the exception of the following:

3.2 Within Recreational and Ecological Connectivity Zones (See Development Parameter Plan 3 and paragraphs 7.5), no built development will be permitted other than:

1. SUDS;
2. Fluvial flood storage;
3. Surface water attenuation;
4. Structural planting;
5. Landscaping;
6. Land sculpting;
7. Artwork, sculptures and signage;
8. Footpaths and cycleways and their associated apparatus;
9. Utilities and apparatus;
10. Development related to open space recreation;
11. Creations of roads and footpaths that may need to cross the Zones in order to provide connections for the built development; and
12. Creation of ecological habitats including wetland, meadows, scrub, conservation grassland, orchards, allotments, woodland.
4.0 BUILDING HEIGHTS & GROUND CONTOURS

4.1 The maximum height of structures and buildings are defined on Development Parameter Plan 2 and are to be measured from the finished ground level, which is controlled by Development Parameter Plan 1.

4.2 There will be no net import or export of bulk fill material, with the exception of topsoil.

4.3 The extent of excavation undertaken will need to take into account the hydrogeological setting of the development, ground water levels and the groundwater flow regime.

4.4 The extent of the parameter shown on Development Parameter Plan 1 relates to the finished development ground level and does not include any construction or temporary works operation above or below the finished development level.
5.0 RESIDENTIAL ACCOMMODATION

5.1 The range of residential accommodation within the development may extend from one bedroom apartments to six bedroomed detached houses, and all formats in between.
6.0 RESIDENTIAL DENSITY

6.1 The average density of residential development (in Class C3 defined using PPS3 methodology) of any individual Reserved Matters Application does not apply to or restrict reserved matters proposals for elderly care accommodation (which falls within Use Class C2).


7.0 GREEN INFRASTRUCTURE

7.1 Green infrastructure includes: private gardens, landscaping and structural planting; SUDS; ecological and natural areas; parkland; formal and informal recreation areas; sports pitches; orchards; allotments; equipped and non-equipped play areas; wetlands and watercourses, water features; flood risk management areas; and natural areas (maintained or otherwise). Green infrastructure may be provided on any part of the site.

7.2 Green infrastructure (excluding the ecological mitigation zones shown on Development Parameter Plan 3) must comprise a minimum of 30% of the site area when the development is complete, excluding private gardens.

Retained Features

7.3 The hedgerows and ditches shown on Development Parameter Plan 3 shall be retained, except where there is a need to remove sections of retained hedgerow in order to provide movement corridors across the site.

Recreational and Ecological Corridors

7.4 When the development is complete, Recreational and Ecological Connectivity Zones (Development Parameter Plan 3) shall be provided across the site to create a network of joined up spaces, predominantly free from development, and will:

1. Allow humans and wildlife to cross the site in north-south and east-west directions; in corridors where there will be no development other than that permitted under Paragraph 3.2;

2. Provide pedestrian and cycle links to the ‘Country Park’ and ‘formal outdoor play’ area (See Development Parameter Plan 4);

3. Retain or provide improved ecological conditions for wildlife; and

4. Provide an easement to the foul sewer on site.

7.5 Development Parameter Plan 3 shows the locations of where these Recreational and Ecological Connectivity Zones shall be located. The minimum width of the corridors within each of the zones will be a minimum of 8m with no less that 2m on
any one side of a retained hedgerow. The corridors created within each of the zones shall establish an unbroken route and be free from development (except in accordance with paragraph 3.2).

**Major Open Spaces (Development Parameter Plan 4)**

7.6 A minimum area of open space, of at least 10ha in size, shall be provided. This will be predominantly made up of the Country Park area to the north of the site and the ‘formal outdoor play’ area to the west of the site, within the zones defined on Development Parameter Plan 4. The definition of open space shall include “Green Infrastructure” as set out in paragraph 7.1 above.

7.7 The Recreational and Ecological Zones and the Major Open Spaces (see Development Parameter Plans 3 and 4) shall all be connected to form a continuous network for ecology and humans and must include variation in their width.

7.8 The Recreational and Ecological Zones and the Major Open Spaces (see Development Parameter Plans 3 and 4) may be crossed by movement corridors and associated infrastructure, including underground infrastructure.

7.9 At least 1 grass sports pitch is to be provided within the ‘Zone within which formal outdoor play is to be provided’ as identified on Parameter Plan 4.
8.0 ACCESS POINTS AND PRIMARY MOVEMENT CORRIDORS

8.1 The primary vehicular road through the site shall be within the Primary Movement Corridor as shown on Development Parameter Plan 5.

8.2 Two highway connection points from the site to the public highway will be made in the locations shown on Development Parameter Plan 5. The primary access to the site will at point ‘1’.

8.3 The primary movement route through the site will be constructed within the area shown on Development Parameter Plan 5.

8.4 Access point ‘2’ or ‘3’ will only provide access for the buildings / pavilions serving the ‘Zone within which formal outdoor play to be provided’, and emergency access for the wider scheme in required circumstances as identified on Development Parameter Plan 4. Only one secondary access will be provided - either access Point ‘2’ or ‘3’. The default proposed second access point is Point 2 - Links Avenue.
APPENDIX 2
Development Parameter Plan 1
APPENDIX 5
Development Parameter Plan 4
Dear Alex,

In respect of the informal advice requested I would ask that you have regard to the comments below [and attached] as well as those contained within the representations received [and passed to Barton Willmore] in response to the recent EIA Screening Opinion ref. 20162071.

Comments received from:

* Norfolk Constabulary Architectural Liaison officer
* BDC Design Officer
* BDC Conservation Officer (Arboriculture & Landscape)
* BDC S106 Monitoring Officer
* BDC Housing Enabling Officer

* copies attached

No comments have been forthcoming from NCC Highways

I would advise that there is now a current planning application 20162126 for Change of Use from Agricultural Land to Land for Recreational Purposes on Land East of Brundall Memorial Hall. This has been submitted by Brundall Parish Council and relates to the BRU3 recreational open space site allocation and which is supported by policies in the Brundall Neighbourhood Plan.

You need to have regard to the adopted development plan, which comprises:

- Brundall Neighbourhood Plan adopted 13 May 2016
- Site Allocations DPD adopted May 2016
- Development Management DPD adopted August 2015 – For DM DPD Policies EN1, EN3 and RL1, refer to Recreational Provision in Residential Development Supplementary Planning Document SPD April 2016 and for Policy EN2 refer to Landscape Character Assessment Supplementary Planning Document SPD September 2013
- Joint Core Strategy adopted 2011, amendments adopted January 2014

You will need to demonstrate compliance with adopted development plan policies. In this
regard I note that the zoned area for formal recreation as shown on the development parameters plans 1, 2 and 4 is significantly smaller than the BRU3 recreational open space allocation. Also, in respect of the Framework Plan (which I acknowledge is for illustrative purposes only), this is misleading as it shows more formal outdoor playing area (still less that the BRU3 allocation) than is shown of the parameters plans referred to above.

Also confusing is the reference to the country park (which is outside of the BRU3 site allocation) being used to provide formal sports pitches, which I believe to be extremely unlikely given the existing landscape and ecological features, topography and possibly drainage also.

I do not propose to go into detail on the planning policy context for the proposals (either the full or outline elements – Hybrid) but I do wish to focus on some key elements as touched on above:

1. The proposed residential development is outside the defined settlement limit for Brundall and, therefore, contrary to policy GC2 of the Development Management DPD.

2. The proposed residential development comes within the area allocated for recreational use under Site Allocations DPD policy BRU3. Part of the allocation area is within the proposed housing area, and part within the area proposed for formal recreation related to the housing. Consequently, there is a conflict with BRU3.

3. The proposal refers to approx. 3 ha for formal recreation; within the area of 4.9 ha allocated under BRU3 meaning that 1.9ha of the allocation would not be achieved. The proposal also refers to approx. 7 ha of land for informal open space / country park. There is also a small children’s play area shown within the residential area.

4. Under DMDPD policy RL1 there is a requirement for formal recreation of at least 1.68 ha per 1000 population, and at least 0.34 ha per 1000 population for children’s play space, with more details set out in the Recreational Provision SPD. Assuming that the development is for 170 x 3 bed dwellings, an estimate of the requirement under RL1 would be: formal – 170 x 42 m² = 7140 m²; children’s play – 170 x 8.5 m² = 1445 m².

5. Under DMDPD policy EN3 there is a requirement of at least 4 ha of informal open space per 1000 population; and at least 0.16 ha per 1000 population for allotments (with more details set out in the Recreation Provision SPD. Therefore, again assuming 170 x 3 bed dwellings, an estimate of the requirement under EN3 would be: informal open space – 170 x 100 m² = 17000 m²; allotments – 170 x 4m² = 680 m².

6. Consequently, in numerical terms, the proposed provision more than meets the
recreational requirement. This could be taken as a significant “material consideration” that could be balanced against the reduction in the recreational allocation, referred to in 3 above. However, the proposal is unclear about what will actually be provided i.e. is it the land, or is it laid out / equipped land; and does it include maintenance? And, to what standard will this be done? Further information will be needed on this. However, the basic policy requirements (of RL1 and EN3) could be met if the land was provided together with a commuted payment for equipping and maintenance.

In conclusion, the fact that the proposal partly achieves the recreational allocation under BRU3, and delivers more than the recreational requirement for the proposed residential development, could be a sufficient material consideration to outweigh the conflict with the Development Plan (i.e. policies GC2 and BRU3 and the Neighbourhood Plan). In order to determine this it will be necessary to know exactly what is being proposed in terms of the “provision”.

Whilst we still do not have a 5 year supply of housing land in the NPA, I am of the opinion that the informal proposal in its current form and level of detail has not demonstrated that this accords with development plan policy in terms of formal and informal open space/recreation or that if there is policy conflict in this respect that there is sufficient material considerations in terms of the package of recreational open space benefits and that at this moment in time this constitutes adverse impact for the purposes of para14 of the NPPF.

Every effort has been made to give you a helpful reply. However the contents of this email only represent officer opinion and should you decide to proceed with an application, further consideration to the proposal will be given at the application stage when the results of publicity and consultations will be taken into account. The Council will not therefore be responsible for any loss suffered as a result of anyone relying on the opinion in this email.

Please also have regard to the following:

*BT Open reach are offering for development of 30+ premises. Essentially it is Fibre to the Property (FTTP) at no cost to the developer.*

*This is obviously a huge benefit and ideally we should be encouraging developers to apply to be part of the scheme.*

*Developers need to understand that this needs to be considered at ideally the planning stage  unlike the old copper scheme that could be installed at the end of a development)*

*Please can I ask you all to push this scheme as much as possible and emphasis that it is vital developers apply early.*
Nigel Harriss
Area Planning Manager (East)
Broadland District Council

Tel: 01603 430529
Fax: 01603 430591
www.broadland.gov.uk
nigel.harriss@broadland.gov.uk

Please be aware that from 1 April 2017, Broadland District Council will charge for applications to approve details that are required to be submitted by planning conditions. The fees will be £28 per request for householder applications and £97 per request in all other cases.

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APPENDIX 4
EIA SCREENING REQUEST AND BDC RESPONSE
Dear Sir/Madam,

LAND EAST OF THE MEMORIAL HALL, BRUNDALL
REQUEST FOR A SCREENING OPINION PURSUANT TO PART 2 (REGULATION 5) OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 (AS AMENDED) (‘the EIA Regulations’)

We write on behalf of the Quantum Group in respect of the above site, the boundaries of which are indicated on the Site Location Plan attached (drawing no. 26007-03 Rev.B), and to request a Screening Opinion pursuant to the EIA Regulations as set out above.

The Site

The site is located in the village of Brundall, to the east of the city of Norwich, and to the south of the village of Blofield. The site extends to just over 17ha, and is bounded to the south, east and west by residential properties. The Memorial Hall and children’s play area are also located in the south western corner of the site. To the north the site has a more open aspect, and slopes downhill to the Run Dike, which forms the northern boundary of the site. The site is currently in agricultural use and is bordered by hedgerows and trees.

There is an existing access to the Memorial Hall and changing rooms from Links Avenue, in the south west corner of the site. In addition, there are potential vehicular access points from Highfield Avenue in the south eastern corner, and from the same road in the north eastern corner. A footpath runs along the southern boundary of the site linking Brigham Close and Highfield Avenue.

The Proposals

The development proposals for the site are as follows:

- Up to 170 dwellings in total, including later life retirement living and affordable homes;
- Main access to be from Brundall Road;
- Emergency access via Links Avenue;
Access maintained to the Memorial Hall and the existing changing facilities;
- Public footpaths and other pedestrian and cycle routes through the site;
- Provision of formal sports pitches;
- Provision of a children’s play area;
- Provision of over 10ha of country park, along with informal open space, with public access;
- SUDS to help to ensure acceptable run-off into Run Dike; and
- Retention of existing tree and hedgerow buffers.

The development proposals will come forward as a ‘hybrid’ application as follows:

1) An outline planning application – for up to 170 dwellings with associated vehicular, cycle and pedestrian access, in other words the application will be for the maximum development quantum proposed, and access. All other matters – layout, scale, appearance and landscaping – will be the subject of future approvals; and

2) A detailed application for Phase 1 – for 23 units, in the south eastern corner of the site and within the area covered by the outline planning application.

A Framework Plan will show one way in which the development proposals could come forward, and will be for illustrative purposes only. With the exception of Phase 1, the precise layout of the dwellings across the site will not be fixed, but will be controlled through the use of a series of Development Parameter Plans. These plans will control the finished ground levels, the maximum heights and the extent of the built footprint, the location of recreation and ecological areas, and the movement corridors. We are aware that your Authority has experience of working with outline planning applications which include Development Parameter Plans, and that you understand their role in controlling future reserved matters applications via planning conditions.

Request for a Screening Opinion

At the same time as seeking pre-application advice, we also write on behalf of our Client to request an Environmental Impact Assessment (EIA) Screening Opinion in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, as amended¹, from your Authority with respect to the proposed development as described above at land east of the Memorial Hall, Brundall.

In order to determine whether the proposed development is ‘EIA development’, regard must be had for the EIA Regulations and supporting Planning Practice Guidance (PPG)². EIA development is defined by the EIA Regulations as development:

“likely to have significant effects on the environment by virtue of factors such as its nature, size or location”.

EIA development falls into two Schedules of the EIA Regulations. EIA is mandatory for developments listed within Schedule 1. Schedule 2 developments require EIA if they would lead to likely significant effects on the environment. In deciding whether a Schedule 2 development is EIA development, Regulation 4(6) states:

"Where a local planning authority ... has to decide under these Regulations whether Schedule 2 development is EIA development ... the authority ... shall take into account in making that decision such of the selection criteria set out in Schedule 3 as are relevant to the development.”

¹ SI 2011/1824 as amended by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 (No. 660)
² DCLG, 2015, online access: http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/
In accordance with Regulation 5 of the EIA Regulations, and order to allow BDC to determine the need for EIA, attached to or included with this letter are a description of the site and proposed development (above), a review of the EIA Screening Criteria based on the EIA Regulations and the PPG, a completed EIA Screening Checklist, and a Site Location Plan (drawing no. 26007-03 Rev.B).

Screening Assessment

Introduction

In determining whether the proposed development constitutes EIA development, considerations should be had for the following:

- If the proposed development is of a type listed in Schedule 1;
- If not, whether it is listed in Schedule 2;
- Is it located within a sensitive area;
- It meets any of the relevant thresholds and criteria set out in Schedule 2; and/or
- Would it lead to likely significant effects on the environment.

These points are explored further in this section with reference to the EIA Regulations and supporting PPG.

Schedule 1 Projects

EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. Schedule 1 developments are large scale projects for which significant effects would be expected and comprise developments such as new airports and power stations. The proposed development is not of a type listed in Schedule 1.

Schedule 2 Projects

EIA is discretionary for projects listed in Schedule 2. If the development proposed is of a type listed in Schedule 2 then it may be classified as EIA development depending on the location of the development (i.e. if it is within a sensitive area) and/or whether it meets any of the relevant thresholds or criteria in Column 2.

Sensitive areas are defined in the EIA Regulations as:

- Sites of Special Scientific Interest and European Sites;
- National Parks, the Broads, and Areas of Outstanding Natural Beauty; and
- World Heritage Sites and scheduled monuments.

In certain cases, local designations which are not included in the definition of sensitive areas, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. Furthermore, in considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded.

The proposed development falls within category 10 of Schedule 2, ‘Infrastructure Projects’, sub-section (b) ‘Urban Development Projects’. The site is not located in, or directly adjacent to, a sensitive area and therefore the thresholds should be applied. The thresholds for such developments as set out in Schedule 2 relates to “Sites which have not previously been intensively developed” and where the “overall area of the development exceeds 5 hectares”. The area of the proposed development is just over 17.0ha and the proposals comprise 170 dwellings, both of which exceed the
thresholds. Therefore, this screening assessment has been prepared to determine whether the proposed development would be likely to result in significant environmental effects. In order to achieve this Schedule 3 of the EIA Regulations and the PPG need to be taken into account. Information on these are set out below.

**Schedule 3**

Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including: the characteristics of the development; the location of the development; and the characteristics of the potential impact. These factors should be taken into account as part of the screening process and are set out below:

**Characteristics:**
- The size of the development;
- The cumulation with other development;
- The use of natural resources;
- The production of waste;
- Pollution and nuisances; and
- The risk of accidents, having regard in particular to substances or technologies used.

**Location:**
- The existing land use;
- The relative abundance, quality and regenerative capacity of natural resources in the area; and
- The absorption capacity of the natural environment.

**Potential Impact:**
- The extent of the impact (geographical area and size of the affected population);
- The transfrontier nature of the impact;
- The magnitude and complexity of the impact;
- The probability of the impact; and
- The duration, frequency and reversibility of the impact.

**Consideration of Cumulative Effects**

Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG:

> "each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

The following committed developments have been identified for consideration for likely significant cumulative effects:

<table>
<thead>
<tr>
<th>Site Address</th>
<th>Applic. Ref.</th>
<th>Distance from Site (km)</th>
<th>Brief Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land at Yarmouth Road, Blofield</td>
<td>20160497</td>
<td>1.0</td>
<td>Hybrid application - Erection of a new employment building of 1,500 sq.m. (Class B1)</td>
</tr>
<tr>
<td>Site Address</td>
<td>Applic. Ref.</td>
<td>Distance from Site (km)</td>
<td>Brief Details</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------</td>
<td>---------------</td>
<td>-------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Land off Doctors Road, Blofield</td>
<td>20150229</td>
<td>1.25</td>
<td>Erection of 2 two storey detached dwellings</td>
</tr>
<tr>
<td>Land to the rear of Hillside, Strumpshaw Road, Brundall, NR13 SPA</td>
<td>20141816</td>
<td>0.75</td>
<td>Approval of reserved matters for the erection of 44 dwellings (pursuant to Outline approval ref. 20120167)</td>
</tr>
<tr>
<td>Land south of Yarmouth Road, and north of Lingwood Road, Blofield (Phase 2)</td>
<td>20140714</td>
<td>1.5</td>
<td>Up to 30 residential units, with associated access and public open space (Outline)</td>
</tr>
<tr>
<td>Land adjacent to 20 Yarmouth Road, Blofield, NR13 4JS</td>
<td>20141710</td>
<td>0.7</td>
<td>Erection of 30 dwellings – 20 open market and 10 affordable homes – plus associated works (Full)</td>
</tr>
<tr>
<td>Land to the north of Yarmouth Road, Blofield</td>
<td>20140758</td>
<td>0.8</td>
<td>Mixed use development comprising a retail supermarket (1,780sq.m. (Class A1 use)) and a restaurant/pub (665sq.m. (Class A3 use))</td>
</tr>
<tr>
<td>Land east of Plantation Road, Blofield, NR13 4PL</td>
<td>20141044</td>
<td>1.75</td>
<td>Residential development (14 units, of which 4 to be affordable housing) (Outline)</td>
</tr>
<tr>
<td>Land off Wyngates, Blofield, NR13 4JG</td>
<td>20130296</td>
<td>1.3</td>
<td>Erection of 64 dwellings with associated garages and amenity work, together with public open space</td>
</tr>
<tr>
<td>Garden Farm, land south of Yarmouth Road, and north of Lingwood Road, Blofield</td>
<td>20121587</td>
<td>1.5</td>
<td>Development of up to 75 dwellings, together with associated accesses, public open space and a community facility (Outline)</td>
</tr>
</tbody>
</table>

Although not committed, the following planning applications are currently under consideration by BDC:

<table>
<thead>
<tr>
<th>Site Address</th>
<th>Applic. Ref.</th>
<th>Distance from Site (km)</th>
<th>Brief Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land at Yarmouth Road, Blofield</td>
<td>20160488</td>
<td>1.0</td>
<td>Erection of 175 dwellings with public open space (Outline)</td>
</tr>
<tr>
<td>Land at Yarmouth Road, Postwick with Witton, Yarmouth Road/Berryfields, Brundall</td>
<td>20161483</td>
<td>0.75</td>
<td>Retail supermarket of no more than 2,500 sq.m., up to 192 dwellings, open space and vehicular access (Outline)</td>
</tr>
<tr>
<td>Land to the rear of 33 The Street, Brundall</td>
<td>20161394</td>
<td>0.3</td>
<td>Erection of 3 detached dwellings, and alterations to access drive (Outline)</td>
</tr>
<tr>
<td>Fox Lane, Blofield, NR13 4LW</td>
<td>20160813</td>
<td>1.25</td>
<td>Erection of 4 detached dwellings (Full)</td>
</tr>
</tbody>
</table>
Planning Practice Guidance

Paragraphs 057 and 058 of the PPG provide guidance to help determine whether significant effects are likely. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. The table below sets out indicative criteria and thresholds identified in the PPG along with some of the issues that are most likely to need to be considered in determining the whether a development is likely to be EIA development.

Planning Practice Guidance Indicative Screening Criteria

<table>
<thead>
<tr>
<th>Development type</th>
<th>Indicative criteria and threshold</th>
<th>Key issues to consider</th>
</tr>
</thead>
<tbody>
<tr>
<td>10(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;</td>
<td>Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: (i) area of the scheme is more than 5ha; or (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).</td>
<td>Physical scale of such developments, potential increase in traffic, emissions and noise.</td>
</tr>
</tbody>
</table>

The table below sets out a review of all of the above criteria and requirements, and specifically addresses the proposed development at the site.

Screening Assessment for Development on land to the east of the Memorial Hall, Brundall

<table>
<thead>
<tr>
<th>SCREENING CRITERIA</th>
<th>PROPOSED DEVELOPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. CHARACTERISTICS OF THE DEVELOPMENT</td>
<td></td>
</tr>
<tr>
<td>(a) Size of the development</td>
<td></td>
</tr>
<tr>
<td>Will the development be out of scale with the existing environment?</td>
<td>The site is located on the edge of the village of Brundall, and is surrounded to the south, east and west by residential dwellings. The site is currently not developed and is in agricultural use. The scale of the proposed development will be comparable to the existing surrounding area.</td>
</tr>
<tr>
<td>Will it lead to further consequential development or works?</td>
<td>No. The proposed development is a discrete proposal and includes all the necessary works.</td>
</tr>
<tr>
<td>(b) Accumulation with other development</td>
<td></td>
</tr>
<tr>
<td>Are there potential cumulative impacts with other existing development or development not yet begun but for which planning permission exists?</td>
<td>Committed schemes and schemes currently under consideration by BDC are set out in the tables above. The Applicant is not aware of any approved developments within close proximity of the site and that benefit from planning permission that could be considered to result in ‘cumulative effects’ over the lifespan of this project.</td>
</tr>
<tr>
<td>Should the application for this development be regarded as an integral part of a more substantial</td>
<td>No. The proposed development is a discrete project and could proceed independently.</td>
</tr>
<tr>
<td>SCREENING CRITERIA</td>
<td>PROPOSED DEVELOPMENT</td>
</tr>
<tr>
<td>--------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td><strong>(c) Use of natural resources</strong></td>
<td>The construction and operational phases of the proposed development will use resources in terms of land, water and energy as would be expected for a residential development, albeit that a significant portion of the land will remain as open space.</td>
</tr>
<tr>
<td>Will construction or operation of the development use natural resources such as land, water, material or energy, especially any resources which are non-renewable or in short supply?</td>
<td></td>
</tr>
<tr>
<td><strong>(d) Production of waste</strong></td>
<td>Construction waste would be reused and recycled where necessary. Operational waste would be disposed of in line with Norfolk County Council (NCC)/BDC requirements, and managed in accordance with the relevant legislation.</td>
</tr>
<tr>
<td>Will the development produce wastes during construction or operation or decommissioning?</td>
<td></td>
</tr>
<tr>
<td><strong>(e) Pollution and nuisances</strong></td>
<td>During the construction phase of the development, dust would be generated. Dust generation would be managed in accordance with standard best practice measures, enforced through a Construction Environmental Management Plan (CEMP) and is not anticipated to generate significant adverse effects.</td>
</tr>
<tr>
<td>Will the development release any pollutants or any hazardous, toxic or noxious substances to air?</td>
<td>There would be emissions associated with plant and vehicles during the construction phase, and from vehicles during the operation of the proposed development. The number of vehicles travelling to and from the site during the operational phase would be those associated with up to 170 dwellings, and the associated open space, albeit that the open space is being created to serve the parish of Brundall. The proposed development is for residential and open space uses, which are not associated with hazardous substances or toxic emissions to air. There is not anticipated to be a requirement to store large volumes of hazardous materials. Any such materials would be stored and handled in accordance with relevant legislation.</td>
</tr>
<tr>
<td>Is there a potential risk from leachates or escape of wastes of other products/by-products that may constitute a contaminant in the environment?</td>
<td>Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction or operational phases of the proposed development. The land uses proposed are not highly contaminative and it is not expected that there is a high risk of contaminants being released into the environment.</td>
</tr>
<tr>
<td>Will the development cause noise and vibration or release of light, heat, energy or electromagnetic radiation?</td>
<td>The potential exists for noise effects to result from the construction processes associated with the proposed development. These effects will be managed in accordance with best practice measures, implemented through the CEMP and are not anticipated to generate significant adverse effects.</td>
</tr>
<tr>
<td>SCREENING CRITERIA</td>
<td>PROPOSED DEVELOPMENT</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Lighting would be designed carefully in accordance with relevant British Standards and Institute of Lighting Professionals (ILP) (2011) Guidance Notes for the Reduction of Obtrusive Light.</td>
<td></td>
</tr>
<tr>
<td>No electromagnetic radiation, heat or energy releases are expected other than those associated with normal residential development.</td>
<td></td>
</tr>
<tr>
<td>Will the development lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</td>
<td>Hydrocarbons will be used as part of the construction phase of the proposed development. This would involve plant and vehicle fuel and lubricants and will be managed in accordance with best practice.</td>
</tr>
<tr>
<td>Surface water run-off and foul water drainage will be managed on-site during the construction and operational phases. Sustainable Drainage Systems (SuDS) will be incorporated into the drainage design and details will be included within the planning application documents.</td>
<td></td>
</tr>
<tr>
<td>Will there be a risk of accidents during construction or operation of the development which would have effects on people or the environment?</td>
<td>During the construction phase, the contractor(s) would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. All such measures would form part of the CEMP. There are no anticipated significant risks of accidents during operation as the proposed development does not involve users dealing with hazardous substances.</td>
</tr>
<tr>
<td>Will the development involve use, storage, transport, handling or production of substances or materials which could be harmful to people or the environment (flora, fauna, water supplies)?</td>
<td>During the construction phase, certain materials may be present on the site which may be harmful to the environment. However, it is considered that through the implementation of appropriate environmental control measures in line with the relevant legislation there will be no significant environmental effects. The operational development is not expected to involve the use, transport or production of substances or materials which could be harmful to the environment.</td>
</tr>
<tr>
<td>Other characteristics</td>
<td>The principal land use will change from an agricultural site to residential and open space/recreational uses. There would be changes to the site during the construction phase, subject to the requirements of Sport England in respect of pitch provision, but no significant changes to topography.</td>
</tr>
</tbody>
</table>

2. LOCATION OF THE DEVELOPMENT

(a) Existing land use

Are there existing land uses on or around the location which could be affected by the development, e.g. residential, industry, commerce, trade, agriculture, etc.? |

The site is currently in agricultural use. Residential properties surround the site on three sides. These properties have views into the site that would alter...
<table>
<thead>
<tr>
<th>SCREENING CRITERIA</th>
<th>PROPOSED DEVELOPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying?</td>
<td>During construction of the proposed development. Although the existing height on site will increase as a result of the proposed development, its design and height will be informed by visual analysis. A Landscape and Visual Impact Assessment will be submitted in support of the planning application. Construction traffic, noise and dust effects would also be likely in these locations but, through the implementation of mitigation measures through a CEMP, are not expected to be significant.</td>
</tr>
<tr>
<td>Is the development located in a previously undeveloped area where there will be loss of greenfield land?</td>
<td>The site is currently in Grade 2 agricultural use.</td>
</tr>
<tr>
<td>(b) Relative abundance, quality and regenerative capacity of natural resources in the area*</td>
<td>According to Environment Agency flood mapping, the site is located in Flood Zone 1. The watercourse which forms the northern boundary of the site is in Flood Zone 3. This is outside the proposed built footprint area. Therefore, the risk of flooding for the completed proposed development is considered to be low. The site is located within Zone 3 (total catchment) of a groundwater Source Protection Zone (SPZ). A Flood Risk Assessment (FRA) of the site has been undertaken, and will be submitted with the planning application. None of the other features are present in or adjacent to the site.</td>
</tr>
<tr>
<td>(c) Absorption capacity of the natural environment**</td>
<td>There are no statutory designations within or directly adjacent to the site i.e. there are no Scheduled Monuments, Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest (SSSI), National Parks, Special Areas of Conservation (SAC), Special Protection Areas, or Ramsar Sites. In the surrounding area there are sensitive areas that are considered likely to be too distant to be affected. The Broads National Park is located 0.6km to the south of the site, to the south of Brundall village and beyond the railway line. The marsh areas benefit from both international and national nature conservation protection - Broadland SPA, The Broads SAC, and Yare Broads and Marshes SSSI. The Broads Authority would be a consultee in respect of the proposed development, due to its proximity to the site. However, we do not consider that the proposed development would have a significant effect on the Broads National Park area, directly or indirectly.</td>
</tr>
</tbody>
</table>

*Identifies the specific type of natural resources that could be affected by the development.

**Identifies the absorption capacity of the natural environment in terms of how well it can cope with the development.
<table>
<thead>
<tr>
<th>SCREENING CRITERIA</th>
<th>PROPOSED DEVELOPMENT</th>
</tr>
</thead>
</table>
| There are a handful of listed buildings within Brundall (within 1km of the site), as follows:  
- Grade I – Church of St Michael;  
- Grade II* - Church of St Lawrence; and  
- Grade II – four properties on The Street – Manor Farm Garage, Old Beams, The Gables, The Manor House. In addition, the Brundall Signal Box is also Grade II listed.  
There are a further 14 Grade II listed buildings in Blofield, within 1.5-2km of the site, and one Grade I listed building. There is a listed building located just to the south of Bradeston Marsh, about 2km south of the site.  
The closest densely populated area to the site is Norwich, the centre of which is approximately 8km to the west of the village of Brundall.  
We have referred above to the Broads National Park, located to the south of the site, and the nature conservation designations which relate to that area.  
The Applicant is not aware of any other areas around the site which are important or sensitive.  
As above. Ecology assessments have been prepared and will be submitted with the planning application. These assessments considered reptiles, water voles and otters, and great crested newts, and concluded that there was no evidence of any great crested newts or water voles and otters within the site. However, it was recommended that the site should be resurveyed after two years in respect of water voles and otters, on the basis that they are mobile species, if there is no change in the status of the site. Whilst there was some evidence of the presence of grass snakes on the site, the majority of the potential reptile habitat on the site is being retained.  
None of the other features are present in or adjacent to the site. A Flood Risk Assessment has been prepared and will be submitted with the planning application.  
The site is located within a Groundwater SPZ, and overlies Secondary A Aquifer and Principal Aquifer. A Flood Risk Assessment has been prepared and will be submitted with the planning application.  
The Neighbourhood Plan identifies some Key Views within the village, one of which is from the Memorial Hall looking north east towards the village of Blofield. The design and height of the proposed development... |
<table>
<thead>
<tr>
<th>SCREENING CRITERIA</th>
<th>PROPOSED DEVELOPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected?</td>
<td>Any routes used by the public, such as the footpath running along the southern boundary of the site along with the access to the Memorial Hall via Links Avenue, would be temporarily adversely affected during the construction phase.</td>
</tr>
<tr>
<td>Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected?</td>
<td>The construction phase of the proposed development would involve changes to traffic movements (e.g. use of HGVs). In addition, there is likely to be an increased number of vehicles using the local road network once the proposed development is operational. A Transport Assessment will be submitted in support of the planning application.</td>
</tr>
<tr>
<td>Is the development in a location where it is likely to be highly visible to many people?</td>
<td>The potential for local views of the site exists from public routes and residential and community uses in the vicinity of the site. Although the existing height on site will increase as a result of the proposed development, its design and height will be informed by visual analysis, which will include the current use of the site and the existing urban environment. A Landscape and Visual Impact Assessment will be submitted in support of the planning application.</td>
</tr>
<tr>
<td>Are there any areas or features of historic or cultural importance on or around the location which could be affected?</td>
<td>The Applicant is not aware of any features of historic or cultural importance on or around the site which would be directly or indirectly affected.</td>
</tr>
<tr>
<td>Are there any areas on or around the location which are densely populated or built up, which could be affected?</td>
<td>Residential and community uses are situated in the vicinity of the site. Best practice mitigation measures implemented throughout the construction works would minimise any adverse effects during the construction phase.</td>
</tr>
<tr>
<td>Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected?</td>
<td>The Applicant is not aware of any such areas.</td>
</tr>
<tr>
<td>Is the location of the development susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the development to present environmental problems?</td>
<td>According to Environment Agency flood mapping, the majority of the site is located in Flood Zone 1, with the watercourse corridor along the northern boundary being within Flood Zone 3. The development area of the site is in Flood Zone 1, therefore the risk of flooding for the completed proposed development is considered to be low. The site is located within a groundwater SPZ. The site is not considered susceptible to any other hazards.</td>
</tr>
<tr>
<td>SCREENING CRITERIA</td>
<td>PROPOSED DEVELOPMENT</td>
</tr>
<tr>
<td>--------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td><strong>CHARACTERISTICS OF THE POTENTIAL IMPACT</strong></td>
<td></td>
</tr>
<tr>
<td><strong>(a) Extent of the impact</strong></td>
<td></td>
</tr>
<tr>
<td>Will the effect extend over a large area?</td>
<td>No. This is confined to the site (approximately 17.0ha) and the land immediately adjacent.</td>
</tr>
<tr>
<td>Will many people be affected?</td>
<td>No. Occupiers of surrounding properties and buildings have the potential to be affected by the proposed development.</td>
</tr>
<tr>
<td><strong>(b) Transboundary nature of the impact</strong></td>
<td></td>
</tr>
<tr>
<td>Will there be any potential for transboundary impact?</td>
<td>No. (n.b. Development which has a significant effect on the environment in another Member State is likely to be very rare. It is for the Secretary of State to check Environmental Statements to decide whether there is likely to be such an effect in each case).</td>
</tr>
<tr>
<td><strong>(c) Magnitude and complexity of the impact</strong></td>
<td></td>
</tr>
<tr>
<td>Will there be a large change in environmental conditions?</td>
<td>No.</td>
</tr>
<tr>
<td>Will the effect be unusual in the area or particularly complex?</td>
<td>No.</td>
</tr>
<tr>
<td>Will many receptors other than people (fauna and flora, businesses, facilities) be affected?</td>
<td>No.</td>
</tr>
<tr>
<td>Will valuable or scarce features or resources be affected?</td>
<td>This is considered to be unlikely.</td>
</tr>
<tr>
<td>Is there a risk that environmental standards will be breached?</td>
<td>No.</td>
</tr>
<tr>
<td>Is there a risk that protected sites, areas, and features will be affected?</td>
<td>No.</td>
</tr>
<tr>
<td><strong>(d) Probability of the impact</strong></td>
<td></td>
</tr>
<tr>
<td>Is there a high probability of the effect occurring?</td>
<td>The effects of the proposed development can be clearly established and the probability of any effects determined with reasonably confidence.</td>
</tr>
<tr>
<td>Is there a low probability of a potentially highly significant effect?</td>
<td>As above.</td>
</tr>
<tr>
<td><strong>(e) Duration, frequency and reversibility of the impact</strong></td>
<td></td>
</tr>
<tr>
<td>Will the effect continue for a long time?</td>
<td>Construction effects would be short term in duration and the operational effects would be long term.</td>
</tr>
<tr>
<td>Will the effect be permanent rather than temporary?</td>
<td>Construction effects would be temporary and the operational effects would be permanent.</td>
</tr>
<tr>
<td>Will the impact be continuous rather than intermittent?</td>
<td>Construction – intermittent Operation – continuous</td>
</tr>
<tr>
<td>If intermittent, will it be frequent rather than rare?</td>
<td>Frequent.</td>
</tr>
<tr>
<td>Will the impact be irreversible?</td>
<td>Construction – Yes Operation - No</td>
</tr>
<tr>
<td>Will it be difficult to avoid or reduce or repair or compensate for the effect?</td>
<td>No.</td>
</tr>
</tbody>
</table>

**Conclusion**

The proposed development falls within Schedule 2, 10 (b) of the EIA Regulations as an urban development project. Although the proposed development would exceed the site area threshold of
5ha, the proposed development would not have significant urbanising effects on a site surrounded on three sides by residential properties. The proposed development would also comprise uses similar to existing surrounding uses. The proposed development’s potential cumulation with the identified committed developments has been considered in the assessment.

The environmental effects expected to occur as a result of the proposed development relate to construction and operational increases in traffic movements and associated noise and air quality emissions.

Due to the location of the site, within the village of Brundall, the proposal would provide development of a similar type as currently exists in the surrounding area, which would be informed by detailed landscape and visual analysis, and it is not expected that likely significant effects on the environment as defined by the EIA Regulations would be identified. Therefore, an Environmental Statement is not anticipated to be necessary to support a forthcoming planning application.

In accordance with validation requirements, the following documents relevant to this screening assessment will be submitted in support of the planning application include:

- Landscape and Visual Impact Assessment;
- Design and Access Statement;
- Transport Assessment;
- Flood Risk Assessment;
- Ecology Assessments, including:
  - A report summarising the findings of the Phase 1 Habitat Survey and Desk Study and assessing the implications of the scheme on the habitats present within the site and designated sites in the surrounding area;
  - Reptile Survey;
  - Great Crested Newt Survey;
  - Water Vole and Otter Survey; and
- A Utilities Assessment.

**Summary**

To conclude, we request the following from your Authority that you provide us with an Environmental Impact Assessment (EIA) Screening Opinion in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, as amended.

We would be more than happy to meet with you at your Offices in order to discuss the enclosed, if you consider that to be helpful.

We would be grateful for an acknowledgement, or formal receipt, of this submission.

We look forward to receiving your response within the statutory timeframe as set out in the EIA Regulations.

Yours Sincerely

[Signature]

ROBIN MEAKINS

cc. Phil Courtier - Broadland District Council (by email w. encs)
    Alex Adams - Quantum Land (by email w. encs)
Barton Willmore  
FAO: Mr Robin Meakins  
7 Soho Square  
London  
W1D 3QB

**Date Of Decision :** 12 January 2017  
**Development :** Screening Opinion - Up to 170 Dwellings including means of access and formal and informal open space  
**Location :** Land East of Memorial Hall, Brundall  
**Applicant :** Quantum Land  
**Application Type:** EIA Screening Opinion


The proposed development falls within the description at paragraph 10 (b) 'Urban Development Projects' of Schedule 2 of the above Regulations on the basis that the area of development exceeds the thresholds specified in column 2 (as amended); 150 dwellings and 5 hectares.

Having taken into account the criteria set out in Schedule 3 of the Regulations the Local Planning Authority is of the opinion that the development would not be likely to have significant effects on the environment by virtue of factors such as its characteristics, location, size, potential impact or cumulation with other development. Further details of the Screening Opinion are below.

Accordingly, the Local Planning Authority has adopted the opinion that the development referred to above is **not EIA development** as defined in the Regulations.

**Informatives:-**

The proposed development is for up to 170 dwellings and open space (formal and informal), the site area is approximately 17 hectares.

Guidance on identification of Schedule 2 development requiring Environmental Impact Assessment suggests that 'the likelihood of significant effects will generally depend upon the characteristics of the development (e.g. size, use of natural resources, quantities of pollution and waste generated); the environmental sensitivity of the location; and the characteristics of the potential impact (e.g. its magnitude and duration)'. The possible cumulative effects should also be considered.

The Local Planning Authority is of the opinion that it is unlikely the proposed development in isolation or in combination would result in significant effects on the environment. The proposed development is not of more that local importance in terms of its environmental and ecological effects that cannot be assessed and addressed within the normal validation requirements and determination of the planning application.
It is therefore considered unlikely that the development would result in significant environmental effects within the meaning of the EIA Regulations.

Signed

Mr P Courtier
Head of Planning
Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR7 0DU
Date Of Decision: 03 February 2017
Development: Change of Use from Agricultural Land to Land for Recreational Purposes
Location: Land East of Brundall Memorial Hall, Brundall, NR13 5LL
Applicant: Brundall Parish Council
Application Type: Full Planning

Town & Country Planning Act 1990

The Council in pursuance of powers under this Act GRANTS PLANNING PERMISSION for the development referred to above in accordance with the details on the application form and subject to the following conditions:-

1. The development to which this permission relates must be begun not later than THREE years beginning with the date on which this permission is granted.

2. The development hereby permitted shall not be carried out otherwise than in accordance with the plans and documents listed below.

All plans and documents previously approved under application reference number 20050410.

3. Prior to the commencement of the use hereby permitted, full details of access and parking arrangements shall be submitted to and approved by the Local Planning Authority in consultation with the Highway Authority. The details to be submitted shall include laying out; demarcation; levels; surfacing and drainage. The works shall be fully implemented in accordance with the approved details prior to the first bringing into use of the playing field.

4. Prior to the commencement of the use hereby permitted the following details shall be submitted to and approved by the Local Planning Authority:
(a) the laying out of the site and development thereon which shall be based upon an accurate survey of the site and to include levels (existing and proposed), gradients, sections in relation to adjoining sites
(b) a detailed scheme of all external materials to be used in the development
(c) an accurate plan showing the position, height, spread and species of all existing trees and hedges within and on the boundaries of the site including measures for their protection during the course of the development of the site
(d) the landscaping of the site (including any proposed changes to existing ground levels, means of enclosure and boundary treatments, hard surfaced areas and materials, planting plans, specifications and schedules, existing plants to be retained and showing how account has been taken of any over ground or underground services.
(e) the layout of foul sewers and surface water drains
(f) the provision, alignment, height, materials of all walls, fences and other means of enclosure
(g) the provision to be made for the storage and disposal of refuse

The works (a - g above) shall be carried out in accordance with the details as approved.

**The reasons for the conditions are:-**

1
The time limit is imposed in compliance with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2
For the avoidance of doubt and to ensure the satisfactory development of the site in accordance with the specified approved plans and documents.

3
To ensure the satisfactory development of the site in accordance with Policies TS3 and TS4 of the Development Management DPD 2015.

4
To ensure the satisfactory development of the site in accordance with Policy GC1 of the Development Management DPD 2015.

**Plans and Documents:-**

Dwg No BPC001 Location Plan received 09 December 2016

**Informatives:-**

The Local Planning Authority has taken a positive and proactive approach to reach this decision in accordance with the requirements of paragraphs 186-187 of the National Planning Policy Framework.

The permission hereby granted relates to the change of use of the land only and does not permit the construction/erection of any buildings/structures. All such buildings and structures shall be subject to a further planning application to the Local Planning Authority.

Signed

[Signature]

Mr P Courtier
Head of Planning
Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR7 0DU
Information relating to appeals against the decision of the Local Planning Authority.

If you are aggrieved by this decision to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

Any appeal must be made within 6 months of the date of this notice unless the proposed development is for minor commercial development (shop fronts and similar) in which case any appeal must be made within 12 weeks of the date of this notice.

However if an enforcement notice has been served for the same or substantially the same development within the period of two years before this application was made, or subsequently, then the period within which an appeal can be lodged is reduced to 28 days from the date of this decision or 28 days from the serving of the enforcement notice, whichever is the later.

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

Appeals must be made using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN, Tel: 0303 444 00 00 or via the Planning Portal at https://www.gov.uk/appeal-planning-inspectorate

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

Purchase Notices

If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the District Council in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.
A1 - Emergency access via Links Avenue with no sports layout
06 June 2017

Legend:
01 Formal Playing Area
02 Marr Dyke Country Park
03 Sustainable Urban Drainage System
04 Hedgerow and Shrub Planting
05 Trees & Hedgerow Buffer
06 Children’s Play Area
07 Public Footpaths
08 Main Road (Type 2)
09 Emergency Access Route
10 Shared Surface / Mews
11 Pumping Station / Sub Station
12 Development parcels
13 Run Dike
14 Phase 1 Parcel
15 Main Access
16 Informal Open Space
17 Existing Changing Facilities / Parking
18 Pedestrian/Cycle Route

Diagram showing a map with various features and parcel numbers.
A2 - Emergency access via Links Avenue with Quantum Illustrative Layout

06 June 2017

Legend

01 Formal Playing Area
02 Marr Dyke Country Park
03 Sustainable Urban Drainage System
04 Hedgerow and Shrub Planting
05 Trees & Hedgerow Buffer
06 Children’s Play Area
07 Public Footpaths
08 Main Road (Type 2)
09 Emergency Access Route
10 Shared Surface / Mews
11 Pumping Station / Sub Station
12 Development parcels
13 Run Dike
14 Phase 1 Parcel
15 Main Access
16 Informal Open Space
17 Existing Changing Facilities /Parking
18 Pedestrian/Cycle Route
A3 - Emergency access via Links Avenue with Parish Illustrative Layout

06 June 2017
B1 - Emergency access via Meadow View with no sports layout
06 June 2017

Legend
- Formal Playing Area
- Marr Dyke Country Park
- Sustainable Urban Drainage System
- Hedgerow and Shrub Planting
- Trees & Hedgerow Buffer
- Children's Play Area
- Public Footpaths
- Main Road (Type 2)
- Emergency Access Route
- Shared Surface / Mews
- Pumping Station / Sub Station
- Development parcels
- Run Dike
- Phase 1 Parcel
- Main Access
- Informal Open Space
- Existing Changing Facilities /Parking
- Pedestrian/Cycle Route
- Pavilion
- MUGA
- Skate Park
B2 - Emergency access via Meadow View with Quantum Illustrative Layout

06 June 2017

Legend

01 Formal Playing Area
02 Marr Dyke Country Park
03 Sustainable Urban Drainage System
04 Hedgerow and Shrub Planting
05 Trees & Hedgerow Buffer
06 Children’s Play Area
07 Public Footpaths
08 Main Road (Type 2)
09 Emergency Access Route
10 Shared Surface / Mews
11 Pumping Station / Sub Station
12 Development parcels
13 Run Dike
14 Phase 1 Parcel
15 Main Access
16 Informal Open Space
17 Existing Changing Facilities /Parking
18 Pedestrian/Cycle Route
B3 - Emergency access via Meadow View with Parish Illustrative Layout
06 June 2017

Legend
01 Formal Playing Area
02 Marr Dyke Country Park
03 Sustainable Urban Drainage System
04 Hedgerow and Shrub Planting
05 Trees & Hedgerow Buffer
06 Children's Play Area
07 Public Footpaths
08 Main Road (Type 2)
09 Emergency Access Route
10 Shared Surface / Mews
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12 Development parcels
13 Run Dike
14 Phase 1 Parcel
15 Main Access
16 Informal Open Space
17 Existing Changing Facilities /Parking
18 Pedestrian/Cycle Route
19 Pavilion
20 MUGA
21 Skate Park
APPENDIX 9
PHASE 1 BOUNDARY PLAN
APPENDIX 10

LETTER TO BDC REQUESTING A PRE-APPLICATION OPINION
Dear Sir/Madam,

LAND EAST OF THE MEMORIAL HALL, BRUNDAL
REQUEST FOR PRE-APPLICATION ADVICE

Further to our on-going discussions and meetings, we formally write in respect of the above site, the boundaries of which are indicated on the Site Location Plan attached (drawing no. 26007-03 Rev.B), to request your pre-application advice in relation to the proposed development. If your comments are positive then a formal planning application could be made before the end of the year.

The Site

The site is located in the village of Brundall, to the east of the city of Norwich, and to the south of the village of Blofield. The site extends to just over 17ha, and is bounded to the south, east and west by residential properties. The Memorial Hall and children’s play area are also located in the south western corner of the site. To the north the site has a more open aspect, and slopes downhill to the Run Dike, which forms the northern boundary of the site. The site is currently in agricultural use and is bordered by hedgerows and trees.

There is an existing access to the Memorial Hall and changing rooms from Links Avenue, in the south west corner of the site. In addition, there are potential vehicular access points from Highfield Avenue in the south eastern corner, and from the same road in the north eastern corner. A footpath runs along the southern boundary of the site linking Brigham Close and Highfield Avenue.

The Proposals

The development proposals for the site are illustrated on the Framework Plan (drawing no. 26007-02 Rev.D) attached, and are in two parts as follows:
1) **An outline planning application** – for up to 170 dwellings with associated vehicular, cycle and pedestrian access, in other words the application will be for the maximum development quantum proposed, and access. All other matters – layout, scale, appearance and landscaping – will be the subject of future approvals; and

2) **A detailed application for Phase 1** – for 23 units, in the south eastern corner of the site and within the area covered by the outline planning application.

The Framework Plan shows one way in which the development proposals could come forward, and is for illustrative purposes only. With the exception of Phase 1, the precise layout of the dwellings across the site will not be fixed, but will be controlled through the use of a series of Development Parameter Plans. These plans will control the finished ground levels, the maximum heights and the extent of the built footprint, the location of recreation and ecological areas, and the movement corridors. We are aware that your Authority has experience of working with outline planning applications which include Development Parameter Plans, and that you understand their role in controlling future reserved matters applications via planning conditions.

For your information we have attached the following Development Parameter Plans for your review:

i. **Plan 1** – Finished Ground Levels (drawing no. 26007-06 Rev.B);
ii. **Plan 2** – Maximum Building Heights and Built Development Extents (drawing no. 26007-07 Rev.B);
iii. **Plan 3** - Recreation and Ecological Connectivity Zones (drawing no. 26007-08 Rev.A);
iv. **Plan 4** – Recreational Zones (drawing no. 26007-09 Rev.B); and
v. **Plan 5** – Primary Movement Corridor (drawing no. 26007-10 Rev.B).

As referred to above, it is intended to make this application in 'hybrid' form, with the whole site being covered by an outline application and part of the site being submitted in detail. The Framework Plan identifies that detailed area, otherwise known as the 'Phase 1 parcel' (identified by the number 14 on the Framework Plan), and the Phase 1 parcel is shown on the Planning Layout - Phase 1 plan attached (drawing no. 26007-PL01 Rev.C). We also attach the following:

i. package of detailed house types proposed for the Phase 1 parcel (drawing 26007-HT01 Rev.A to HT12.2 Rev.A);
ii. **Street Elevations** (drawing no. 26007-PL02);
iii. **Building Materials** (drawing no. 26007-PL04);
iv. **Ridge and Slab Heights** (drawing no. 26007-PL05); and
v. **Landscape Proposals Plan** (drawing no. 26007-L101).

These plans have all been prepared in support of the detailed Phase 1 parcel and provide all the necessary information to enable the Phase 1 parcel to be approved in full. The headlines in respect of the proposed development are as follows:

- Up to 170 dwellings in total, including later life retirement living and affordable homes;
- Phase 1 parcel including 23 units, of which 7 units will be affordable;
- Main access to be from Brundall Road;
- Emergency access via Links Avenue;
- Access maintained to the Memorial Hall and the existing changing facilities;
- Public footpaths and other pedestrian and cycle routes through the site;
- Provision of formal sports pitches;
- Provision of a children’s play area;
- Provision of over 10ha of country park, along with informal open space, with public access;
- SUDS to help to ensure acceptable run-off into Run Dike; and
- Retention of existing tree and hedgerow buffers.

The vision for the development is to create a visually contained development that benefits the wider community through the provision of formal outdoor play, informal open space and country park. The
proposed development will form a new neighbourhood within Brundall, creating a new community set in a generous Country Park landscape with views over parkland and countryside towards historic Blofield. Residents of Brundall and Blofield will also have access to, and be able to benefit from, the Country Park. The maintenance of existing footpaths, and the creation of new routes through the Country Park will increase accessibility.

The development proposals incorporate the provision of a new Country Park and formal/informal playing fields, which will be gifted to a community interest group, ideally the Parish Council. The Country Park will extend to just over 10 hectares, and will enable the provision of a series of habitats for ecology, informal space, walking and cycling. The Country Park could also include picnic areas, an adventure playground and nature/trim trails. The precise mix of facilities and features within the Country Park would be decided in partnership with the eventual owners, potentially the Parish Council. In addition, the Country Park area will include a new recreation area, to incorporate play equipment and formal sports pitch(es). The Country Park will be focussed along the northern boundary of the site, along the watercourse, with the recreation area to be located closer to the Links Avenue access to the site.

A range of building typologies will enable the development of diverse and attractive character areas which respond to the topography. The Phase 1 parcel, in the north east of the site adjacent to the proposed main access, will deliver a total of 23 units in the following mix:

- Affordable units (7 total):
  - 2 no. 1 bed flats;
  - 3 no. 2 bed houses; and
  - 2 no. 3 bed houses;

- Open market units (16 total):
  - 2 no. 2 bed houses;
  - 8 no. 3 bed houses; and
  - 6 no. 4 bed houses.

The plans enclosed indicate the proposed building materials and landscaping within this Phase 1 parcel.

A Design and Access Statement ('DAS') is being prepared in support of the application. It will explain the design principles and concepts that have been applied in respect of the development, and demonstrate how the proposed developments context has influenced the design. In addition to this we have prepared the following reports:

i. A Transport Assessment, prepared by Rossi Long consulting (October 2016);

ii. Ecological assessments undertaken by Hankinson Duckett Associates (September 2016) comprising:
   a. A report summarising the findings of the Phase 1 Habitat Survey and Desk Study and assessing the implications of the scheme on the habitats present within the site and designated sites in the surrounding area;
   b. Reptile Survey;
   c. Great Crested Newt Survey; and
   d. Water Vole and Otter Survey;

iii. A Flood Risk Assessment, prepared by Rossi Long consulting (October 2016); and


As you are aware, we have been in contact with Lesley Marsden, the Principal Landscape Architect at the County Council, regarding the proposals. We have discussed the scope of the Landscape and Visual Impact Assessment (LVIA) that we will be undertaking with her, and she has advised us on the scope of the LVIA. The baseline work has been undertaken, and we will shortly be starting the assessment work. Once completed, we will be sharing this with Lesley.
Planning Background

As well as planning policy in the form of the NPPF at a national level, there are several relevant planning policy documents locally, as follows:

- Joint Core Strategy, Greater Norwich Development Partnership (including Broadland District Council) – adopted January 2014;
- The Broadland District Council (BDC) Development Management DPD – adopted August 2015;
- The BDC Site Allocations DPD – adopted May 2016; and

Our site sits within the Brundall Neighbourhood Plan (BNP) area. The BNP includes a series of policies, some of which are relevant in respect of the proposed development:

1. Policy 1 – Gateways – three gateways are highlighted as being locations in which the conditions for highway users could be improved, including Brundall Road close to the proposed main access to the site. The introduction of a new access at this point will enable improvements to be made to movement in this location;
2. Policy 2 – Walking and Cycling Routes – seeks to improve the network of footpaths and cycleways in order to improve the experience of pedestrians and cyclists, to increase permeability. The ultimate aim is to reduce the reliance on the car, and to encourage more trips on foot or by bike. The network of footpaths includes those along the southern and western boundaries of our site;
3. Policy 3 – Important Views – three key views are identified within the BNP, including the view from the Memorial Hall to Blofield. The importance of this view is acknowledged, along with the key features which need to be maintained. Both the LVIA and the DAS will focus on the importance of maintaining this view, and will set out how the view has had an impact upon the design of the proposals;
4. Policy 4 – Enhanced Recreation Provision – the BNP supports the type of improvements proposed with the scheme described in this letter, and in the location proposed; and
5. Policy 5 – Enhanced Provision for Older People – the BNP acknowledges the need for the provision of homes for older people within the village, as there is limited stock available at present for those who are not able to live entirely independently, but do not require an intensive level of support. The proposed development is in accordance with this policy.

At a District level, the site has previously been considered for development and was included in the ‘Shortlisted Sites’ consultation in late 2011 (ref. BDC0033 and S13-02). The site was discounted at that stage because there was uncertainty regarding the availability of the land, part of it was allocated for recreation, and at that stage there was uncertainty as to the potential impact on the landscape. However, the site scored well on the sustainability matrix. It was described as intrinsically ‘sustainable’, and to this end accords with one of the fundamental aims of the NPPF.

The western portion of the proposed development site is allocated within the BDC Site Allocations DPD (under policy BRU3) for recreational open space, and the policy includes a list of development guidelines for the site. The proposed development generally complies with the provisions of this policy. Brundall itself is identified as a Key Service Centre within the Joint Core Strategy (JCS), which means that it has been identified as being capable of an allocation of land for approximately 50 dwellings. However, the policy also states that the Key Service Centres may have capacity for additional new dwellings, and we will go on to briefly discuss the BDC housing land supply position below.

Policy 4 of the JCS makes clear that, in accordance with the NPPF, proposals for housing will be required to contribute to the mix required to create balanced communities, and to meet the needs of that area. The proposed development is broadly in accordance with the requirements of policy GC4 of the BDC Development Management DPD.
Housing Land Supply

Paragraph 47 of the NPPF requires an LPA to meet the full, objectively assessed needs for market and affordable housing in their areas, and LPA’s are required to identify and update annually their supply of deliverable sites sufficient to provide 5 years’ worth of housing, with an additional buffer of 5%.

The Housing Land Supply Assessment (2015) for the Greater Norwich area states that within the Norwich Policy Area (NPA), within which this site is located, there are 4.39 years of housing land supply. Broadland has the lowest housing land supply figure, at 3.11 years. This is significantly lower than the surrounding areas, which are responsible for bringing the overall NPA supply up to 4.39 years. The Broadland Housing Strategy (2012) identified that the District has difficulty in delivering affordable housing and that there is a lack of suitable or available sites for housing development in rural areas.

There is therefore a significant risk that BDC will not be able to secure or maintain a 5-year housing land supply, which provides an opportunity for new and deliverable sites like that the subject of this letter, to come forward for consideration within the Local Plan period. In circumstances where an LPA cannot demonstrate a 5-year housing land supply, the provisions of paragraph 14 of the NPPF become a relevant consideration. In the absence of a 5-year housing land supply, any policies which previously restricted or constrained the delivery of housing can no longer be applied to a site such as this. Instead the provisions of paragraph 14, which indicate a presumption in favour of sustainable development and the granting of planning permission unless any adverse impact of doing so would significantly and demonstrably outweigh the benefit when assessed against the policies of the NPPF as a whole, should be the test.

The site is considered to be sustainable. It is not considered that there are adverse impacts that would significantly and demonstrably outweigh the granting of planning permission, particularly given the amount of open space being created for the local community and the commitment to deliver policy compliant affordable housing provision. It considered the need to deliver housing more quickly within the District (for the reasons set out above), is important and therefore it is proposed to progress a ‘hybrid’ planning application in order to be able to deliver the Phase 1 parcel almost immediately, thereby assisting BDC in their 5-year supply. At the same time this will allow time to ensure that the remaining dwellings are the optimum mix to meet local need, and that they are well designed and in accordance with the Development Parameters and the principles set out in the DAS.

Community Engagement

Engaging with the local community regarding the future development of the site has already occurred. In June this year, Quantum Group held a community engagement event at the Memorial Hall in Brundall over two days in order to share their proposals for the site. They held one-to-one meetings with stakeholder groups, as well as holding a wider exhibition. This covered the basic development principles for the site, including the views, the allocation of part of the land for recreation, the recreation benefits, SUDS, footpath linkages etc. The exercise was also an opportunity to discuss some of the potential effects of the proposed development, and to invite comment from the community regarding the development proposals, as well as the potential future uses within the proposed recreation area. Discussions have also taken place with Blofield and Brundall Parish Councils, and the statutory consultees.

Summary

In light of the above and that a planning application submission could be made shortly, we respectfully request that you consider the information contained within this letter and advise us on your views as to the acceptability of the site for the development proposed. In addition to the above, we would be grateful if you could also advise us of the following:
what supporting information you will require in respect of the proposed development, and form of application as described above;
the planning application fee that would be payable for the proposed development, in the form of application described (hybrid); and
what the likely CIL and S106 liability would be in respect of the proposals.

We would be more than happy to meet with you at your Offices in order to discuss the enclosed, if you consider that to be helpful.

We would be grateful for an acknowledgement, or formal receipt, of this submission.

Yours Sincerely

ROBIN MEAKINS

cc. Phil Courtier - Broadland District Council (by email w. encs)
    Alex Adams - Quantum Land (by email w. encs)