Good Morning.

Thank you for giving me the opportunity to speak today. And speak to support Broadland District Council’s refusal of this application.

My name is Cllr Andrew Proctor. I am the Leader of Norfolk County Council. I represent the Blofield & Brundall division on the County Council. Until 2019 I was one of the members of Broadland District Council representing the Brundall ward. I have lived in Brundall for 32 years.

In planning terms the first consideration the planning authority must give in determining an application, particularly one of this nature and substance, is to the policy framework.

That is also true for the Planning Inspectorate in its consideration of appeals where there has been an attempt to clearly breach planning policy.

Robust, sustainable planning policies are the ways through which local authorities can properly manage development in their area. Not control as that belongs to a bygone era in planning. Those policies are worked up in consultation with communities and many others. They also include the duty to co-operate taking account of, in this case, the established hierarchy of development in Greater Norwich.
Proposed development should therefore be in accordance with the local plan and its policies. There is no point having a plan if anyone can come along, just as here, and say this is where we want to build so never mind your plan.

For key service centres such as Brundall and Blofield the plan target was about 100 new houses each.

**That number has already been well exceeded.**

Broadland District Council has those policies in place created in the above way and that should be the starting point in how this appeal is considered. **It was the primary reason the application was refused in July 2019.**

In addition, Broadland’s policies are supplemented by the adopted Brundall Neighbourhood Plan which has considerable weight in the overall policy framework. **In that respect too this proposal is contrary to its provisions.**

With regard to this appeal the opening question must be – is this application contrary to local plan policy? **Yes it is, and therefore substantial credit should go to Broadland District Council and substantial debit to Quantum.**

For that reason it is a reasonable argument to say that because of this answer the appeal cannot and should not progress and should therefore be dismissed.
But Quantum have argued there are material considerations to the policy being set aside and allowing the development to proceed. I will comment on those later but I would, however, strongly contend that the “offers” in the package from Quantum are far from sufficient to see them trump the policy situation.

Of additional particular and relevant importance is the 5 year land supply. This is what predatory developers rely on councils not having when they submit speculative applications contrary to the local development plan.

Brundall and Blofield have been hammered with planning applications coming forward contrary to the local development plan and policy. But having to approve them in the past was because Greater Norwich did not have a 5 year land supply at that time.

In July 2019 at the determination point by Broadland’s Planning Committee Greater Norwich had in excess of a 5 year land supply (6.83 years as referred to in the officer report).

That external pressure did not exist then so this application should never have been entertained for approval. For Quantum to say at that time that the 170 houses were needed for the 5 year land supply was a totally incorrect assertion on their part.
Regrettably it seems that Quantum are still trying to advance the argument that there is a deficit in the 5 year land supply for Greater Norwich now. They were wrong before and they are wrong again.

Once these key principles have been established, and they clearly weigh very much in favour of Broadland’s decision, para 5.112 of the original officer report needs to be considered.

**It clearly says that the proposal does not accord with the development plan and para 11 of the NPPF (the “tilted balance”) is not engaged.**

When any development proposal is “finely balanced” it should be a very strong view that the policy position is the key determinant. Material considerations can outweigh policy but they have to be substantial. Those cited in this case are not in that league.

In this context I ask the Inspector to refer to the comments in 5.23 and 5.24 of the original officer report. Whilst they could be considered to be beneficial material considerations they pale into insignificance against the policy objection. For Quantum to try to use them as something that could be seen as in favour of the development can only be regarded as a weak struggle to justify the unjustifiable.
The significant credit to Broadland and significant debit to Quantum on the policy position cannot be regarded as anything other than a very small progression for Quantum. But it certainly goes nowhere near making up the differential.

I know the proposed recreational facilities are needed in Brundall. But should they be such a strong material consideration in favour of this application that, I say again, is so completely against policy? Definitely not. That provision can be delivered locally by Brundall Parish Council. They have the funding and scheme to do so and certainly without an extra 170 houses.

And Quantum’s over provision of affordable housing. Another easy thing to say at outline stage. Unfortunately that has been said many times before and once the outline application gets its ticket back comes the developer and says – we can’t do that anymore it’s not viable. Whatever Quantum are saying it will be no different for this one. Whatever conditions are imposed it won’t change a thing for the future.

It is right to say that local services would be adversely affected by this proposal. It is right to say that there isn’t the social infrastructure to support this proposed development – schools, doctors and dentists for example. It is right to say that the road infrastructure would be badly affected.
There would be significantly more pressures on the Cucumber Lane roundabout so just doing a little tinkering at the margins will not work. The cumulative adverse impact of unplanned proposals must be considered. They are not in this case compared to situations where single dwellings in the countryside are soon pounced on for refusal as they would allegedly clog up the network.

The amount of traffic this and other approved schemes will generate will clog up the local road network here and make the Cucumber Lane roundabout on to the A47 trunk road even more congested.

Given that communities have had a hand in shaping planning policy and how those policies have been set aside when the 5 year land supply was not being achieved, Brundall’s community is fed up to the back teeth with inappropriate and predatory applications, contrary to policy. Ones that have come through in outline despite developers saying they are for much needed housing in the area. Then why have they sat there for ages before anything started to get built? And, apart from one site, the rest have delivered nothing of substance to the local community in Brundall.
There have been many representations made from the community to substantiate the various adverse impacts. This is especially so from Brundall School and what is said in paragraph 5.42 of the original officer report. On a constrained site no amount of CIL, even if it was to be directed to Brundall, would solve that conundrum. In any event CIL is shared by the Greater Norwich planning authorities and the current allocation to schools, given the shared fund’s established priorities, would not be allocated in this way.

Those representations emphasise the way the community feels about this – very concerned to say the least. They are not nimby views but proper and valid planning and impact issues. Brundall Parish Council has not been swayed by the material considerations offer – they are putting the community first in their views.

**In summary I ask the Inspector to look at section 5 of the original officer report and see how many times policy is mentioned. This application is mostly in outline of course with the soft and easy promises that get made at the outline stage to deliver this and deliver that. There is nothing that says those somewhat tenuous material considerations override policy because they don’t.**

**In every sense this is a speculative and predatory application totally contrary to local plan and**
neighbourhood plan policy. It has very little to say it’s good for Brundall. And it is not good for Brundall.

I would therefore request that the Inspector refuses the appeal.