1. I am Chairman of Brundall Parish Council ("BPC"), a position I have held since May 2018 and I have been a member of the Parish Council since I was elected in 2012.

2. BPC’s reasons for opposing the development are as set out in our Representation dated 17 February 2020. BPC supports the decision of the members of local planning authority (LPA) Broadland District Council Planning Committee to refuse to grant planning permission for the development.

3. General objections to the development are:
   - it will obstruct views across open landscape against BrNPlan policy 3
   - It will impact on views to Blofield church
   - it conflicts with the policy allocation for open space for the village (BRU3)
   - The development is outside the defined settlement limit.
   - it is widely opposed within the village;
   - there are remaining highway network concerns.

4. The general objections will be addressed in detail in this Inquiry, as will the issue of whether the District Council can demonstrate a 5-year supply for housing. To avoid wasting Inquiry time, this statement focuses on the issue of the provision of Public Open Space (POS).

5. The population for the village as at the 2011 census was 4,019 and is now reasonably estimated at 4500. Already consented development will add in the region of 155 houses in Brundall. For historic reasons, Brundall's public open space is significantly below requirements expected for a village of this size. The post WW2 gift of land for the Memorial Hall site has produced a well-used and important social hub for the village.

6. The LPA has identified for this appeal a shortfall for formal POS of the need for 9.09 ha as against existing of 1.48 ha but in calculating this it is assumed that the “spare cemetery field” can be counted as POS. It only has two goalposts on it and will be required in due course for expansion of the cemetery so is not actually permanent open space. That 1.48 ha also excludes the 1.12 ha 3G football facility which is coming through development at Berryfields (see later). Over the years small play areas have been delivered through development but located within the development sites themselves, so not truly used by all within the village.

7. The LPA has identified for this appeal for informal POS needs 18 ha, as against existing of 7.67 ha but latter figure includes Cremer’s Meadow (1.61 ha and county wildlife site) and Church Fen (1.21 ha and local nature reserve) (see later also); these are of their very nature not fully available for use as POS and provide only limited walking facilities. However one calculates the figures, there remains a substantial shortfall, especially for formal POS providing a range of sporting and recreational activities. The full 4.9 ha BRU3 allocation is required and, being located east of the Memorial Hall, is ideally placed to operate alongside the Memorial Hall hub in support of BrNP Policy 4.

8. Within the last 6 years, BPC has created a Countryside Park with woodland and a parkrun and has delivered a much needed 64 plot allotments site along with purchasing Cremer’s Meadow (to the east of the development site).

9. BPC also owns Church Fen located off Church Lane. Rather like the implied “country park” offered by the appellant, Cremer’s Meadow and Church Fen afford limited walking facilities and do not perform the same function as intended for the 4.9 ha allocated site.

10. The allocated site BRU2 at Berryfields is being delivered through development and is providing the village with high quality 3G football and sporting facilities. Quality provision is exceedingly important to the village.
so that the right type of POS is provided to meet identified needs. The Parish Council knows what our community wants to see brought forward, and, most importantly, we know what facilities will get used.

11. The allocated site BRU3 east of the Memorial Hall is for the provision of 4.9 ha of POS. This policy allocation is adopted within the 2016 Sites Allocation and is carried forward in the Greater Norwich Local Plan consultation. Brundall has been noted as most deficient in POS provision for villages in the Norwich area. BRU3 policy states: “The open space will be for formal recreational uses, such as playing pitches, together with more informal recreation such as walks, jogging track etc”.

12. It is most disappointing that the developer here is seeking to use the allocation for the village as a way to facilitate its own development needs. For its development alone (leaving aside the allocated 4.9 ha for the village) the developer should be providing 2.54ha for children’s play space, recreational open space, allotment space and Green Infrastructure. It has ignored the need for the whole 4.9 ha allocation to be protected. There is a justified need for the full 4.9 ha, to deliver a full-size cricket pitch (not a junior pitch), multi-games use area, skate park, pavilion, parkrun track, events/games area, outdoor gym and play equipment and informal open space. BPC has had a detailed design drawn up and supplied that to the District Council. Costings have been obtained and a financial plan established with precept budgeting for a loan from the Public Works Loan Board (following advice from the Ministry of Housing, Communities and Local Government).

13. BPC has been unable to secure any meaningful discussion with the developer. Instead, the developer is offering less than the allocation of 4.9 ha. The offer of the 7 ha entitled country park does not make up for the shortfall on the policy allocation area and is unallocated. The site is not featured in any Local Plan. The Run Dike area adjoins the watercourse and is marshy in part. The planning conditions require further investigation so the suggested design can only be taken as indicative. The developer has its own water attenuation needs; the cost of that should not be regarded as POS provision. In effect, the developer is not offering anything more significant than a footpath. To justify the proposed £256,172 expenditure to develop and prepare that footpath is excessive expenditure, given the more acute needs of the parish for formal POS. We acknowledge that it would provide linear connectivity to Cremer’s Meadow but, since that is really all the developer’s offer entails, the description as “country park” is a misnomer. This area is best kept and enhanced, as an ecological corridor. It cannot be regarded as providing anything like the quality requirement for formal and informal sports and recreational provision that the village needs and that we intend to provide on the 4.9 ha allocated site.

14. The developer has offered conflicting options over the years for formal open space next to the Memorial Hall. The draft S106 provision does not identify sufficiently well what can be accommodated on 3 ha but that reduced size will preclude the quality provision for formal sports facilities that the village needs, as well as some opportunities for informal space in the overall area. Our proposals are policy compliant – (BRU3/RL1/Br Nplan policy 4); those from the developer are not and significantly sub-standard, as comparison of our worked-up design and the developer’s indicative design will show. The supposed “country park” simply does not compensate for the loss of 1.9 ha on the allocated site of 4.9 ha.

15. If this appeal is dismissed, as we say it should be, further discussions can be held with the owners and the developer but, if necessary, BPC will ask Broadland District Council to exercise compulsory purchase powers to bring forward BRU 3 and we have retained specialist legal advice for the purpose.

16. Professional costings for our proposals identify base costs of approx. £170,000 for a pavilion, £600,000 for associated works, £61,000 for re-routing utilities, £300,000 for a MUGA, £205,000 for an adult cricket pitch, plus contractor preliminaries, risks and tender inflation. This does not cover all that we propose, in the longer term. If this developer is intending to try to satisfy requirements for its development by offering only 3 ha POS and a capital sum of £425,000, this still leaves the public sector a substantial cost to deliver what is needed. A development of this nature should be delivering a capital contribution of £1.235 million for formal recreation and £1.84 million for green infrastructure. (BDC Planning Committee Report 10-7-2019 para 4.28**) The developer’s offer is woefully short on what LPA policy requires. We are surprised that the cost of works for the creation of a footpath on the Country Park and landscaping is as high as £250,000 when compared with what QL are suggesting for works on the land east of the Memorial Hall. We have reservations about the viability of a Management Company arrangement in the long term.

17. The Parish Council submits that the key questions are:

- Why should the people of Brundall be deprived of the full allocation of 4.9 ha POS?
- What can a 3 ha site actually deliver?
- Which of the needs identified by BPC for the 4.9 ha site should the people of Brundall be expected to do without, in favour of fitting in more housing on the 1.9 ha the developer wants to remove from the allocated 4.9 ha?

**BDC Planning Committee Report 10-7-2019 para 4.28**

It is noted that the developer is proposing to give 7 ha for Green Infrastructure and 3 ha for formal recreation, all on-site. To provide these equivalent size areas off-site in terms of land, equipping, maintenance etc. would require contributions of £1,235,000 approx. for formal recreation and £1,840,000 approx. for GI. Applicant is proposing an on-site transfer of land [not set up] equating to an over provision in area of both recreational open space and GI; and commuted payments totalling £850,000