Dear Mr Harriss

Infrastructure Requirements: Proposed Residential Development
Land East of Memorial Hall, Brundall
Application No. 20171386

Thank you for consulting the County Council on the potential infrastructure, service and amenity requirements arising from the above proposal as they relate to matters covered in the County Council’s education, library, fire and green infrastructure projects. It is assumed that you have consulted the County Council separately as Highway Authority and as Lead Local Flood Authority.

The comments attached are made “without prejudice” and are an officer-level response to your consultation. The requirements are based on 170 dwellings.

It should be noted that the attached comments are only valid for six months from the above letter date and therefore the County Council would expect to be re-consulted if the proposal is not determined in this period.

While the County Council acknowledges that most infrastructure requirements would need to be funded through the Community Infrastructure Levy (CIL), some might still need to be funded either through a separate legal agreement (e.g. S106 agreement) and/or planning condition.

The County Council would have serious concerns if funding for the attached list of infrastructure requirements mitigating the impact of this development, could not adequately be addressed/delivered through CIL; S106 and/or condition.
Please could you inform the planning obligations team when the application has a resolution to approve, either by committee or through delegated officer powers, so we can then instruct our solicitors as soon as possible in order to avoid any delay in the S106 process.

Please could you keep me informed of any obligations and/or conditions sought from the applicant; and forward the infrastructure requirements to your CIL distribution team.

Should you have any queries with the above comments please call me on (01603) 638038 or Stephen Faulkner (Principal Planner) on (01603) 222752.

Yours sincerely

Laura Waters
Senior Planner

Encl
The following infrastructure will need to be funded through CIL

Education: Mitigation required at Early Education settings for 16 places, Blofield Primary and Brundall School for 47 places and at Thorpe St. Andrew School and Sixth Form for 27 places.

Library: New development will have an impact on the library service and mitigation will be required to develop the service.

Education:

Children generated from this development:

<table>
<thead>
<tr>
<th>Nursery school age: 16</th>
<th>High School age: 24</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary school age: 47</td>
<td>Sixth form age: 3</td>
</tr>
</tbody>
</table>

Current situation at the local schools:

<table>
<thead>
<tr>
<th>School</th>
<th>Capacity</th>
<th>Numbers on Roll (Sept 2018)</th>
<th>Spare capacity No. of places</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Education sector (2-4)</td>
<td>222</td>
<td>182</td>
<td>+40</td>
</tr>
<tr>
<td>Blofield Primary (4-11)</td>
<td>202</td>
<td>219</td>
<td>-17</td>
</tr>
<tr>
<td>Brundall School (4-11)</td>
<td>293</td>
<td>277</td>
<td>+16</td>
</tr>
<tr>
<td>Thorpe St. Andrew School and Sixth Form (11-18)</td>
<td>1726 (excluding mobiles)</td>
<td>1825</td>
<td>-99</td>
</tr>
</tbody>
</table>

Although there is currently spare capacity at Brundall School and at Early Education level, Blofield Primary School is already full and taking into account the permitted planning applications in the area (2014/1710, 2012/1587, 2016/0488, 2013/0296 and 2016/1483) both Blofield and Brundall primary schools will be full, as well as the Early Education sector.
Housing growth in the whole area and pupil number forecasts indicate that the Blofield and Brundall primary schools and the Early Education sector are likely to exceed their capacity. Brundall School is on a restricted site and it is unlikely that much expansion could happen there. With the prospective housing in the area we would need a further 100+ primary places which would put both Blofield and Brundall schools under pressure. And Thorpe St. Andrew School and Sixth Form is unable to accommodate the children generated from this proposed development should it be approved.

It is therefore expected that the funding for the additional school places required at Early Education, Primary and High School levels would be through CIL as this is covered on the District Council’s Regulation 123 list.

**Fire:**

**170 Dwellings**
With reference to the above proposed housing development, taking into account the location and infrastructure already in place our minimum requirement based on 170 dwellings would be 1 fire hydrant per 50 dwellings (rounding up to the nearest 50), on a minimum 90mm main, at a cost of £818.50 each.

**Community/Sports Pavilion**
This should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

**Library:** A development of 170 dwellings would place increased pressure on the library and mitigation is required to increase the capacity of the library.

**Green Infrastructure:**
Connections into the local Green Infrastructure (GI) network, including Public Rights of Way and ecological features, should be considered alongside the potential impacts of development. Direct mitigation and GI provision should therefore be included within the site proposal. Mitigation for new and existing GI features identified as strategic shall be funded by the Community Infrastructure Levy (CIL) through the Greater Norwich Investment Programme. These requirements for consideration and implementation, for both on and off-site GI provision, will help the local GI network to facilitate the development without receiving negative impact and equally, allow the development to integrate and enhance the existing network. Green Infrastructure within this proposal should respond to the Greater Norwich Green Infrastructure Strategy (2007) which informs the Joint Core Strategy, adopted January 2014. Development proposals are expected to fit with strategic visions for the area and respond to corridors as outlined in the Joint Core Strategy. Should this development intend to be the first phase of a larger development or vision, consideration will need to be given to how the local GI network will be impacted, adapted and enhanced in the future.

We support the proposals to incorporate Brundall FP1 into the scheme, the relevant processes would be required for the realignment of FP1, but we feel that the
landscaped green corridor will be an inviting place. The surface and width should be agreed in conjunction with Norfolk County Council to ensure this would be a suitable and safe path for year round usage. The same would apply for Brundall FP2 where it is within the site. Other recreational routes proposed within the site may also require further discussion with Norfolk County Council if they are to be proposed as Public Rights of Way. Brundall BR4 and Brundall FP2 offer connections from the site to the wider network and countryside and will therefore have an increase in footfall from this development, we would be looking for improvements to the surfacing and infrastructure and signage on the local network including routes to the train station. In addition, there is an existing CIL funded project at the closed Landfill site in Strumpshaw, we would be looking to strengthen improvement to this site as a wider recreational offering. From an ecological point of view a management plan for the proposed county park and ecology zones will be required.
Mr Nigel Harriss  
Broadland District Council  
Thorpe Lodge  
1 Yarmouth Road  
Norwich  
Norfolk  
NR7 0DU  

Direct Dial: 01223 582740  
Our ref: W: P01051300  
25 March 2019

Dear Mr Harriss

& Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND EAST OF MEMORIAL HALL, BRUNDALL, NORFOLK  
Application No. 20171386

Thank you for your letter of 15 March 2019 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

Sophie Cattler  
Assistant Inspector of Historic Buildings and Areas  
E-mail: sophie.cattler@HistoricEngland.org.uk
Dear Sir/Madam,

Thank you for consulting me on the above planning application.

In the design and access statement there is reference to Brundall Public Footpath No.1 being diverted but no explanation to how this is being done, for instance under TCPA or Highways Act 1980 legislation? This is an important consideration, no development can take place until an order has been made, confirmed and certified. In order to ensure no obstruction of the highway takes place there needs to be a planning condition reflecting this.

There is very little information regarding surfacing and widths of the two affected PROW, which are Brundall FP 1 and FP2. Where there are proposals for shared use the width of the path needs to be 3 metres wide, although surfacing of the path may be narrower if necessary.

The developer will need to apply to NCC to have the paths temporarily closed to allow for the works to take place, we need at least 6 weeks’ notice in order to advertise the closures and thought should be given about a possible alternative route during the closure period.

The proposed country park/linear green space is welcomed.

As it stands I am unable to support the proposal, without a little more thought being given to the PROW, the proposed diversions and details relating to widths and surfacing of the existing PROW routes.

I am happy for the developer to contact me to discuss the proposal further and hopefully we can work together to resolve these issues.

Kind Regards,

Gemma Harrison, Green Infrastructure Officer (Access)
Environment
Tel: (01603) 223621

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TRA1 – traffic assessment - The transport assessment makes no mention of the impact this development would have on the accumulated traffic flows detailed for access to the A47 at 4 Yarmouth Road / Cucumber Lane. As the main access is out onto Brundall Road, the desire line of traffic will be to enter Blofield via the narrow Brundall Road over Bay Bridge for onward journey to Norwich or Yarmouth – adding more pressure to the congestion woes we already experience in Blofield.

Increased traffic flows over Bay Bridge, which is a narrow single lane, will increase congestion and waiting traffic in that area of Blofield / Brundall and what measures may be put in place to mitigate these concerns.

The traffic assessment statistics provided imply car queues on Yarmouth Road at peak time is 6 cars, of which local knowledge would dispute this statistic particularly as parents leaving after school drop-off around 9am.

There are concerns with regard to the ditch on the Petrol Filling Station side of Yarmouth Road. It is understood that this will be filled in but there are concerns regarding surface water drainage. Where will this ditch be repositioned, or a new culvert positioned?

There are concerns regarding the trees on the Petrol Filling Station side of the road and when the road is widened the Council must look to protecting the existing mature trees if possible.

The Parish Council shares the concerns that NCC Highways have about the reduction of exit width from Cucumber Lane onto the roundabout. It is agreed that better lane markings on the roundabout would be a good thing; but the developer needs to ensure that there is accompanying signage on the approaches to the roundabout, perhaps on the lanes particularly on the A47 east and west.

Signage as you move off the roundabout onto Yarmouth Road for entrances to the Petrol Filling Station and McDonald’s is also welcomed. There is a need to deter HGV/refuse collection lorries/all vehicles for parking on Yarmouth Road after leaving the A47 for food with no parking signs or double yellow lines.

An argument on the statistics appears to be if nothing is done, it will be a worse scenario in the future than allowing the development and changing the lane markings on the roundabout.

There is a problem with traffic statistics provided—there seems to be a use of different measurements from queue wait times in seconds/metres of queue/number of cars.

By 2022 Yarmouth Road will be overcapacity for cars onto the roundabout with the committed development but it is not clear whether this is before or after the amendments to the junction have been made. This was stated in a document dated 9 November.

Application: 20181841

Location: Sunny Acres, Yarmouth Road, Blofield, NR13 4LH

The council had no comments on this application, however if there are any material changes to the application the council would like to be re-consulted.
Good Morning,

Please see the attached letter regarding planning application 20171386, apologies for the delay in responding, however I note the application is yet to be determined.

Kind Regards,

Jess

Jessica Nobbs
Flood and Water Officer (Planning/Enforcement)

Water Management Alliance
Kettlewell House, Austin Fields Industrial Estate, King’s Lynn, Norfolk, PE30 1PH, UK

Consisting of:
Broads Drainage Board, East Suffolk Drainage Board, King’s Lynn Drainage Board
Norfolk Rivers Drainage Board and South Holland Drainage Board in association with Pevensy and Cuckmere Water Level Management Board

Defenders of the Lowland Environment

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Planning Administration
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich
NR7 0DU

Our Ref: 18_00598_P
Your Ref: 20171386

9 August 2018

Dear Sir/Madam,

RE: Development to comprise; up to 170 dwellings (Use Class C2 and C3), and a community/sports pavilion at Land East of Memorial Hall, Brundall.

The site is partially within the Broads (2006) IDB Internal Drainage District (IDD) and therefore the Board’s byelaws apply. The Byelaws for the Board (see link [https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf](https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf)) and detailed maps of the district (see link [https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf](https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf)) including which watercourses are adopted by the Board are available on our website.

We note that the applicant intends to dispose of surface water via infiltration. The proposed strategy should be supported by infiltration testing in line with BRE 365, and should provide evidence of a 1.2m ‘dry zone’ beneath any infiltration structure as per the Lead Local Flood Authority’s letter dated 20/06/2018. If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse, then the proposed development will require land drainage consent in line with the Board’s byelaws (specifically bylaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board’s charging policy. This policy is available using the following link [https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf](https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

We note the presence of a riparian owned/maintained watercourse within the site boundary. If (at the detailed design stage) the applicant’s proposals include works to alter this watercourse, consent will be required under the Land Drainage Act 1991 (and bylaw 4). In addition there is a main river adjacent to the site boundary. If the applicant’s proposals include works to alter this watercourse consent may be required from the Environment Agency.
Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that any required consents are sought prior to determination of the planning application.

Yours sincerely,

Jess

Jessica Nobbs
Flood and Water Officer
Water Management Alliance
Dear Nigel,

Brundall: Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans. Land East of Memorial Hall.

Thank you for the re-consultation dated 19 June 2018. The applicant has submitted a scheme for the A47(T)/Cucumber Lane roundabout which demonstrates that the development can mitigate its impact at this junction. The scheme has been subject to a Safety Audit and will be subject to detailed design and further audits as the scheme progresses. The scheme for the roundabout will be completed prior to first occupation and this is conditioned below.

Turning to other issues, the proposed junction shown on drawing 161068-SK-100 rev P1 provides visibility splays measuring 2.4 x 43m in both directions and forward visibility in excess of this, despite the bend. The transport assessment is supported by a speed survey showing 85%ile speeds of 30mph and 31mph. Provision of 43m visibility is consistent with what would be required by Manual for Streets for the measured speed.

There is good visibility between the proposed junction and Highfield Road and a junction spacing of 50m would not be considered unacceptable in a residential area, on a road subject to a 30mph speed limit. There is also good forward visibility through the short pinch point at the bridge, which therefore would also not be considered a hazardous feature in this environment.
As a consequence, the County Council would not be able to justify a highway objection to the proposed means of access due to either of these two factors.

With regards the options of the two locations for an emergency access. The highway authority has no objection to either or both. They would be adopted as a shared use footway/cycleway, so both options have their merits. They would only be used by emergency vehicles if the main access road into the development was blocked.

In terms of the detailed design, most of our original comments have been accommodated as detailed on Drawing 26007-PL01 Rev F. However the following three issues are yet to be accommodated.

1. We previously requested a shared use footway/cycleway along the length of the main spine road. This should be provided.
2. The bend adjacent to plot 13 is too tight.
3. The parking spaces serving plot 14 should be 3.0m wide.

Provided the three points above are resolved, then the Highway Authority recommends no objection subject to the following conditions:

**SHC00:** No development shall commence until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the Local Planning Authority. (The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established).

Reason: To ensure satisfactory development of the site and to ensure estate roads are managed and maintained thereafter to a suitable and safe standard.

**SHC 01:** No works shall commence on the site until such time as detailed plans of the roads, footways, cycleways, emergency access points, foul and surface water drainage have been submitted to and approved in writing by the Local Planning Authority. All construction works shall be carried out in accordance with the approved plans.

Reason: To ensure satisfactory development of the site and a satisfactory standard of highway design and construction.

**SHC 02:** No works shall be carried out on roads, footways, cycleways, foul and surface water sewers otherwise than in accordance with the specifications of the Local Planning Authority.

Reason: To ensure satisfactory development of the site and to ensure estate roads are constructed to a standard suitable for adoption as public highway.

**SHC 03A:** Before any dwelling is first occupied the road(s), footway(s) and cycleway(s) shall be constructed to binder course surfacing level from the dwelling to the adjoining County road in accordance with the details to be approved in writing by the Local Planning Authority.
Reason: To ensure satisfactory development of the site.

SHC 03B: Prior to the occupation of the 100th dwelling, one of the emergency access points as illustrated on Drawing No 26007 10 Rev D shall be provided in accordance with details to be first submitted to and approved in writing by the Local Planning Authority and shall be retained thereafter in its approved form.

Reason: To ensure satisfactory development of the site.

SHC 19: Prior to the first occupation of the development hereby permitted a visibility splay shall be provided in full accordance with the details indicated on the approved plan. The splay shall thereafter be maintained at all times free from any obstruction exceeding 0.225 metres above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety.

SHC 22: The driveway length in front of the garage(s) shall be at least 6 metres as measured from the garage doors to the highway boundary.

Reason: To ensure parked vehicles do not overhang the adjoining public highway, thereby adversely affecting highway users.

SHC 23: Notwithstanding the provisions of the Town and Country Planning General Permitted Development Order 1995, or any amendments thereto, garage accommodation on the site shall be provided with minimum internal dimensions measuring 3 metres x 7 metres.

Reason: To minimise the potential for on-street parking and thereby safeguard the interest of safety and convenience of road users.

SHC 28: Development shall not commence until a scheme detailing provision for on site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason: To ensure adequate off-street parking during construction in the interests of highway safety.

SHC 29A: Prior to the commencement of any works a Construction Traffic Management Plan and Access Route which shall incorporate adequate provision for addressing any abnormal wear and tear to the highway shall be submitted to and approved in writing by the Local Planning Authority together with proposals to control and manage construction traffic using the 'Construction Traffic Access Route' and to ensure no other local roads are used by construction traffic.

Reason: In the interests of maintaining highway efficiency and safety. This needs to be a pre-commencement condition as it deals with safeguards associated with the construction period of the development.

SHC 29B: For the duration of the construction period all traffic associated with (the construction of) the development will comply with the Construction Traffic Management
Plan and use only the 'Construction Traffic Access Route' and no other local roads unless approved in writing with the Local Planning Authority.

Reason: In the interests of maintaining highway efficiency and safety.

SHC 30A: No works shall commence on site until the details of wheel cleaning facilities for construction vehicles have been submitted to and approved in writing by the Local Planning Authority.

Reason: To prevent extraneous material being deposited on the highway.

SHC 30B: For the duration of the construction period all traffic associated with the construction of the development permitted will use the approved wheel cleaning facilities provided referred to in Part A.

Reason: To prevent extraneous material being deposited on the highway.

SHC 39A: Notwithstanding the details indicated on the submitted drawings no works shall commence on site unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works as indicated on Bellamy Roberts drawing number 5111/1002 Rev A have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

SHC 39B: Prior to the first occupation of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

Informatives

Inf.1: It is an OFFENCE to carry out any works within the Public Highway, which includes a Public Right of Way, without the permission of the Highway Authority. This development involves work to the public highway that can only be undertaken within the scope of a Legal Agreement between the Applicant and the County Council. Please note that it is the Applicant's responsibility to ensure that, in addition to planning permission, any necessary Agreements under the Highways Act 1980 are also obtained. Advice on this matter can be obtained from the County Council's Highways Development Management Group based at County Hall in Norwich.

Public Utility apparatus may be affected by this proposal. Contact the appropriate utility service to reach agreement on any necessary alterations, which have to be carried out at the expense of the developer. If required, street furniture will need to be repositioned at the Applicants own expense.

www.norfolk.gov.uk
Inf.9: The applicant is advised that to discharge condition SHC 00 that the local planning authority requires a copy of a completed agreement between the applicant and the local highway authority under Section 38 of the Highways Act 1980 or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes.

General

The off-site works will be delivered by a Section 278 Agreement and the precise delivery mechanism will be determined as the works are brought forward. The applicant should be aware that there may be additional costs relating to the off-site works which will include a commuted maintenance amount as well as various fees including administration and supervision. The completed works will be subject to a Safety Audit and additional works may be required.

Please be aware it is the applicants responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land. The highway boundary may not match the applicants title plan. Please contact the highway research team at highway.boundaries@norfolk.gov.uk for further details.

If you have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely

Liz Poole

Principal Engineer Major and Estate Development for Executive Director for Community and Environmental Services
Nigel Harriss

From: Head - Brundall Primary School <head@brundall.norfolk.sch.uk>
Sent: 23 July 2018 15:04
To: Nigel Harriss
Subject: RE: planning application ref:20171386 land east of the memorial hall Brundall

Dear Mr Harriss

Further to our original comment on the subject Planning Application, the Governors thought it would be helpful to provide an update on our capacity for the next academic year starting September 2018.

Our class structure is such that for the year 2018/19 our Early Years/Key Stage 1 is full and in Key Stage 2 we only have spaces in Year 5. As previously noted, if our intake numbers remain at current levels this situation will not improve.

As such, the concerns expressed in our original submission regarding further developments remain unchanged.

We would also highlight concerns around the local road network which is already problematic in and around the school at drop off/pick up times as well as when school events are held. Parking along The Street and surrounding roads near the school at these times means that through traffic regularly comes to a standstill and local residents have difficulty leaving/accessing their driveways. It would therefore seem highly likely that the problems currently experienced would be further exacerbated with further development.

I hope this update is helpful but should you require further clarification please don’t hesitate to contact me.

Yours sincerely

Rick Stuart-Sheppard
Head
Brundall Primary School

From: Head - Brundall Primary School
Sent: 29 September 2017 15:41
To: 'nigel.harriss@broadland.gov.uk'
Subject: planning application ref:20171386 land east of the memorial hall Brundall

Dear Mr Harriss

PLANNING APPLICATION 20171386 - LAND EAST OF THE MEMORIAL HALL, BRUNDALL

I write in respect of the above Planning Application to provide some information relating to capacity at Brundall Primary School, following discussion on the matter at our recent Board of Governors Meeting.

The Board of Governors has been conscious of a number of new housing developments both in Brundall and the wider local area, most notably within the neighbouring village of Blofield.

The School’s ‘Planned Admission Number’ (PAN) is 45, which requires us to have a number of mixed age classes. Our class structure has to be very carefully managed each year. The starting point for our structure relates to the number of children joining the school in Reception as there is a mandatory maximum class size of 30 for Reception / Year 1.
For September 2017 we have a full admission in Reception, and the resulting class structure means that our Early Years/Key Stage 1 (Reception, Year 1 and Year 2) is full. If we continue to have a full Reception intake in the next few years, Key Stage 1 will remain full.

Our Key Stage 2 (Years, 3, 4, 5 and 6) has a slightly more mixed picture, our Year 5 class is full, and there are some spaces in Year 6 (albeit new arrivals in Year 6 are rare). Our Year 3 and 4 age groups are in 3 mixed classes and as such we have limited places available across the 2 year groups in the current mixed class structure. However, the situation in Key Stage 1 noted above, means that in the next 2-3 years as the cohorts move up the school, Key Stage 2 will be full based on current intake numbers.

Our roll has been steadily rising in recent years, having gone from 223 in 2014 to 270 at the present time - a 21% increase. We are mindful that the school is not just affected by new housing in Brundall but there is also an impact from the numerous housing developments in Blofield and other nearby villages. Blofield school currently has a one form intake of 30 and is already at capacity and oversubscribed. The same is also true of our feeder High School, Thorpe St Andrew School & 6th Form which has a Year 7 PAN of 300 and publicly reported information shows it is oversubscribed for the current year.

We have seen an increasing number of place enquiries within the year. While we always do our best to accommodate such admission requests, unfortunately on a number of occasions we have had to refuse a place due to being at capacity in a particular class/year group.

We are told anecdotally that developers are highlighting the Good/Outstanding Schools in the area as part of their marketing, however, the reality is that there is either no or limited space at the schools in question.

We are already looking at ways to maximise our existing physical space to accommodate our immediate/short term needs due to our rising numbers and the nature and size of our site is such that adding more buildings to the site is not feasible. The Board of Governors is therefore very concerned that it is already going to be a challenge to accommodate additional pupils moving into the developments which have recently been completed/are currently under construction and, as such, feel that any further new developments will place our school and neighbouring schools under further unsustainable pressure, which will have a negative impact on the quality of provision we are able to deliver.

Yours sincerely

Rick Stuart-Sheppard
Headteacher
Brundall Primary School
Braydeston Avenue
Brundall
Norfolk
NR13 5JX
Hi Nigel

Thank you for this and now seems to revert back to the originally agreed delivery – which will be acceptable.

Best wishes
Kay

---

Kay Oglieve-Chan
Housing Enabler
Broadland District Council

Tel: 01603 430639
Fax: 01603 430583
www.broadland.gov.uk
kay.oglieve-chan@broadland.gov.uk

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Hi Kay,

Further to below please find updated AH position from applicant:

**S106 Triggers**
In light of comments received, Quantum will accept and propose changes to the S106 HoTs as follows:

1. **Affordable housing** will be provided as part of the first phase, not held off until the completion of phase 1. Therefore 8 affordable units (33%) will be provided in phase 1 in accordance with the layout plan.

2. **The Cucumber Lane roundabout modifications** will be completed prior to the first occupation of dwellings.

3. The triggers associated with the Village Green and the Country Park open spaces will be amended. You will appreciate that the way the S106 is presently worded, the LPA has a choice to take the land and money to build (option 1), or to require Quantum to consult on a scheme and then build itself and transfer (Option 2). Under Option 2 the triggers for the completion of the schemes are set at 125 and 150 units. Following discussion, Quantum agrees to change the triggers (under Option 2) to 85 units and 110 units.

4. **The Equipped Children’s Play Area** will be provided when 50 dwellings are built.
The above changes should therefore respond to concerns expressed about community facilities being delivered too late into the delivery of the development. The above changes supersede the Quantum letter of 11 June 2018, where relevant.

Regards

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

DD: 01603 430529 | E: nigel.harriss@broadland.gov.uk | W: www.broadland.gov.uk

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From: Nigel Harriss
Sent: 06 July 2018 12:02
To: Kay Oglieve-Chan
Subject: RE: Land East of Memorial Hall,Brundall - 20171386

Hello Kay,

Further to below I have noted in the Draft Heads of Terms for S106 Agreement appended to the Applicants letter setting out the revised proposal [attached] that Phase I for 23 dwellings will not deliver any AH, with the 8 units being delivered in the balance of the development. Also to be noted is that the revised layout for Phase I still identifies the AH plots!

Do you wish to make further comment at this stage?

---

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

DD: 01603 430529 | E: nigel.harriss@broadland.gov.uk | W: www.broadland.gov.uk

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2
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From: Kay Oggie-Chan  
Sent: 19 June 2018 11:31  
To: Nigel Harriss  
Subject: RE: Land East of Memorial Hall, Brundall - 20171386

Hi Nigel

Thank you this is very helpful and ties up with what is expected.

Best wishes

Kay

Kay Oggie-Chan  
Housing Enabler  
Broadland District Council  
Monday - Thursday

From: Nigel Harriss  
Sent: 19 June 2018 11:28  
To: Kay Oggie-Chan  
Subject: RE: Land East of Memorial Hall, Brundall - 20171386

Kate - if you need to check things just to be sure the plots for AH are:

Plot no.

14  -  2 bed
15  -  3 bed (includes carport)
16  -  2 bed
18  -  3 bed
19  -  3 bed
20  -  2 bed
21  -  1 bed flat
22  -  1 bed flat

Nigel Harriss  
Area Planning Manager (East)  
Broadland District Council

DD: 01603 430529  |  E: nigel.harriss@broadland.gov.uk  |  W: www.broadland.gov.uk

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-----Original Message-----
From: Kay Oglieve-Chan
Sent: 18 June 2018 10:58
To: Nigel Harriss
Subject: RE: Land East of Memorial Hall, Brundall - 20171386

Hi Nigel

RE: Land East of Memorial Hall, Brundall - 20171386
Thank you for inviting me to comment on the revised plans for the above Outline application. I can see slight changes to the car parking and garaging (for the open market). As this is a tenure blind site the plots relating to the AH were not previously listed - but were assumed to be those lacking a garage.

However, there seems to be no indication of a reduction in AH and so I assume that these remain as specified within the original planning statement. Based on this the last advised AH mix was:-

ART X 6 units
2 x 1 bedroom 2 person flats (~50m2)
2 x 2 bedroom 4 person house types (77-78m2)
2 x 3 bedroom 6 person house types (94-99m2)

Intermediate units x 2
1 x 2 bedroom 4 person house types
1 x 3 bedroom 6 person house types

Best wishes
Kay

Kay Oglieve-Chan
Housing Enabler
Broadland District Council

Tel: 01603 430639
Fax: 01603 430583
www.broadland.gov.uk
kay.oglieve-chan@broadland.gov.uk

Monday - Thursday

-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 18 June 2018 10:21
To: Kay Oglieve-Chan
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk

In any correspondence, please quote the Council reference number, which is included in the attached letter.

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- Microsoft Word Viewer for Word attachments.
- Adobe Reader for PDF attachments.
Nigel Harriss

From: John Walchester
Sent: 18 July 2018 15:46
To: Nigel Harriss
Subject: RE: Application 20171386 Land East of the Memorial Hall, Brundall

The proposed informal and formal open space provision is above that which would normally be required of a housing scheme of this size and this benefit, given the shortfall of recreational provision in Brundall, is a significant material consideration. However, as currently set out in the agreement, the options involve the transfer of the land to the District Council. As the Council has not made a decision on whether it would wish to take on the land, I would have thought it difficult to make a decision on the application when the delivery of the development would seem to be dependent on the transfer. I would have thought that there would need to be an additional option, eg that if the District Council does not accept the transfer that it is undertaken by the Developer and managed by them in perpetuity eg through a management company.

Also related to the open space land, it is suggested that the open space incorporates SUDS and other utilities. If this is the case I would have thought that there should be reference to the maintenance of these facilities in perpetuity, presumably by the developer unless there is some payment for the maintenance included in the transfer agreement.

John Walchester
Spatial Planning Manager
Broadland District Council

Planning Application Fees are increasing on Wednesday 17th January 2018 by an average of 20%. The new fees will apply to all applications received on or after this date.

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From: Nigel Harriss
Sent: 13 July 2018 09:02
To: John Walchester
Subject: Application 20171386 Land East of the Memorial Hall, Brundall

Hello John,

You were going to look at the revised proposal and comment on the formal and informal open space matters.

Attached is the letter from the applicant - Quantum setting out a summary of their revised proposals including draft Heads of Terms.

I would appreciate your comments in due course

Nigel Harriss
Area Planning Manager (East)
Broadland District Council
https://www.facebook.com/BroadlandDistrictCouncil

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Dear Nigel

Please find attached my response letter regarding the above and also attached is the letter from Fenley.

Kind regards

Ian Roberts
Highway Transportation and Infrastructure Consultants

ITR/5111/sk

16th July 2018

Nigel Harris
Area Planning Manager (East)
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Norwich NR7 0DU

Dear Nigel

Re: Land East of the Memorial Hall, Brundall

Thank you for your email enclosing a local resident concern.

I have passed your email on to Fenley who undertook the RSA, as an independent Auditor and attach their response recently received. I set out my observations below:-

- There is no legal obligation to undertake a RSA.
- RSA’s are undertaken at the discretion of the relevant Highway Authority, in this instance this was Highways England and the County Highway Authority.
- The RSA was undertaken in accordance with the Policy and National Standards HD19/15.
- Highways England approved the RSA brief.
- The County Highway Authority and Highways England have accepted the conclusions of the RSA following extensive discussions and subsequently raised no objection or concerns to the highway improvements proposed. They are in agreement that those works would mitigate the traffic generated by the residential scheme proposed.

Whilst the RSA Team did not visit during the relevant peak hour, the designers of the scheme at Bellamy Roberts did observe the critical am peak hour period. The design and analysis was based upon both am and pm peak hour periods.

The design process fully accords with the requirements as set out by the Department of the Environment and HE procedures.

The conclusion of both the RSA, CHA and HE is that the scheme is acceptable and would be undertaken under a S278 Agreement.

I trust this provides you with sufficient comfort that the scheme has been fully audited and accepted by the relevant Highway Authorities in accordance with the current guidelines.

Yours sincerely

Ian Roberts MCIHT
Partner
(ianroberts@bellamyroberts.co.uk)

cc: James Ellis
Dear Mr Harris

Re: Application 20171386 Land East of the Memorial Hall, Brundall.

Further to receipt of your email dated 13th July 2018 from Mr Ian Roberts of Bellamy Roberts, I can confirm that we observed the infrastructure and traffic conditions at the Cucumber Lane, Yarmouth Road roundabout junction with the A47 for a 90-minute period, commencing at 12:20pm on Friday 16th March 2018.

The site visit was undertaken in accordance with the Approved Audit Brief which suggested at item h) that, there was no requirement for the site to be visited at any particular time of the day.

We invariably consider the time of the day for our site visits and chose to visit the site around midday to early afternoon and not during the general peak hours as traffic conditions are lighter and more free flowing. It was therefore considered, that the observations would be more consistent with how drivers interact within the local highway network throughout the week. As fully competent auditors, we are trained to scrutinise and examine proposals, considering all conditions be it when the highway network is congested or free flowing, the weather is sun, rain or snow, as well as all combinations of highway users and do not exclusively rely on the conditions observed during the site visit.

In any case, prior to committing to the time of the site visit, the Audit Team reviewed the Audit Brief and Personal Injury Accident (PIA) data that was included. The data showed that 65% of the road traffic incidents that resulted in personal injury and were attended to by the Local Constabulary, took place during off-peak hours to include one that resulted in serious injuries and another in a fatality. In terms of the detailed review, of the 8 incidents that were recorded to have taken place during the peak periods; 37.5% were the result of rear shunts, 37.5% took place when a driver / rider lost control and 25% occurred as a vehicle turned right across the path of another on the roundabout. The type and location of the incidents noted above, were consistent with the incidents that occurred during off-peak hours albeit there was a slightly higher percentage of incidents occurring as a result of a vehicle turning right across the path of another on the roundabout during off-peak hours.

It was therefore felt that, observations during off-peak hours would be sufficient to undertake the Stage 1 Road Safety Audit which assessed the road safety implications of the proposed widening of the Cucumber Lane and Yarmouth Road approach as well as the provision of circulatory road markings.

I trust that this confirmation is helpful and satisfies the validity of the Stage 1 Road Safety Audit, which was undertaken in full accordance with National Standards detailed in HD19/15.

Yours sincerely

Jamie Fenning
For and on behalf of Fenley
Nigel Harriss

From: Kate Knights
Sent: 13 July 2018 14:38
To: Nigel Harriss
Subject: Land East of the Memorial Hall - application no: 20171386

Dear Nigel,

Thanks for consulting me on this application. My previous concerns primarily related to the harm that the development would cause to the setting of the grade I listed church of St Andrew and St Peter in Blofield, by blocking and encroaching upon this view that is also protected through Policy 3 of the Brundall Neighbourhood Plan. Amendments have been made to the footprint of the development to push it back slightly at its north-western corner. This should mean that the view of the church from the northern end of Links Avenue is no longer blocked by the development and will not encroach upon it to the same extent as it previously did when viewed from the Memorial Hall. Given the open-nature that will be retained across much of the site, it is considered that although there will be some change to the setting of the church this will not be harmful, although it will still be important that the perimeter of the area of housing is well-designed to integrate the development into the landscape successfully.

Regards,

Kate

Kate Knights
Historic Environment Officer
Broadland District Council
Tel: 01603 430507

Please note I work Tuesday / Wednesday / Thursday / Friday 9am-3pm

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Dear Mr Harris,

OUTLINE PLANNING APPLICATION WITH THE DETAILS OF APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED FOR LATER DETERMINATION, WITH THE EXCEPTION OF PHASE 1 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 AND/OR INFORMAL 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.

LAND EAST OF THE MEMORIAL HALL, BRUNDALL, NORFOLK

Thank you for your consultation received on 18 June 2018. We have no additional comments to make. Please refer to our previous letter referenced AE/2017/121924/01-L01 and dated 05 September 2017. We ask that the conditions we requested in our previous response are included should permission be granted.

We trust this information is useful.

Yours sincerely,

[Signature]

Miss Charlie Christensen  
Planning Adviser

Direct dial 02084 745593  
Direct e-mail charlie.christensen@environment-agency.gov.uk
Dear Mr. Harriss

HYDRII APPLICATION - OUTLINE PLANNING APPLICATION WITH THE DETAILS OF APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED FOR LATER DETERMINATION. WITH EXCEPTION OF PHASE 1 FOR WHICH DETAILS OF ALL MATTERS IN RELATION TO THE 23 DWELLINGS WITHIN THAT PHASE ARE PROVIDED. DEVELOPMENT TO COMPRISUE UP TO 170 DWELLINGS, A COMMUNITY SPORTS PAVILION, A COUNTRY PARK. FORMAL OUTDOORS SPORTS PROVISION, ACCESS AND OTHER EARTHWORKS AND ENGINEERING WORKS. LAND EAST OF THE MEMORIAL HALL, BRUNDALL, NORFOLK

Thank you for your consultation dated 17 August 2017. We have inspected the application as submitted and have no objection to the planning application, providing that you are satisfied that the development would be safe for its lifetime and you assess the acceptability of the issues within your remit. Our letter contains detailed comments in relation to flooding.

Flood Risk

The applicant commissioned fluvial flood modelling of Witton Run, a designated Main River, which has demonstrated that the development itself has been sequentially sited within flood zone 1.

Our maps show the site boundary lies within fluvial Flood Zone 3a defined by the ‘Planning Practice Guidance: Flood Risk and Coastal Change’ as having a high probability of flooding. The proposal is for an 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, a community sports pavilion, a country park. Formal outdoors
sports provision, access and other earthworks and engineering works, which is classified as a 'more vulnerable' development, as defined in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance. We are satisfied that the flood risk assessment, prepared by Rossi Long Consulting, referenced 161068 and dated July 2016, and the Flood Modelling Assessment, prepared by Evans Rivers and Coastal, reference number 1656/RE/07-16/01 and dated July 2016, provides you with the information necessary to make an informed decision. In particular:

- Drawing SK-120 revision P3 shows all proposed development for Phase 1 lies within Flood Zone 1. This drawing also shows that ground floor levels shall be set at a minimum level of 6m AOD, which is above the modelled 1% annual probability (1 in 100 year) flood, inclusive of climate change, of 3.674m AOD.
- The access and egress route travels through Flood Zones 1 and therefore does have a safe route of access.
- Flood Storage Compensation is not required based upon the current proposals.
- Drawing 26007 06 Revision D, titled 'Development Parameters Plan 1 - Finished Ground Levels', implies that some alterations may be made to ground levels across the site. It is not clear from the information submitted whether or not these ground level alterations will be proposed within flood zones 2 or 3, but if they are, then further information will need to be submitted to us to demonstrate that flood risk will not be increased as a result of changes in ground levels.

We recommend the following conditions are appended to any planning permission granted.

**Condition**

All built development shall be provided within flood zone 1, as detailed on drawing SK-120 Revision P3, submitted in support of this application.

**Reason**

To reduce the risk of flooding to people and property.

**Condition 2**

No changes to ground levels within flood zones 2 and 3 (as identified on drawing SK-120 Revision P3), shall be commenced until further evidence, including updated modelling, has been provided to demonstrate that any changes to ground level will not result in increased flood risks on or off the site.

**Reason for condition 2**

To ensure flood risks, both on and off site, are not increased as a result of the development.
Sequential Test / and Exception Tests

The site is located within Flood Zone 1 with a ‘low probability’ of flooding, with less than a 1 in 1000 annual probability of river flooding in any year (<0.1%). Therefore, the Sequential and Exception Tests will not need to be undertaken as part of this planning application.

Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

Environmental Permitting Regulations 2010

The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river. The Wotton Run to the north of the site is designated a ‘main river’. Application forms and further information can be found at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. Anyone carrying out these activities without a permit where one is required, is breaking the law.

We trust this information is useful

Yours faithfully

[Signature]

Mr. Pat Abbott
Planning Advisor

Direct dial 0208 4748011
Direct e-mail pat.abbott@environment-agency.gov.uk
Dear Mr Harriss

Re: Land east of the Memorial Hall, Brundall (Hybrid) (Application 20171386)

This is a delegated response; and is made without prejudice.

This response should be read alongside our previous response to this application, dated 25 August 2017. The Mineral Planning Authority notes the contents of the 'Additional supporting information letter', dated 11 June 2018, from the applicant. In particular, the applicant's statement indicating that they wish to address mineral safeguarding issues through a suitably worded condition.

Sand and gravel deposits are identified on the BGS mapping as occurring on parts of the site.

As part of the Flood Risk Assessment, intrusive site investigations were undertaken on the site to establish ground conditions present on the site. Three trial pits were included in the original FRA and a number of additional trial pits have been carried out as part of the additional information submitted to support the application in June 2018.

The investigations carried out have proved sand and gravel deposits close to the surface on parts of the site. However, the information is limited to potential infiltration areas and does not cover the entirety of the application site, and does not include particle size distribution testing.

The County Council in its capacity as the Mineral Planning Authority (MPA) objects to the planning application (20171386) on this site unless:

A condition to require a Materials Management Plan-Minerals (MMP-M) to be prepared for the application site is included in any grant of planning permission. The purpose of the MMP-M is to estimate the quantities of material which could be extracted from groundworks (including infiltration basins) and reused.

The Mineral Planning Authority has published standing advice on mineral safeguarding for landowners, developers, agents and Local Planning Authorities, which can be found on the Norfolk County Council website at www.norfolk.gov.uk/nmwdff.

Continued...}
The wording of a suitable condition is included below.

Prior to the commencement of Phase 1 of the development hereby approved the following will be submitted to and approved in writing by the Local Planning Authority in consultation with the Mineral Planning Authority:

A) A Mineral Resource Assessment, which will be carried out to inform a Materials Management Plan-Minerals (MMP-M). The Mineral Resource Assessment will cover the whole of the application site area; as shown on the Site Location Plan (Reference 26007 03.1); and will include a written methodology for an intrusive site investigation, including Particle Size Distribution testing to determine if the site contains a viable mineral resource for prior extraction.

Assessment of the results of the Particle Size Distribution testing should refer to material class types in Table 6/1 of the Manual of Contract Documents for Highway Works: vol. 1: Specification for Highway Works Series 600, in order to identify potential suitability for use in the construction phases.

B) A Materials Management Plan-Minerals, which will consider the extent to which on-site materials which could be extracted during the proposed development would meet specifications for use on-site through the intrusive site investigations, testing and assessment.

The MMP-M should outline the amount of material which could be reused on site; and for material extracted which cannot be used on-site its movement, as far as possible by return run, to an aggregate processing plant.

The MMP-M will outline that the developer shall keep a record of the amounts of material obtained from on-site resources which are used on site and the amount of material returned to an aggregate processing plant.

The development shall then be carried out in accordance with the approved MMP-M. The developer shall provide an annual return of these amounts to the Local Planning Authority and the Mineral Planning Authority, or upon request of either the Local Planning Authority or Mineral Planning Authority.

REASON: To ensure that needless sterilisation of safeguarded mineral resources does not take place in accordance with the National Planning Policy Framework and Policy CS16 of the Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD 2010-2026.

Norfolk County Council as the statutory authority for Mineral Planning in Norfolk wishes to be kept informed as this proposal is progressed through the application process.

Conclusion
Norfolk County Council is objecting to the application 20171386 on the grounds of mineral resource safeguarding unless the proposed condition is included in any grant of planning permission. This is in its capacity as the Statutory Authority for mineral planning in Norfolk.

If you have any queries regarding this response please contact Richard Drake (Senior Planner, Minerals and Waste Policy) by email at richard.drake@norfolk.gov.uk or telephone 01603 222349.

Yours Sincerely

Caroline Jeffery
Principal Planner (Minerals and Waste Policy)
Dear Mr Harris,

Public Rights Of Way Consultee response regarding:
Outline planning application with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 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 and/or informal 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. Land East of Memorial Hall, Brundall

Thank you for your consultation regarding the above. Our previous comments remain valid:

We note that there are plans to ‘redirect’ Brundall Footpath 1 within the application. This will require an application to the relevant local authority asking it to use its powers under section 257 of the Town and Country Planning Act 1990. This application must be confirmed before any works are started that obstruct or remove the existing Public Right of Way. It should also be noted that it is not acceptable to divert a rural public footpath onto a footway beside a road.

It is also noted that there are new access provisions within the proposal. Clarification is required as to the future ongoing maintenance of these routes, for example: Is there a maintenance committee to be set up to look after the country park and its associated access and infrastructure?

Development should integrate into the existing highway network, be that roads, footways or Public Rights of Way. In this instance the application does provide good links to the wider Public Right of Way network. As such the development is likely to increase footfall, and therefore we would look to the developer to propose works to improve the footpaths. These proposals would need to be agreed in discussion with Norfolk County Council Environment Team.

Regards,

Sarah

Sarah Leece
Green Infrastructure Officer (Public Rights of Way)
Community and Environmental Services

Norfolk County Council
General Enquiries: 0344 800 8020 or information@norfolk.gov.uk

-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 18 June 2018 09:13
To: Leece, Sarah <sarah.leece@norfolk.gov.uk>
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk

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HI Nigel

Thank you for consulting me on the amended plans for the proposed development on land east of the Memorial Hall, Brundall.

Having studied the details my only additional comments at this stage would be the content of amended drawing No. 26007 06 E, which details the finished ground levels.

As highlighted in my previous comments the level changes shown would damage the roots of the existing trees if they were undertaken within the trees Root Protection Areas (RPA’s) and any increase or excavation of existing levels should be avoided within any RPA’s.

The construction of any proposed footpaths, play equipment or other new hardstanding or structures should also be placed outside the RPA’s, this should be quite straightforward to implement due to the scale of the site and available land.

BR
Mark

Mark Symonds
Conservation Officer
(Arboriculture & Landscape)
Broadland District Council

Tel: 01603 430452
Fax: 01603 430591
www.broadland.gov.uk
mark.symonds@broadland.gov.uk
Dear Mr Harriss

Infrastructure Requirements: Proposed Residential Development
Land East of Memorial Hall, Brundall
Application No. 20171386

Thank you for consulting the County Council on the potential infrastructure, service and amenity requirements arising from the above proposal as they relate to matters covered in the County Council’s education, library, fire and green infrastructure projects. It is assumed that you have consulted the County Council separately as Highway Authority and as Lead Local Flood Authority.

The comments attached are made “without prejudice” and are an officer-level response to your consultation. The requirements are based on 170 dwellings.

It should be noted that the attached comments are only valid for six months from the above letter date and therefore the County Council would expect to be re-consulted if the proposal is not determined in this period.

While the County Council acknowledges that most infrastructure requirements would need to be funded through the Community Infrastructure Levy (CIL), some might still need to be funded either through a separate legal agreement (e.g. S106 agreement) and/or planning condition.

The County Council would have serious concerns if funding for the attached list of infrastructure requirements mitigating the impact of this development, could not adequately be addressed/delivered through CIL; S106 and/or condition.

Continued...
Please could you inform the planning obligations team when the application has a resolution to approve, either by committee or through delegated officer powers, so we can then instruct our solicitors as soon as possible in order to avoid any delay in the S106 process.

Please could you keep me informed of any obligations and/or conditions sought from the applicant; and forward the infrastructure requirements to your CIL distribution team.

Should you have any queries with the above comments please call me on (01603) 638422 or Stephen Faulkner (Principal Planner) on (01603) 222752.

Yours sincerely

Naomi Chamberlain
Trainee Planner

Encl
Address: Land East of Memorial Hall, Brundall
Application No. 20171386 (170 dwellings)
Date: 3rd July 2018

The following infrastructure will need to be funded through CIL

Education: Mitigation required at Early Education settings for 16 places, Blofield Primary and Brundall School for 44 places and at Thorpe St. Andrew School and Sixth Form for 32 places.

Library: Mitigation required at Blofield library to develop self-service system for local area.

Education:

Children generated from this development:

<table>
<thead>
<tr>
<th>Nursery school age: 16</th>
<th>High School age: 29</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary school age: 44</td>
<td>Sixth form age: 3</td>
</tr>
</tbody>
</table>

Current situation at the local schools:

<table>
<thead>
<tr>
<th>School</th>
<th>Capacity</th>
<th>Numbers on Roll (Jan 2018)</th>
<th>Spare capacity No. of places</th>
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</thead>
<tbody>
<tr>
<td>Early Education sector (2-4)</td>
<td>210</td>
<td>195</td>
<td>+15</td>
</tr>
<tr>
<td>Blofield Primary (4-11)</td>
<td>202</td>
<td>219</td>
<td>-17</td>
</tr>
<tr>
<td>Brundall School (4-11)</td>
<td>293</td>
<td>268</td>
<td>+25</td>
</tr>
<tr>
<td>Thorpe St. Andrew School and Sixth Form (11-18)</td>
<td>1726 (excluding mobiles)</td>
<td>1781</td>
<td>-55</td>
</tr>
</tbody>
</table>

Claim

Although there is currently spare capacity at Brundall School and at Early Education level, Blofield Primary School is already full and taking into account the permitted planning applications in both Blofield and Brundall primary schools will be full, as well as the Early Education sector.
Housing growth in the whole area and pupil number forecasts indicate that the Blofield and Brundall primary schools and the Early Education sector are likely to exceed their capacity. Brundall School is on a restricted site and it is unlikely that much expansion could happen there. With the prospective housing in the area we would need a further 100+ primary places which would put both Blofield and Brundall schools under pressure. And Thorpe St. Andrew School and Sixth Form is unable to accommodate the children generated from this proposed development should it be approved.

It is therefore expected that the funding for the additional school places required at Early Education, Primary and High School levels would be through CIL as this is covered on the District Council’s Regulation 123 list.

**Fire:** This development will require 1 fire hydrant per 50 dwellings at a cost of £818.50 per hydrant, which should be dealt with through condition.

**Library:** A development of 170 dwellings would place increased pressure on the library and mitigation is required to increase the capacity of the library.

**Green Infrastructure:**
Connections into the local Green Infrastructure (GI) network, including Public Rights of Way and ecological features, should be considered alongside the potential impacts of development. Direct mitigation and GI provision should therefore be included within the site proposal. Mitigation for new and existing GI features identified as strategic shall be funded by the Community Infrastructure Levy (CIL) through the Greater Norwich Investment Programme. These requirements for consideration and implementation, for both on and off-site GI provision, will help the local GI network to facilitate the development without receiving negative impact and equally, allow the development to integrate and enhance the existing network. Green Infrastructure within this proposal should respond to the Greater Norwich Green Infrastructure Strategy (2007) which informs the Joint Core Strategy, adopted January 2014. Development proposals are expected to fit with strategic visions for the area and respond to corridors as outlined in the Joint Core Strategy. Should this development intend to be the first phase of a larger development or vision, consideration will need to be given to how the local GI network will be impacted, adapted and enhanced in the future.
Dear Nigel Harriss

Please find a copy of the response attached for the planning application we received for 20171386 at Land East of Memorial Hall, Brundall.

Should you have any queries regarding our response please contact us at planningliaison@anglianwater.co.uk quoting reference 00028955.

Kind Regards

Developer Services Pre-Development Team
Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00028955
Local Planning Authority: Broadland District
Site: Land East of Memorial Hall, Brundall
Proposal: Hybrid Application – 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 (Class C2 and C3 Use); 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 Plans

Planning Application: 20171386

Prepared by: Pre-Development Team
Date: 03 July 2018

If you would like to discuss any of the points in this document please contact me on 0345 606 6087 or email planningliaison@anglianwater.co.uk
ASSETS

Section 1 – Assets Affected

1.1 There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted,

"Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991, or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

2.1 The foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre that will have available capacity for these flows

Section 3 – Foul Sewerage Network

3.1 The sewerage system at present has available capacity for these flows via a gravity discharge regime to manhole 1702. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

Section 4 – Surface Water Disposal

4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.
Section 5 – Trade Effluent

5.1 Not applicable
Sport England Ref: E/BRD/2017/47335/N

Thank you for consulting Sport England on the revisions to the above planning application.

Sport England previously commented by letter dated 4 December 2017, when we raised no objection subject to conditions in relation to any formal sports facilities to be provided. It was the view of Norfolk FA that formal provision for football would not be needed if planning consent is granted for application ref: 20161483. I understand that outline planning consent for this scheme was granted in March 2018. Taking this into account, Sport England would not raise an objection to the site description being widened to allow the provision of informal open pace, if there is no demand for formal sports pitches, taking into account the planning consent granted under ref: 20161483. We would support a more flexible approach being taken in terms of how the public open space is used.

Should the open space be used for formal sports provision we would require the conditions previously requested being imposed on any grant of planning permission, to ensure facilities are constructed to meet Sport England technical requirements.

I hope these additional comments are helpful in this instance.

If you wish to amend the wording of the recommended condition(s), or use another mechanism in lieu of the condition(s), please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Yours sincerely,

Philip Raiswell
Planning Manager

T: 020 7273 1824
M: 07769 741165
F: 020 7273 1981
E: Philip.Raiswell@sportengland.org

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printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England’s Privacy Statement may be found here https://www.sportengland.org/privacy-statement/ If you have any queries about Sport England’s handling of personal data you can contact Sport England’s Data Protection Officer directly by emailing gail.laughlan@sportengland.org

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Nigel Harriss

From: Bob Fell  
Sent: 02 July 2018 14:47  
To: Nigel Harriss  
Subject: Comments regarding the memorial hall site

Nigel

Thanks for the consultation letter. The proposals seem straight forwardly laid out, but given the history I think we should reserve our position until we have the parish council / memorial hall trust responses.

Couple of points for now.

The land transfers I believe should be between the owners and the parish to keep us out of the direct firing line for anything that goes wrong.

I note that the play area on Westfield Road / Meadow View is inside the red line but there is no comment in the proposals to say if this is being retained or not.

Cheers

Bob

Bob Fell
S106 Monitoring Officer
Broadland District Council

Normal working days Monday, Tuesday & Wednesday

Tel: 01603 430425
Bob.fell@broadland.gov.uk

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1
Dear Nigel,

21071386: Hybrid Application - Outline Planning application with the exception of Phase 1 for which details of all matters in relation to the 23 Dwellings, Land east of Memorial Hall, Brundall

Thank you for your email inviting comments on the above revised application. I have looked at the documents available and have no further comments to add.

Kind regards, Penny

Penny Turner

Architectural Liaison & Crime Reduction Officer
Broadland and North Norfolk
Sprowston Police Station
105-109 Wroxham Road
Norwich
NR7 8TU

Mobile: 07810813530
Email: turnerp@norfolk.pnn.police.uk

Click here for further Crime Reduction Advice

This e-mail carries a disclaimer

Go here to view Norfolk Constabulary

Disclaimer
Nigel Harriss

From: Adkins, Connor <Connor.Adkins@highwaysengland.co.uk>
Sent: 28 June 2018 15:04
To: Nigel Harriss
Cc: growthandplanning@transportplanning@dft.gsi.gov.uk
Subject: planning application 20171386
Importance: High

Dear Mr Harriss

Please find the attached Highways England comments on the above planning application.

Yours sincerely
Connor Adkins

Connor Adkins
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: +44 (0) 300 4704744
Web: http://www.highways.gov.uk
GTN: 0300 470 4744

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Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)
Formal Recommendation to an Application for Planning Permission

From: Martin Fellows
    Operations (East)
    planningee@highwaysengland.co.uk

To: Broadland District Council

CC: growthandplanning@highwaysengland.co.uk

Council’s Reference: 20171386

Referring to the planning application referenced above, dated 18 June 2018, application with details of appearance, landscaping, layout and scale reserved for later determination, with the exception of phase 1 are provided, development to comprise up to 170 dwellings and community/sports pavilion, a country park, formal and/or informal outdoor sport provision, access and other earthworks and engineering works, at land east of Memorial Hall, Brundall, Norfolk, notice is hereby given that Highways England’s formal recommendation is that we:

a) offer no objection;

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);

c) recommend that planning permission not be granted for a specified period (see Annex A—further assessment required);

d) recommend that the application be refused (see Annex A—Reasons for Recommending Refusal).

Highways Act Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.
Annex A

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Condition(s) to be attached to any grant of planning permission:

1. No part of the development shall be brought into beneficial use or occupation until the works referred to in paragraph 2 have been completed to the satisfaction of the Local Planning Authority in consultation with the Highways Authority on behalf of the Secretary of State for Transport.

2. Highway improvements to the A47 Yarmouth Road/Cucumber Lane junction as shown on

   Drawing No. 5111/1002 rev A dated 27/02/2018
   Drawing Title Suggested Improvements Option 2

   The design of the improvement shall be to requirements set out in the Design Manual for Roads and Bridges.

Reason

To ensure that the A47 Trunk Road continues to serve its purpose as part of a national system of routes for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety on the A47 and connecting roads.

The identified highway improvements arise from the findings of the Road Safety Audit undertaken by Fenley dated March 2018. Ref. RSA-17-147.
This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

This response represents our formal recommendations with regards to 20171386 and has been prepared by Eric Cooper
Planning Management
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Norwich
NR7 0DU

26th June 2018

Dear Sirs,

Outline planning application with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 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 and/or informal 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.
Land East of Memorial Hall, Brundall.

1. Thank you for the above consultation, I refer to your letter regarding the above outline planning application and advise that, following a review of the applicants’ submission the following comments are with regard to the Primary Healthcare provision on behalf of NHS England Midlands and East (East) (NHS England), incorporating North Norfolk and Norwich Clinical Commissioning Groups (CCG).

Review of Planning Application

2. The proposal comprises a development of up to 170 residential dwellings, which is likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would expect these impacts to be assessed and mitigated.

3. There are 2 surgeries within a 2km radius of the proposed development; Brundall Medical Partnership and Blofield Surgery. The catchment practices do not have resource capacity for the additional growth resulting from this development and proposed cumulative development in the area.

High quality care for all, now and for future generations
Healthcare Impact Assessment

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

5. The proposed development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. In order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, the proposed development should provide appropriate levels of mitigation.

Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising

6. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development’s impact. NHS England advise that healthcare contributions should be sought to contribute to the provision of sustainable primary care services in the area, particularly for the additional residents generated as a direct result of development growth.

7. It has been advised that Healthcare is not currently contained on Broadland Council’s CIL123 list, consequently, until this policy is addressed, it is confirmed mitigation cannot be obtained for primary healthcare. NHS England understands this matter is now being considered through the Greater Norwich Growth Board forum. NHS England and the CCG do not have funding to support development growth; therefore, it is essential this is resolved as a matter of priority, in order to effectively mitigate development impact and maintain sustainable primary healthcare services for the local communities of Broadland.

8. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.

9. It is noted that this development incorporates C2 use. We would be grateful if the council would keep us informed of the final determined use for these facilities to assist with capacity planning.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully

Kerry Harding
Head of Estates

High quality care for all, now and for future generations
From: Albone, James <james.albone@norfolk.gov.uk>
Sent: 22 June 2018 15:28
To: Planning Administration; Nigel Harriss
Subject: 20171386 Land East of Memorial Hall, Brundall [ME-180622-803306]

Our Ref: CNF47185_2

Dear Nigel,

20171386 Land East of Memorial Hall, Brundall

Thank you for consulting with us about the amended plans submitted for this application.

In our original response to this planning application (sent on 12/09/2017) we highlighted that no information had been submitted relating to the historic environment implications of the proposed development. This information has still not been provided and the current amendments do not alter our original advice.

Consequently we wish to restate our recommendations that, in accordance with paragraph 128 of National Planning Policy Framework the application should be supported by a heritage statement. In this instance an archaeological desk-based assessment alone is unlikely to provide any further information about the presence, form, surviving condition and significance of any heritage assets at the proposed development site. We therefore request that the results of an archaeological evaluation are submitted prior to the determination of the application in accordance with NPPF para. 128. In this case the evaluation should commence with a geophysical survey a brief for which can be obtained from Norfolk County Council Environment Service.

If you have any questions or would like to discuss our recommendations please do not hesitate to contact me.

Kind regards
James

Dr James Albone MCIfA
Historic Environment Senior Officer (Strategy & Advice)

Norfolk County Council Environment Service
Union House
Gressenhall, Dereham
Norfolk NR20 4DR

Direct dial: 01362 869279
Mob: 07769 887053
Direct Email: james.albone@norfolk.gov.uk

N.B. Please send all new site/application consultations, existing casework enquires where you are unclear who our case officer is, and reports for review to the general historic environment strategy and advice mailbox hep@norfolk.gov.uk

To see our email disclaimer click here http://www.norfolk.gov.uk/emaildisclaimer
Dear Mr N Harriss,

Town and County Planning (Development Management Procedure) (England) Order 2015

Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans at Land East of Memorial Hall, Brundall.

Thank you for your consultation on the above site, received on 13th June 2018. We have reviewed the application as submitted and wish to make the following comments.

We previously objected to this application due to concerns regarding the groundwater level as follows:

- Whilst we agreed that infiltration was a viable strategy for this site, our guidance (paragraph 16.6) states that to protect groundwater from pollution, any infiltration structure must be shown to be able to be constructed 1.2m above the anticipated seasonally high groundwater. Also referring to Gov.uk guidance on infiltration systems ‘you must make sure that there’s sufficient depth to the water table (at least 1.2m above the seasonally highest groundwater level) to make sure the effluent can attenuate. You should also consider how close receptors (like water supplies and surface watercourses) are.

The most important requirements to protect groundwater are that the discharge to a drainage field shouldn’t take place on land:

www.norfolk.gov.uk

Continued...
- within 10m of the nearest watercourse
- within 50m of a well, spring, borehole or other source of water intended for human consumption
- that's steeply sloping or waterlogged
- where there's less than 1.2m depth to water table below the invert of the drainage pipes
- where percolation rates fall outside an upper and lower range of values

We stated we would consider reviewing this objection if the following issue was adequately addressed.

- An alternative method of drainage should be provided if groundwater levels are proved to be unfavourable in the location of the proposed soakaway prove to be unfavourable during detailed design.

The applicant has now provided an email in response to our previous reply in support of this hybrid application (See appendix A). This suggests an alternative strategy to be proposed if further testing shows a 1.2m 'dry zone' cannot be achieved. The alternative of a connection to a watercourse is proposed with attenuation storage.

We have no objection subject to conditions being attached to any consent if this application is approved. We recognise that the Local Planning Authority is the determining authority, however to assist, we suggest the following wording:

Condition:
Prior to commencement of development, in accordance with the submitted FRA (Rossi Long Consulting Ref 161068 dated July 2016), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority in consultation with the Lead Local Flood Authority. The approved scheme will be implemented prior to the first occupation of the development. The scheme shall address the following matters

I. Detailed ground investigation should be undertaken including infiltration testing in accordance with BRE Digest 365 along the length of the proposed soakaways / infiltration basins, as stated within section 7.6 of the FRA / Drainage Strategy. This should be undertaken to establish the depth of the groundwater level, which should be a minimum of 1.2m below any infiltration structure.

II. If infiltration is not possible, provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 1 in 100 year return period, including allowances for climate change, flood event.

III. The design of any attenuation basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances.
IV. Finished ground floor levels of properties should be not less that 300mm above any sources of flooding (including fluvial flooding associated with the ordinary watercourse and the proposed drainage scheme) and not less that 150mm above surrounding ground levels.

V. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C697, 2007), or the updated The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.

Reason:
To prevent flooding in accordance with National Planning Policy Framework paragraph 103 and 109 by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the surface water drainage system operates as designed for the lifetime of the development.

Please note we would request comment on how in the future, any subsequent application for different phases of development considers how sustainable drainage relates to the surface water drainage strategy for the whole site. In particular, highlighting where different phases rely on each another for the disposal of surface water, how this will be implemented during construction and operation of the development.

If you, the Local Planning Authority review and wish to determine this application against our advice you should notify us, the Lead Local Flood Authority, by email at lifa@norfolk.gov.uk so that appropriate conditions can be placed on the development.

Alternatively, if further information is submitted, we request we are re-consulted and we will aim to provide bespoke comments within 21 days of the formal consultation date.

Yours sincerely,

Lucy

Lucy Perry
Flood Risk Officer

Lead Local Flood Authority

Disclaimer
We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.
Appendix A

The applicant has stated:

Infiltration testing has confirmed that ground conditions are suitable for the use of soakaways and permeable paving. The proposal is for the disposal of surface water run-off by infiltration following the hierarchy of drainage options in the National Standards for sustainable drainage systems. To protect groundwater from pollution the Lead Local Flood Authority has requested that any infiltration structure should be constructed 1.2m above the anticipated seasonally high groundwater level and further testing is required to confirm this. If further testing shows a 1.2m ‘dry zone’ cannot be achieved the alternative of a connection to a watercourse is proposed. This follows the hierarchy of drainage options and the outfall is within the site boundary. Attenuation storage will be provided in the form of a detention basin with the discharge to the watercourse limited to greenfield run-off rates. Where it is not possible to dispose of any additional volume of run-off, all run-off from the site will be discharged at a rate of 2 l/s / hectare or the annual peak flow rate (QBAR), whichever is the greater. For Phase 1 of the development the detention basin would replace Highway Infiltration Basin B at the same location.
Hi Nigel

Thank you this is very helpful and ties up with what is expected.

Best wishes
Kay

Kay Oglieve-Chan
Housing Enabler
Broadland District Council
Monday - Thursday

From: Nigel Harriss
Sent: 19 June 2018 11:28
To: Kay Oglieve-Chan
Subject: RE: Land East of Memorial Hall, Brundall - 20171386

Kate - if you need to check things just to be sure the plots for AH are:

Plot no.

14 - 2 bed
15 - 3 bed (includes carport)
16 - 2 bed
18 - 3 bed
19 - 3 bed
20 - 2 bed
21 - 1 bed flat
22 - 1 bed flat
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-----Original Message-----
From: Kay Oglieve-Chan
Sent: 18 June 2018 10:58
To: Nigel Harriss
Subject: RE: Land East of Memorial Hall, Brundall - 20171386

Hi Nigel

RE: Land East of Memorial Hall, Brundall - 20171386
Thank you for inviting me to comment on the revised plans for the above Outline application. I can see slight changes to the car parking and garaging (for the open market). As this is a tenure blind site the plots relating to the AH were not previously listed - but were assumed to be those lacking a garage.

However, there seems to be no indication of a reduction in AH and so I assume that these remain as specified within the original planning statement. Based on this the last advised AH mix was:-

ART X 6 units
2 x 1 bedroom 2 person flats (~50m2)
2 x 2 bedroom 4 person house types (77-78m2)
2 x 3 bedroom 6 person house types (94-99m2)

Intermediate units x 2
1 x 2 bedroom 4 person house types
1 x 3 bedroom 6 person house types

Best wishes
Kay

Kay Oglieve-Chan
Housing Enabler
Broadland District Council

Tel: 01603 430639
Fax: 01603 430583
www.broadland.gov.uk
kay.oglive-chan@broadland.gov.uk

Monday - Thursday

-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 18 June 2018 10:21
To: Kay Oglieve-Chan
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.
That's fine.

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

DD: 01603 430529 | E: nigel.harriss@broadland.gov.uk | W: www.broadland.gov.uk

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Dear Planning,

We (Brundall Primary School) would like an extension on replying as our Governing Body meet the night before.

Thank you

Rick Stuart-Sheppard
Brundall primary
Nigel Harriss

From: Stuart Moore
Sent: 18 June 2018 11:55
To: Nigel Harriss
Subject: FW: Land East of Memorial Hall, Brundall - 20171386

Nigel
I would suggest that you add a condition to require an assessment of the ground conditions on the site before commencement of the work. I think that K2 would be appropriate.

Could I also ask that you speak with the applicant regarding the air quality. While I am not aware of any specific data about the current air quality conditions in the area I think that the applicant needs to be able to demonstrate that the proposed development is not going to detrimentally impact the air quality in the area or at other areas (for example an increase in queuing traffic at the roundabout or at the Baybridge junction with the inclusion of a new road).

Thanks
Stuart

Stuart Moore
Pollution Control Officer
Broadland District Council

Tel: 01603 430511
Fax: 01603 430616
www.broadland.gov.uk
stuart.moore@broadland.gov.uk

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-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 18 June 2018 10:23
To: Stuart Moore
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk
Hello Lucy,

In reply to your letter of 6 June 2018 I attach, by way of reply, the response from the applicant’s drainage consultant.

I look forward to your reply.

Regards

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

DD: 01603 430529 | E: nigel.harriss@broadland.gov.uk | W: www.broadland.gov.uk

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Lucy Parry BEng(Hons) IEng MICE

Flood Risk Officer
Flood & Water Management Team
Community and Environmental Services

Team E-mail: water.management@norfolk.gov.uk
From: Nigel Harriss [mailto:nigel.harriss@Broadland.gov.uk]
Sent: 18 May 2018 14:45
To: Lead Local Flood Authority <llfa@norfolk.gov.uk>
Subject: RE: Land East of Memorial Hall, Brundall 20171386 [ME-180518-409671]

Hi Lucy,

Yes please if you could treat this as a re-consultation.

Thanks

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

DD: 01603 430529 | E: nigel.harriss@Broadland.gov.uk | W: www.broadland.gov.uk

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https://twitter.com/BroadlandDC

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From: Lead Local Flood Authority [mailto:llfa@norfolk.gov.uk]
Sent: 18 May 2018 11:25
To: planning
Subject: FW: Land East of Memorial Hall, Brundall 20171386 [ME-180518-409671]

FAO Nigel Harriss

Do you wish this to be a re-consultation?

Regards

Lucy Perry BEng(Hons) IEng MICE
Flood Risk Officer
Flood & Water Management Team
Community and Environmental Services
Dear Lucy,

I refer to your letter of 2nd February 2018 to Broadland District Council regarding the planning application at Brundall. You’ve objected to the planning application due to concerns that a 1.2m ‘dry zone’ cannot be achieved below the base of infiltration systems. In particular you note that the highway basins are set 1m above the predicted groundwater level and you have requested further evidence on groundwater levels which will require additional site investigation. Our client has asked the LPA if these further investigations can be covered by a suitable planning condition and Nigel Harriss has suggested that we contact you to discuss this as an option.

We believe that a suitable planning condition could be appropriate in this instance as there are alternative surface water disposal options available to the developer if groundwater levels were later seen to be a problem. Table 26.2 of the SuDS Manual shows pollution hazard indices for residential roofs as ‘very low’ and for estate roads and parking areas as ‘low’, and we have in the past used a reduced depth of dry zone where it can be shown that the risk to groundwater is low. This is because infiltration is still seen as the most favourable option for run-off. If required, any reduction in the dry zone could be sanctioned by the EA under an Environmental Permit. If at this stage infiltration is still not considered to be viable the developer has the alternative option of attenuation storage and discharge to the watercourse at greenfield run-off rates. The route to the watercourse is all within the red line site boundary.

The following wording has been suggested and we’d welcome your review and advice on whether this can form the basis of a suitable planning condition.

_No development shall take place until a Surface Water Drainage Strategy, based on sustainable drainage principles, has been submitted to and approved in writing by the LPA in consultation with Norfolk County Council in their role as Lead Local Flood Authority. The Strategy should identify how an unsaturated zone of 1.2m is maintainable beneath the base of an infiltration feature, and where this cannot be achieved, what the alternative strategy is. It should also set-out in more detail how the phases of the development might be related and how this relationship will be managed through the construction phase and into the operational phase, and how the surface water drainage system will be managed and maintained in the long-term. Following approval of the Strategy, any revised Strategy that should be produced shall also be submitted and approved in writing by the LPA._

Kind Regards

Bob Coe
Associates
Rossi Long Consulting Ltd
16, Meridian Way, Norwich, NR7 0TA
To see our email disclaimer click here http://www.norfolk.gov.uk/emaildisclaimer
Dear Nigel,

Further to our email below I understand that Lucy Perry at the LLFA has indicated that a suitable planning condition would be acceptable subject to receiving a brief statement which identifies the alternative SW strategies should the testing indicate elevated groundwater levels. Accordingly we would confirm the following:

Infiltration testing has confirmed that ground conditions are suitable for the use of soakaways and permeable paving. The proposal is for the disposal of surface water run-off by infiltration following the hierarchy of drainage options in the National Standards for sustainable drainage systems. To protect groundwater from pollution the Lead Local Flood Authority has requested that any infiltration structure should be constructed 1.2m above the anticipated seasonally high groundwater level and further testing is required to confirm this. If further testing shows a 1.2m ‘dry zone’ cannot be achieved the alternative of a connection to a watercourse is proposed. This follows the hierarchy of drainage options and the outfall is within the site boundary. Attenuation storage will be provided in the form of a detention basin with the discharge to the watercourse limited to greenfield run-off rates. Where it is not possible to dispose of any additional volume of run-off, all run-off from the site will be discharged at a rate of 2 l/s / hectare or the annual peak flow rate (QBAR), whichever is the greater. For Phase 1 of the development the detention basin would replace Highway Infiltration Basin B at the same location.

We trust this statement will be sufficient for the LLFA to remove their objection in favour of a suitable planning condition.

Kind Regards

Bob Coe
Associate
Rossi Long Consulting Ltd
16, Meridian Way, Norwich, NR7 0TA

T 01603 706420
M 07775 508850
E bob.coe@rossilong.co.uk
www.rossilong.co.uk
Dear Lucy,

I refer to your letter of 2\textsuperscript{nd} February 2018 to Broadland District Council regarding the planning application at Brundall. You’ve objected to the planning application due to concerns that a 1.2m ‘dry zone’ cannot be achieved below the base of infiltration systems. In particular you note that the highway basins are set 1m above the predicted groundwater level and you have requested further evidence on groundwater levels which will require additional site investigation. Our client has asked the LPA if these further investigations can be covered by a suitable planning condition and Nigel Harriss has suggested that we contact you to discuss this as an option.

We believe that a suitable planning condition could be appropriate in this instance as there are alternative surface water disposal options available to the developer if groundwater levels were later seen to be a problem. Table 26.2 of the SuDS Manual shows pollution hazard indices for residential roofs as ‘very low’ and for estate roads and parking areas as ‘low’, and we have in the past used a reduced depth of dry zone where it can be shown that the risk to groundwater is low. This is because infiltration is still seen as the most favourable option for run-off. If required, any reduction in the dry zone could be sanctioned by the EA under an Environmental Permit. If at this stage infiltration is still not considered to be viable the developer has the alternative option of attenuation storage and discharge to the watercourse at greenfield run-off rates. The route to the watercourse is all within the red line site boundary.

The following wording has been suggested and we’d welcome your review and advice on whether this can form the basis of a suitable planning condition.

\textit{No development shall take place until a Surface Water Drainage Strategy, based on sustainable drainage principles, has been submitted to and approved in writing by the LPA in consultation with Norfolk County Council in their role as Lead Local Flood Authority. The Strategy should identify how an unsaturated zone of 1.2m is maintainable beneath the base of an infiltration feature, and where this cannot be achieved, what the alternative strategy is. It should also set-out in more detail how the phases of the development might be related and how this relationship will be managed through the construction phase and into the operational phase, and how the surface water drainage system will be managed and maintained in the long-term. Following approval of the Strategy, any revised Strategy that should be produced shall also be submitted and approved in writing by the LPA.}

Kind Regards

\textbf{Bob Coe}
Associate
Rossi Long Consulting Ltd
16, Moridian Way, Norwich, NR7 0TA

T 01603 706420
M 07775 508850
E bob.coe@rossilong.co.uk
www.rossilong.co.uk
Dear Mr N Harriss,

Town and County Planning (Development Management Procedure) (England) Order 2015

Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans at Land East of Memorial Hall, Brundall.

Thank you for your consultation on the above site, received on 18th May 2018. We have reviewed the application as submitted and wish to make the following comments.

We previously objected to this application due to concerns regarding the groundwater level as follows:

- Whilst we agreed that infiltration was a viable strategy for this site, our guidance (paragraph 16.6) states that to protect ground water from pollution, any infiltration structure must be shown to be able to be constructed 1.2m above the anticipated seasonally high groundwater. Also referring to Gov.uk guidance on infiltration systems ‘you must make sure that there’s sufficient depth to the water table (at least 1.2m above the seasonally highest groundwater level) to make sure the effluent can attenuate. You should also consider how close receptors (like water supplies and surface watercourses) are.

The most important requirements to protect groundwater are that the discharge to a drainage field shouldn’t take place on land:

www.norfolk.gov.uk
- within 10m of the nearest watercourse
- within 50m of a well, spring, borehole or other source of water intended for human consumption
- that’s steeply sloping or waterlogged
- where there’s less than 1.2m depth to water table below the invert of the drainage pipes
- where percolation rates fall outside an upper and lower range of values’

We stated we would consider reviewing this objection if the following issue was adequately addressed:

- Due to the variable groundwater levels for this site further evidence should be provided to show that an unsaturated zone of 1.2m is maintainable beneath the base of any infiltration feature. If it is not possible to maintain a 1.2m unsaturated zone beneath the base of any infiltration feature, an alternative strategy should be provided. Also it is recommended that the EA be consulted.

The applicant has now provided an email in response to our previous reply in support of this hybrid application (See appendix A). This suggests that a condition be set with regards to our concerns.

We will consider reviewing this objection and setting conditions if the following issues are adequately addressed:

- An alternative method of drainage should be provided if groundwater levels are proved to be unfavourable in the location of the proposed soakaway prove to be unfavourable during detailed design

Please note we would request comment on how different phases rely on each other for the disposal of surface water (for example access road drainage) and how this will be implemented during construction and operation of the development

If you, the Local Planning Authority review and wish to determine this application against our advice you should notify us, the Lead Local Flood Authority, by email at lifa@norfolk.gov.uk so that appropriate conditions can be placed on the development.

Alternatively, if further information is submitted, we request we are re-consulted and we will aim to provide bespoke comments within 21 days of the formal consultation date.

Yours sincerely,

Lucy

Lucy Perry
Flood Risk Officer

Lead Local Flood Authority
www.norfolk.gov.uk

Continued...
Disclaimer
We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.
Appendix A

The applicant has stated:

“I refer to your letter of 2nd February 2018 to Broadland District Council regarding the planning application at Brundall. You’ve objected to the planning application due to concerns that a 1.2m ‘dry zone’ cannot be achieved below the base of infiltration systems. In particular you note that the highway basins are set 1m above the predicted groundwater level and you have requested further evidence on groundwater levels which will require additional site investigation. Our client has asked the LPA if these further investigations can be covered by a suitable planning condition and Nigel Harriss has suggested that we contact you to discuss this as an option.

We believe that a suitable planning condition could be appropriate in this instance as there are alternative surface water disposal options available to the developer if groundwater levels were later seen to be a problem. Table 26.2 of the SuDS Manual shows pollution hazard indices for residential roofs as ‘very low’ and for estate roads and parking areas as ‘low’, and we have in the past used a reduced depth of dry zone where it can be shown that the risk to groundwater is low. This is because infiltration is still seen as the most favourable option for run-off. If required, any reduction in the dry zone could be sanctioned by the EA under an Environmental Permit. If at this stage infiltration is still not considered to be viable the developer has the alternative option of attenuation storage and discharge to the watercourse at greenfield run-off rates. The route to the watercourse is all within the red line site boundary.

The following wording has been suggested and we’d welcome your review and advice on whether this can form the basis of a suitable planning condition.

No development shall take place until a Surface Water Drainage Strategy, based on sustainable drainage principles, has been submitted to and approved in writing by the LPA in consultation with Norfolk County Council in their role as Lead Local Flood Authority. The Strategy should identify how an unsaturated zone of 1.2m is maintainable beneath the base of an infiltration feature, and where this cannot be achieved, what the alternative strategy is. It should also set-out in more detail how the phases of the development might be related and how this relationship will be managed through the construction phase and into the operational phase, and how the surface water drainage system will be managed and maintained in the long-term. Following approval of the Strategy, any revised Strategy that should be produced shall also be submitted and approved in writing by the LPA.”
Nigel Harriss

From: Lead Local Flood Authority <llfa@norfolk.gov.uk>
Sent: 02 February 2018 08:51
To: Nigel Harriss
Subject: RE: Land east of Memorial Hall Brundall - 20171386
Attachments: FWP 17 5 6005  Response.pdf

Please find attached our response to this application.

Regards

Lucy Perry

Flood Risk Officer
Flood & Water Management Team
Community and Environmental Services

Email: water.management@norfolk.gov.uk

Norfolk County Council
General enquiries: 0344 800 8020 or information@norfolk.gov.uk

From: Nigel Harriss [mailto:nigel.harriss@Broadland.gov.uk]
Sent: 25 January 2018 10:18
To: Lead Local Flood Authority <llfa@norfolk.gov.uk>
Subject: RE: Land east of Memorial Hall Brundall - 20171386

Hello Lucy,

That’s concerning, please find attached my email to the LLFA in November.

Can I ask you to review the revised FRA on our website as a matter of urgency?

Many thanks

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

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

Planning Application Fees are increasing on Wednesday 17th January 2018 by an average of 20%. The new fees will apply to all applications received on or after this date.
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From: Lead Local Flood Authority [mailto:llfa@norfolk.gov.uk]
Sent: 25 January 2018 10:12
To: Nigel Harriss
Subject: RE: Land east of Memorial Hall Brundall - 20171386

Nigel,

I can’t find this on our system. The last record we have of this is in September 2017...

Regards

Lucy Perry BEng(Hons) IEng MICE
Flood Risk Officer
Flood & Water Management Team
Community and Environmental Services
Team E-mail: water.management@norfolk.gov.uk

Norfolk County Council
General enquiries: 0344 800 8020 or information@norfolk.gov.uk

---

From: Nigel Harriss [mailto:nigel.harriss@broadland.gov.uk]
Sent: 25 January 2018 10:01
To: Lead Local Flood Authority <llfa@norfolk.gov.uk>
Subject: Land east of Memorial Hall Brundall - 20171386

Good morning,

We sent you a revised FRA on 21 November 2017 regarding the above site and have heard nothing further. Can you update me please?

Thanks

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

Tel: 01603 430529
www.broadland.gov.uk
nigel.harriss@broadland.gov.uk
Planning Application Fees are increasing on Wednesday 17th January 2018 by an average of 20%. The new fees will apply to all applications received on or after this date.

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To see our email disclaimer click here http://www.norfolk.gov.uk/emaildisclaimer
Dear Mr N Harriss,

Town and County Planning (Development Management Procedure) (England) Order 2015

Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans at Land East of Memorial Hall, Brundall.

Thank you for your consultation on the above site, received on 25th January 2018. We have reviewed the application as submitted and wish to make the following comments.

The applicant has provided a covering letter and a Flood Risk Assessment (FRA) response to our previous reply in support of this hybrid application. This includes further infiltration testing, a revised drainage strategy, additional calculations for the whole drainage network, revised layouts – showing exceedance flows and a Management and maintenance plan.

To protect ground water from pollution, any infiltration structure must be shown to be able to be constructed 1.2 m above the anticipated seasonally high groundwater level. The revised drainage strategy replaces deep soakaways with shallower domestic soakaways, swales and infiltration basins in response to our concerns. The highway infiltration basins are now set 1m above predicted ground water level.

A maintenance and management plan has been provided detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for www.norfolk.gov.uk

Continued...
the lifetime of the development. The Local Planning Authority should note that there are long term practicality issues for maintaining soakaways with shared maintenance responsibilities, which potentially could be within the back gardens of properties and not within public open space to allow easy access. They may also wish to consider if permitted development rights are removed to prevent accidental damage to the structures or building over them.

We object to this planning application in the absence of acceptable supporting information relating to:

- Whilst we agree that infiltration is a viable strategy for this site, our guidance (paragraph 16.6) states that to protect ground water from pollution, any infiltration structure must be shown to be able to be constructed 1.2m above the anticipated seasonally high groundwater. Also referring to Gov.uk guidance on infiltration systems ‘you must make sure that there’s sufficient depth to the water table (at least 1.2m above the seasonally highest groundwater level) to make sure the effluent can attenuate. You should also consider how close receptors (like water supplies and surface watercourses) are.

The most important requirements to protect groundwater are that the discharge to a drainage field shouldn’t take place on land:

- within 10m of the nearest watercourse
- within 50m of a well, spring, borehole or other source of water intended for human consumption
- that’s steeply sloping or waterlogged
- where there’s less than 1.2m depth to water table below the invert of the drainage pipes
- where percolation rates fall outside an upper and lower range of values’

Reason
To prevent flooding in accordance with National Planning Policy Framework paragraph 103 and 109 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the surface water drainage system operates as designed for the lifetime of the development.

We will consider reviewing this objection if the following issues are adequately addressed.

- Due to the variable groundwater levels for this site further evidence should be provided to show that an unsaturated zone of 1.2m is maintainable beneath the base of any infiltration feature. If it is not possible to maintain a 1.2m unsaturated zone beneath the base of any infiltration feature, an alternative strategy should be provided. Also it is recommended that the EA be consulted.
We would request comment on how different phases rely on each other for the disposal of surface water (for example access road drainage) and how this will be implemented during construction and operation of the development.

Further guidance on the information required by the LLFA from applicants can be found at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers.

If you, the Local Planning Authority review and wish to determine this application against our advice you should notify us, the Lead Local Flood Authority, by email at llfa@norfolk.gov.uk so that appropriate conditions can be placed on the development.

Alternatively, if further information is submitted, we request we are re-consulted and we will aim to provide bespoke comments within 21 days of the formal consultation date.

Yours sincerely,

Lucy Perry
Flood Risk Officer
Lead Local Flood Authority

Disclaimer
We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.
planning

From: Poole, Liz <liz.poole@norfolk.gov.uk>
Sent: 16 January 2018 13:23
To: Nigel Harriss; planning
Subject: Response To Application Number 20171386 at BRUNDALL - Land East of Memorial Hall [ME-180116-359499]
Attachments: Response_20171386.pdf

Please find attached my representation in relation to the above planning application.

Regards

Liz Poole

To see our email disclaimer click here <a href="http://www.norfolk.gov.uk/emaildisclaimer">http://www.norfolk.gov.uk/emaildisclaimer</a>
Dear Mr Harriss,

Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans. BRUNDALL - Land East of Memorial Hall.

Thank you for your consultation dated 17 August 2017. Further to my response of 23 October 2017 in which the Highway Authority raised a Holding Highway Objection, I have now reviewed the information provided by the applicant’s transport consultants in relation to a cumulative impact assessment of both this application and the Brooms Boats Application (2016/1483) which has a resolution to grant permission following December 2017’s committee.

The information has been supplied in the form of an Addendum which sets out the impact of all the currently consented/committed development in the Brundall/Blofield area and the impact of the Brooms Boats Application.

It is clear from the analysis submitted that the Cucumber Lane roundabout theoretically operates within capacity in 2018 with the addition of traffic from the Memorial Hall application on its own. However when traffic from the Memorial Hall application and the Brooms Boats application (which has a committee resolution to grant permission) are both applied the roundabout exceeds its capacity and queues form on both Cucumber Lane and Yarmouth Road in the AM peak.

In 2022, the roundabout is struggling with just the Base and Committed traffic with Cucumber Lane exceeding capacity. When the Memorial Hall traffic is applied the queue
increases on Cucumber Lane from 8 to 14 vehicles. However when both the Brooms Boats traffic and the Memorial Hall traffic are applied, both Yarmouth Road and Cucumber Lane experience significant queuing with queue lengths of 25 and 42 vehicles respectively.

Given that the Brooms Boats application has a committee resolution to grant planning permission and can be considered committed development, the Local Highway Authority considers that the additional traffic from the Memorial Hall application has a severe impact on the Cucumber Lane/A47(T) roundabout and therefore recommends that the application is refused on the following ground:

SHCR 31 (variation)

The application is supported by information that demonstrates that the proposed development would result in a severe residual impact on the Cucumber Lane/A47(T) roundabout and would be prejudicial to the satisfactory functioning of the highway. Contrary to National Planning Policy Framework Paragraph 32.

If you have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely,

Liz Poole

Principal Engineer - Major and Estate Development
for Executive Director for Community and Environmental Services

Please be aware it is the applicants responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land. The highway boundary may not match the applicants title plan. Please contact the highway research team at highway.boundaries@norfolk.gov.uk for further details.

www.norfolk.gov.uk
Hannah,

Attached is the formal record of the Habitat Regulation Assessment that the Natural Environment Team at NCC have undertaken on behalf of Broadland DC. I believe that the conclusions contained within it are sound, and that it addresses the issues raised by Natural England in their formal consultation response and as such we propose to adopt it as Broadlands formal HRA record of the proposal. Kate has the wireline drawings and will provide comments which I will make known to you when available.

We await the comments of the LLFA in response to the revised FRA.

We await the formal comments of NCC Highways in response to the TA Addendum.

My colleague, Charles Judson, has looked at the Open Space Provision/draft Heads of Terms and raised some questions – please see attached.

Sport England’s Comments are attached as well as those of Anglian Water.

I note there are revised plans on their way relating to matters raised with regards to the ‘full’ element of the proposal. And also as a consequence of the revised FRA.

Regarding your reference at para 7.6 in the Planning Statement to CIL Exceptional Circumstances Relief – BDC does not offer relief from liability to pay the CIL levy [see attached document]

In terms of representations received, I believe I have copied to you most if not all the statutory consultation replies. What I can do is make the working files available to you when you are here on 20 December and you can go through these and determine what if anything you would like copies of.

Regards

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

Tel: 01603 430529
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 following the approval of planning permission. The fees
will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure

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From: Hannah Leary [mailto:Hannah.Leary@bartonwillmore.co.uk]
Sent: 06 December 2017 10:32
To: Nigel Harriss
Cc: Robin Meakins
Subject: 26007-A3-Land East of the Memorial Hall, Brundall

Nigel,

I just wanted to take the opportunity to update you on the actions that are with us on Brundall. We have provided Kate Knights with the views requested and I understand that she is considering those and will liaise with you on that. We will be in a position to submit the amended drawings to you by the end of this week – they will deal with Ben Hogg’s comments, as well as those from NCC Highways, plus some minor amendments that we need make to reflect the content of the submission that we made to you regarding additional drainage information. We have also responded to you regarding the highways queries which arose from NCC Highways consultation response.

As you are aware, we would like the application to be presented to Members at your January Planning Committee. We therefore need to ensure that all outstanding matters have been dealt with. Aside from those actions listed above, could you advise me of any others matters that we need to address in order to ensure that we are on target to be presented to that Committee? As an aside, has the Habitats Regulation Assessment been undertaken by your colleague yet? If so, it would be helpful to have sight of this.

We would like to obtain a copy of all representations made in respect of the application. I’ve checked your website and note that you don’t post third party responses on your planning pages. Could you therefore advise how we go about obtaining copies of all of the letters of support and objection.

Thanks in advance.

Regards,

Hannah Leary
Associate

DDI: 0207 446 6888
M: 07824 359072
W: www.bartonwillmore.co.uk
7 Soho Square, London, W1D 3QB

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From: Nigel Harriss  
Sent: 21 November 2017 11:28  
To: 'Lead Local Flood Authority'  
Cc: Charles Judson  
Subject: RE: Land East of Memorial Hall, Brundall - 20171386

Please find attached the applicant's response to your objection.

I look forward to hearing from you further.

Regards

Nigel Harriss  
Area Planning Manager (East)  
Broadland District Council  

Tel: 01603 430529  
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 following the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure

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-----Original Message-----  
From: Lead Local Flood Authority [mailto:llfa@norfolk.gov.uk]  
Sent: 07 September 2017 09:58  
To: planning  
Subject: RE: Land East of Memorial Hall, Brundall - 20171386 [ME-170907-835134]

Good Morning,

Please find attached our response to this consultation.

Kind Regards,

Cathryn
Cathryn Brady

Assistant Flood Risk Officer
Community and Environmental Services
Lead Local Flood Authority

Email: ilfa@norfolk.gov.uk for any planning enquiries or statutory planning consultations
Email: water.management@norfolk.gov.uk for any reports of flooding, watercourse regulation or general enquiries.

Norfolk County Council general enquiries: 0344 800 8020, information@norfolk.gov.uk or www.norfolk.gov.uk

-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 16 August 2017 11:37
To: Lead Local Flood Authority <ilfa@norfolk.gov.uk>
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk

In any correspondence, please quote the Council reference number, which is included in the attached letter.

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- Microsoft Word Viewer for Word attachments.
- Adobe Reader for PDF attachments.

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Charles Judson

From: Nigel Harriss  
Sent: 14 November 2017 10:29  
To: 'Poole, Liz'; 'Galloway, Davina'  
Cc: Phil Courtier; Charles Judson  
Subject: FW: 26007-A3-Brundall-Transport Assessment Addendum  
Attachments: 171109_161068_Transport Assessment Addendum.pdf

Dear all,

Further to recent discussions I attach a Transport Assessment Addendum in support of application 20171386:

Land East of Memorial Hall, Brundall [Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans.

We have also requested that the applicants for the Brooms proposal also considers the worst case scenario [cumulative impacts factoring in the application above and no travel plan at the Cucumber Lane / A47 roundabout junction] in respect of application 20161483. They have agreed to do this but we have not received anything yet.

I look forward to hearing from you in relation to the TA Addendum.

Regards

Nigel Harriss  
Area Planning Manager (East)  
Broadland District Council

Tel: 01603 430529  
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 following the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure.

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From: Hannah Leary [mailto:Hannah.Leary@bartonwillmore.co.uk]
Sent: 13 November 2017 21:32
To: Nigel Harris
Cc: Luke Fairall; Alex Adams; Robin Meakins
Subject: 26007-A3-Brundall-Transport Assessment Addendum

Nigel,

Further to the recent discussions between yourself and Rossi Long, and NCC Highways, please find attached the
Transport Assessment Addendum. This responds to the queries raised by NCC Highways, and the additional points
that you identified through discussion. Please note that Rossi Long has been in touch with NCC Highways to let them
know that this is being submitted to you.

We look forward to hearing from you.

Regards,

Hannah Leary
Associate

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Sport England Ref: E/BRD/2017/47335/N

FAO Mr N Harriss

Dear Sirs

Thank you for consulting Sport England on the above application.

Sport England – Non Statutory Role and Policy


This application falls within the scope of the above guidance as it relates to the creation of new playing fields.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England’s planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Further information on Sport England’s planning objectives can be found here: http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/

The Proposal and Assessment against Sport England’s Objectives and the NPPF

This application seeks outline planning consent for up to 170 dwellings, plus community pavilion and formal outdoor sports provision. It is noted that planning consent has previously been granted for the change of use of part of this application site to playing field use, which has been renewed twice but not implemented. This proposal includes formal sports provision of 1.9 hectares which is indicatively shown as providing a grass football pitch and cricket square. This would be above the policy requirement for 1.0ha of space for formal open space.

I have consulted with the Football Foundation and Norfolk FA with regard to the proposed playing field provision, and they have commented that in their opinion there is unlikely to be a demand for additional grass football pitch provision in the locality if planning consent is granted for the new artificial grass pitch proposed as part of planning application ref: 20161483. It is understood that a decision has not yet been made in relation to that application. Sport England would recommend therefore that if planning consent is granted for application 20161483 (including the artificial grass pitch) then further consideration will need to be given to the provision of pitches on this site, to ensure there is no over provision of pitches for a particular sport.

It is also noted that the new playing fields could provide a cricket square to meet local demand for a cricket facility in the locality. The Broadland Playing Pitch Strategy (2014) did identify the need for a replacement cricket facility in the Brundall area, therefore this proposal could meet this identified demand. The outline plans do not indicate a proposed siting for a cricket facility, but this will need to take account of the residential development to the south of the proposed playing field area. Should planning consent be granted we would recommend that the applicant discusses this issue with Sport England (in consultation
with the England and Wales Cricket Board (ECB) to ensure that any impact on residential properties from cricket balls is minimised and the need for any mitigation (e.g. protective fencing/netting) is assessed. Sport England would therefore reserve the right to object to the reserved matters in relation to pitch layouts if it was considered any siting of pitches could adversely affect the amenity of adjoining existing or proposed residential properties (unless adequate mitigation measures are taken).

By providing new pitches that could help address established playing pitch deficiencies, the proposal would meet objective 3, and therefore Sport England supports this application in principle.

Sport England recommends that a ground conditions assessment is undertaken by a sports turf specialist/agronomist who can recommend a scheme for preparing the playing fields to the required specification. The recommended scheme should then be implemented. Detailed guidance on the issues that require consideration is set out in Sport England’s guidance ‘Natural Turf for Sport’, and .

A copy of this guidance can be found at: http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport/

Conclusion

This being the case, Sport England offers its support for this this application, as it is considered to meet Objective 3 as set out above, though further discussions will be needed to agree the type of pitches to be provided on this site.

Sport England recommends, based on our assessment, that if the Council is minded to approve the application, the following planning conditions should be imposed.

1. No development shall take place unless and until:
   a) A detailed assessment of ground conditions of the land proposed for the new/replaced/replacement playing field land as shown on drawing number xx shall be undertaken (including drainage and topography) to identify constraints which could affect playing field quality; and
   b) Based on the results of this assessment to be carried out pursuant to (a) above of this condition, a detailed scheme to ensure that the playing fields will be provided to an acceptable quality (including appropriate drainage where necessary) shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England.

   The works shall be carried out in accordance with the approved scheme within a timescale to be first approved in writing by the Local Planning Authority after consultation with Sport England.

   Reason: To ensure that site surveys are undertaken for new or replacement playing fields and that any ground condition constraints can be and are mitigated to ensure provision of an adequate quality playing field and to accord with LP Policy **

2. The playing field/artificial grass pitch shall be used for Outdoor Sport and for no other purpose (including without limitation any other purpose in Class D2 Use Classes Order 2005, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

   Reason: To protect the [playing field/artificial grass pitch] from loss and/or damage, to maintain the quality of and secure the safe use of sports pitch/es and to accord with LP Policy **.

3. Prior to the bringing into use of the playing fields a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England.
Reason: To ensure that new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport (National Planning Policy Framework (NPPF) para 74) and to accord with LP Policy **

If you wish to amend the wording of the recommended condition(s), or use another mechanism in lieu of the condition(s), please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Ours sincerely,

Philip Raiswell
Planning Manager

T: 020 7273 1824
M: 07769 741165
F: 020 7273 1981
E: Philip.Raiswell@sportengland.org

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From: Drake, Richard [mailto:richard.drake@norfolk.gov.uk]
Sent: 08 December 2017 15:38
To: Nigel Harris
Subject: RE: Land East of Memorial Hall, Brundall - 20171386 [ME-170825-573563]

Good Afternoon Nigel,

This application differs from the 'Pinebanks' application in not having had a Mineral Resource Assessment carried out as part of the application process. Please find below a condition to address the mineral safeguarding objection. Norfolk County Council in its capacity as the Mineral Planning Authority would remove its objection, subject to the inclusion of the condition in any grant of planning permission for this site.
If you have any queries please let me know.

Best regards
Richard

Prior to the commencement of Phase 1 of the development hereby approved the following will be submitted to and approved in writing by the Local Planning Authority in consultation with the Mineral Planning Authority:

A) A Mineral Resource Assessment will be carried out to inform a Materials Management Plan - Minerals (MMP-M). The Mineral Resource Assessment will cover the whole of the application site area; as shown on the Site Location Plan (Reference 26007.03.1); and will include a written methodology for an intrusive site investigation, including Particle Size Distribution testing to determine if the site contains a viable mineral resource for prior extraction.

Assessment of the results of the Particle Size Distribution testing should refer to material class types in Table 6/1 of the Manual of Contract Documents for Highway Works: vol. 1: Specification for Highway Works Series 600, in order to identify potential suitability for use in the construction phases.

B) The MMP-M will consider the extent to which on-site materials which could be extracted during the proposed development would meet specifications for use on-site through intrusive site investigations, testing and assessment.

The MMP-M should outline the amount of material which could be reused on site; and for material extracted which cannot be used on-site its movement, as far as possible by return run, to an aggregate processing plant.

The MMP-M will outline that the developer shall keep a record of the amounts of material obtained from on-site resources which are used on site and the amount of material returned to an aggregate processing plant.

The development shall then be carried out in accordance with the approved MMP-M.

The developer shall provide an annual return of these amounts to the Local Planning Authority and the Mineral Planning Authority, or upon request of either the Local Planning Authority or Mineral Planning Authority.

REASON: To ensure that needless sterilisation of safeguarded mineral resources does not take place in accordance with the National Planning Policy Framework and Policy CS16 of the Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD 2010-2026.
Dear Nigel,

We have now received the two photomontages showing the outline of the proposed development from the specified viewpoints (approximately).

These make clear that the proposed development will have an impact on the wider setting of the grade I listed church of St Andrew and St Peter in Blofield. Although it will clearly remain visible from some parts of the site, well-established viewpoints such as that from the northern end of Links Avenue will be lost and that from the east end of the Memorial Hall will be eroded by the proposed development. The NPPF (para 132) makes clear that the significance of a heritage asset can be harmed by development within its setting. This church is clearly significant for many reasons and the erosion of its significance as a local landmark and its relationship with this wider setting is considered to cause less than substantial harm to the setting of the building. The proposal should therefore be weighed against any public benefits as specified in para 134 of the NPPF.

Although not designated, this shallow valley acts as an important break in development between the historically distinct settlements of Brundall and Blofield and as such there will be some harm caused to the historic landscape of the area.

I'd be happy to discuss this next week if necessary.

Regards,

Kate

---

Please be aware that from 1 April 2017, Broadland District Council will charge for applications to approve details that are part of the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be reviewed.
FYA – note the subject is wrong, it relates to application 20171386

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

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

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From: planning
Sent: 16 November 2017 14:34
To: Nigel Harriss
Subject: FW: App Ref: 20161483 - Land at Yarmouth Road, Brundall [ME-171116-335170]

From: Planning Central [mailto:Planning_Central@sportengland.org]
Sent: 16 November 2017 13:43
To: planning
Subject: RE: App Ref: 20161483 - Land at Yarmouth Road, Brundall [ME-171116-335170]

Mr N Harriss
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Norwich
NR7 0DU

16 November 2017
Dear Mr N Harriss,

App Ref: 20171386
Site: Land East of Memorial Hall Highfield Avenue Norwich NR13 5NT
Proposal: Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans.

Thank you for consulting Sport England on the above application. I can confirm that the consultation has been received and was accepted on 14th November 2017.

In accordance with Paragraph 011 of NPPG (Article 22 of the Development Management Procedure (England) Order 2015), Sport England will respond to this consultation within 21 days of the date of acceptance.

However, if insufficient information is received in order to allow us to make a substantive response to the consultation, Sport England will contact you to request further information. The 21 day deadline will not commence until receipt of the additional information.

As a public body, Sport England is subject to the terms of the Freedom of Information Act 2000, which gives members of the public the right to access the information we hold. In the event of a request being received, we will be obliged to release information relating to the application and our response unless an exemption in the Act applies. You should therefore inform us if you believe any elements of your submission to be confidential or commercially sensitive so that we can take your concerns into account.

If you would like any further information or advice please contact the undersigned at the address below.

Yours sincerely,
Planning Administration Team
Planning Central
Planning.Central@sportengland.org

From: Charles Judson [mailto:Charles.Judson@broadland.gov.uk]
Sent: 14 November 2017 08:32
To: Philip Raiswell <Philip.Raiswell@sportengland.org>
Subject: RE: App Ref: 20161483 - Land at Yarmouth Road, Brundall

Dear Philip

Thank you for your email below. Unfortunately the correspondence you refer to relates to another application in Brundall which is also being considered in addition to that referred to in my email of 07/11/2017.

For the avoidance of doubt there are two major applications in Brundall:

20161483 – your comments of 15 September and correspondence with Phil Courtier have been noted.

20171386 – I cannot find record of any Sport England comments on this one.

Apologies for any confusion.

Many thanks

Charles

Charles Judson
Senior Planning Officer
Broadland District Council

Tel: 01603 430592
www.broadland.gov.uk
Charles.judson@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 following the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure.

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From: Philip Raiswell [mailto:Philip.Raiswell@sportengland.org]
Sent: 13 November 2017 11:12
To: Charles Judson
Subject: FW: App Ref: 20161483 - Land at Yarmouth Road, Brundall
Charles,

Further to your email of 7 November, Sport England made reps on this application by letter dated 15 September, and we have had subsequent correspondence with Phil Courtier (see our comments dated 12 October 2017) below.

Kind Regards,

Philip.

From: Philip Raiswell
Sent: 12 October 2017 10:54
To: 'Phil Courtier' <phil.courtier@broadland.gov.uk>
Cc: Nigel Harriss <nigel.harriss@broadland.gov.uk>
Subject: RE: App Ref: 20161483 - Land at Yarmouth Road, Brundall

Phil,

Thank you for your email dated 5 October.

I enclose a plan showing the dimensions of a full size 3G pitch for football use, which requires an area of 106m x 70m (7420m²). As well as the pitch itself you would need to consider the need for ancillary facilities (e.g. car parking and changing facilities).

It would be helpful if an indicative layout plan was submitted to demonstrate that the land in question could accommodate the facilities required on the proposed 1.2ha site.

There is also the issue of whether an artificial pitch with floodlighting and evening use would be acceptable in residential amenity/noise terms. Has the scheme been considered by EHOs? It would be a shame if outline consent was granted but a detailed scheme ran into residential amenity issues, or was the subject of noise complaints once the facility and adjoining housing had been built.

As the application does not relate specifically to the provision of an artificial pitch, then the conditions suggested in my earlier response would not be applicable, but Sport England remain supportive of the scheme overall, subject to the issues identified above being clarified.

Please contact me if you wish to discuss this response in more detail.

Kind Regards,

Philip Raiswell
Planning Manager

T: 020 7273 1824
M: 07769 741165
F: 020 7273 1881
E: Philip.Raiswell@sportengland.org

From: Phil Courtier [mailto:phil.courtier@broadland.gov.uk]
Sent: 05 October 2017 09:10
To: Philip Raiswell
Cc: Nigel Harriss
Subject: FW: App Ref: 20161483 - Land at Yarmouth Road, Brundall
Nigel and I were discussing this case yesterday and as a result I just want to check something with you. Your support appears to assume that the developer will deliver the artificial pitch and the two recommended conditions relate to its design and future maintenance and management. However, the applicant is only intending to give the land (1.2Ha) to the district or parish council. The developer will also pay a commuted sum for formal and informal play which is a policy requirement to meet the demand arising from the new homes.

Can you let me know whether this changes your comments in any way?

Can you also confirm that 1.2Ha is sufficient space – the previous discussions with the Parish Council had led to the request for 1.6Ha.

Many thanks

Phil

---

Phil Courtier  
Head of Planning  
Broadland District Council

Tel: 01603 430540
Fax: 01603 430591  
www.broadland.gov.uk
phil.courtier@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 following the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure.

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From: Nigel Harriss  
Sent: 05 October 2017 08:40  
To: Phil Courtier  
Subject: FW: App Ref: 20161483 - Land at Yarmouth Road, Brundall

From: Philip Raiswell [mailto:Philip.Raiswell@sportengland.org]  
Sent: 15 September 2017 16:51  
To: planning  
Subject: App Ref: 20161483 - Land at Yarmouth Road, Brundall

Sport England Ref: E/BRD/2017/46544/S

FAO Mr N Harriss

Dear Mr Harriss,

Thank you for consulting Sport England on the above application.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications.

This application falls within the scope of the above guidance as it relates to the creation of new sports facilities.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England’s planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Further information on Sport England’s planning objectives can be found here: http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/

The Proposal and Assessment against Sport England’s Objectives and the NPPF

The proposal relates to a mixed use development on the edge of this village to provide a retail unit (2500m2), 155 dwellings and associated roads, open space and vehicular access.

The submitted plan POS01A indicates public open space of 11200m2 to provide a formal sports pitch area. No detailed layout plans have been submitted, but I understand there is the potential for the scheme to provide a full-size 3G artificial pitch, which will primarily provide a facility for competitive football as well as midweek training needs (if planning consent is forthcoming for a floodlit facility).

Sport England are unclear as to whether this planning application relates to the provision of an artificial pitch on the public open space site (subject to approval of details required via a planning condition), or whether a subsequent planning application will be required for any such facility.

In strategic terms the Broadland Playing Pitch Strategy (2015) did not identify a specific need for a full-size 3G pitch in this part of the district, but there was a general need identified for additional 3G pitches to meet football needs in the area, as it is the policy of the Football Association (FA) to move towards increased use of 3G pitches for competitive football and training needs.

Using Sport England’s Facilities Planning Model (FPM) data, it calculates that there are only two full-size AGP’s in Broadland to meet demand for football, the sand-dressed facility at Beech Avenue, Taverham (which can only meet training demand) and the 3G pitch at Thorpe St Andrew (which can be used for matches and training). Taking into account availability during the peak period, supply is estimated at 1.7 pitches, whereas demand from residents of Broadland for football facilities is estimated at 2.5 pitches, a nominal shortfall of 0.8 pitch.

Existing pitches can only meet 74.6% of demand, below the national average figure of 83.8%. This unmet demand equates to 476 visits per week in the peak period, not being met, and the existing facilities are estimated to be operating at 100% capacity in the peak period (national average figure is 89.1%). These figures suggest that there is a local case for an additional 3G pitch within the Broadland area, and that any new facility will help to meet the demand that cannot currently be met.

Norfolk FA already operate other 3G facilities in the Norwich area, therefore there is the potential for a partnership approach to the management and maintenance of any facility that is approved. I have consulted Norfolk FA on the scheme, and they are generally supportive of the proposal being put forward, subject to the support of the Parish Council. Norfolk FA would be happy to work with the Parish Council to develop the programme of use for the facility, in order to best meet local needs.

Conclusion

This being the case, Sport England offers its support for this this application, as it is considered to meet Objective 3 as set out above, in that the scheme has the potential to deliver a new sporting facility that will meet existing/future needs for a 3G pitch to serve the local area.

Any planning consent should be subject to the following planning conditions being imposed:
1. No development shall commence until details of the design and layout of any proposed new artificial grass pitch have been submitted to and approved in writing by the Local Planning Authority, after consultation with Sport England. The facility shall not be constructed other than substantially in accordance with the approved details.

*Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy.*

*Informative: The applicant is advised that the design and layout of the [sports facility] should comply with the relevant industry Technical Design Guidance, including guidance published by Sport England, National Governing Bodies for Sport.*

2. Before any new artificial grass pitch is brought into use, a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. Such a scheme shall make provision for the replacement of the pitch surface at the appropriate time.

*Reason: To ensure that the new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy.*

If you wish to amend the wording of the conditions or use another mechanism in lieu of the condition(s), please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

The absence of an objection to this application in the context of the Town and Country Planning Act, does not in any way commit Sport England or any National Governing Body of Sport to support for any related funding application.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Yours sincerely,

Philip Raiswell
Planning Manager

T: 020 7273 1824
M: 07769 741165
F: 020 7273 1981
E: Philip.Raiswell@sportengland.org

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Hannah – fya

Regards

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

Tel: 01603 430529
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 following the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure.

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Nigel thank you for the opportunity to comment on this application.

As you are aware the scheme was subject of informal pre-application advice as regards the layout and form and scale of development.
The proposal as submitted accords with that pre-application advice. The initial phase has retained the sense of open space as the informal scheme - both at the North and South end of the scheme and also maintained the clear lines of site from the footpath to the South of the site looking North over the valley. This is reinforced by a comprehensive landscaping scheme for the site using native planting with some ornamental species. This generally maintains wide margins in front of the dwellings again giving a sense of space and opening vistas up through the development.
Whilst some care will need to be taken with the choice of hard landscaping particularly to the central area of paving, the layout of the scheme is acceptable in design terms, it fulfils the aim of keeping vistas open through the site, provides open shared space and routes through the site. No objection to the layout as proposed.

Looking at the detailed design of the individual house types.

House Type
- 2 bed type 1 - No comments – Query cladding material for canopy.
- 2 bed type 1 no comment – Query cladding material for bay and canopy.
- 3 bed narrow no comment – Query cladding material for walls and canopy.
- 3 bed wide plan type 1 – The window to Bedroom 1 shown centrally on plan but not on elevation maybe based on type 2). Central would be better. Given the windows to the right of the front elevation bath e/s and lounge are centred it would be better if the kitchen and bed 2 windows were centred also. – Query cladding material for walls and canopy.
- 3 bed wide type 2 - Given the windows to the right of the front elevation bath e/s and lounge are centred it would be better if the kitchen and bed 2 windows were centred also. – Query material for bay and canopy.
- 3 bed wide type integral garage – garage door appears too narrow in elevation. - Query material for canopy
- 3 bed wide type 2 integral garage – garage door appears too narrow in elevation. Query material for canopy.
- 4 bed compact type 1 – door and window to side elevation would appear better centred over each other and within elevation. - Query cladding material for wall. - Query material for canopy.
- 4 bed compact type 2 – Front elevation right side - centre living room windows below Bedroom window to gable. – Query cladding material. Query bay and canopy material.
- 4 bed L shaped type 1 – No comments – Query cladding material for wall. Query bay and canopy material.
- 4 bed L shaped type 2 - No comments – Query cladding material for wall. Query bay and canopy material.
- 4 bed L shaped type 3 – Centre bedroom 1 window over 2 living room windows below on front elevation. – Query Bay and canopy cladding.
- 1 bed flats – no comment – Query cladding material for walls and canopy.
- 2 bed corner plans - no comment – Query cladding material for walls and canopy.
- 2 bed affordable type 1 centralise single light windows to side elevation. Centralise bay to first floor front. – Query cladding material for walls. Query bay and canopy material.
- 2 bed affordable type 2 - no comment – Query cladding material for walls and canopy.
- 3 bed affordable integral garage - no comment – Query cladding material for walls and canopy.
- 3 bed affordable - no comment – Query cladding material for walls and canopy.
- Garages - no comment – Query cladding material for walls.

In summary the minor amendments above are suggested as improvements to the overall appearance of the house types.

Query re cladding - In terms of the wall cladding the proposal states timber cladding is to be used. This is preferred over fibre cement boarding and its proposed use here is welcomed and should be secured.

Query re Bays and Canopies- Further details of finishes such as the cladding to the bays and canopies will be required as well as the construction of these elements.

Subject to addressing the minor amendments listed above the detailed design of the individual units the scheme is considered acceptable. The use of consistent forms, detailing and materials give a visual coherence to the proposal which is welcomed. This approach should inform later phases.

As always happy to discuss further.

Regards

Ben.

Ben Hogg
Design Advisor
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Afternoon Phil,

Further to your email below, I asked Jon Hanner to have a look at the site and the proposed access and he has come back with the following comments:

*By the looks of it during informal pre-application discussions, in the absence of speed data, splays of 59m were suggested. However from looking at the TA (see section 6.2) the applicant has undertaken an ATC, and suggested that at present speeds are relatively low with 85%tile speeds of 30 & 31 mph respectively, hence the 43 m splay proposed.*

*The access is on the inside of a slight bend however from looking at the access drawing (attached) they have the ability to provide 43 m splay (which accords with the 85%tile speeds) and appropriate forward visibility can be achieved. Presumably, from looking at the ATC results, speeds are somewhat contained at present by the geometry of the road.*

*The junction leads into a Type 2 road which is considered suitable for this scale of development.*

I hope this reassures you that Andrew’s original assessment was ok.

Kind regards,

Liz

---

Dear [Name],

You are correct that the splay width of 59m was suggested during informal discussions, but it is important to note that an Access to the Community (ATC) study has been conducted. The ATC results indicate that the current speeds at the site are relatively low, with 85th percentile speeds of approximately 30 and 31 mph. Based on these findings, a 43m splay has been proposed.

The entrance to the site is situated on the inside of a slight bend. Upon reviewing the access drawing provided, it appears that the proposed design allows for a 43m splay, which aligns with the 85th percentile speeds and ensures adequate forward visibility. The ATC results suggest that the current speed conditions are partly influenced by the road geometry.

This concludes that the proposed entrance is suitable for the intended scale of development, as it meets the necessary safety and accessibility standards. Thank you for your consideration in this matter.

Best regards,

Liz Poole
Principal Engineer (Major & Estate Development)
Planning and Economy

---

[Contact Information]
Liz

I went to the above site a couple of times last week and the second time I took some committee members for a pre-committee site briefing. Both times I was very surprised about the proposed access arrangement serving the site. Also, although no members explicitly gave an opinion there were a few raised eyebrows when we looked at the point of access.

I think that this may be a big concern for some of our members and I would be grateful for a second opinion (I think Andrew has given advice on the access to date) because to my untrained eye the access is on the inside of a bend, visibility seemed very poor and traffic speeds didn’t seem exceptionally slow.

Sorry to add to your burdens!

Cheers

Phil

Phil Courtier
Head of Planning
Broadland District Council

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phil.courtier@broadland.gov.uk

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Hello Charles

I have attached the formal record of the Habitat Regulation Assessment that the Natural Environment Team have undertaken on behalf of Broadland DC. I believe that the conclusions contained within it are sound, and that it addresses the issues raised by Natural England in their formal consultation response.

I would, of course by happy to correct any factual errors or mistakes of a typographical nature, but if you are happy with it, I would suggest that you make reference in any committee report or delegated officers report to that fact that you are ‘adopting’ it as Broadlands’ formal HRA record of the proposal.

Kind regards

David

Dr David White MCIEEM
Senior Green Infrastructure Officer
Natural Environment Team
Norfolk County Council
david.white.etd@norfolk.gov.uk
Direct dial: 01603 222058
NCC general enquiries: 0344 800 8020

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Record of Appropriate Assessment in accordance with Regulation 61 & 62 of the Conservation of Habitats and Species Regulations 2012 (as amended) on behalf of Broadland District Council

<table>
<thead>
<tr>
<th>Application name</th>
<th>Land East of Memorial Hall, Brundall (Hybrid Application)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning application reference no.</td>
<td>20171386</td>
</tr>
<tr>
<td>Case officer (Broadland District Council)</td>
<td>Charles Judson (Nigel Harriss)</td>
</tr>
<tr>
<td>HRA author (Norfolk County Council)</td>
<td>David White, BSc. (Hons), PhD, MCIEEM, Senior Green Infrastructure Officer</td>
</tr>
<tr>
<td>Checked by (Norfolk County Council)</td>
<td>Ed Stocker, County Ecologist</td>
</tr>
<tr>
<td>Date</td>
<td>26th October 2017</td>
</tr>
</tbody>
</table>

Application name in full: Land East of Memorial Hall, Brundall; Hybrid Application - 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 (Class C2 and C3 Use); a Community/Sports Pavilion (Class D1 and D2 Use); a Country Park; Formal Outdoor Sports Provision; Access;


The following is a record of the Appropriate Assessment undertaken by the Natural Environment Team of Norfolk County Council on behalf of Broadland District Council as the Competent Authority in relation to the above proposal.

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species rely
  - The populations of qualifying species, and,
  - The distribution of qualifying species within the site.

For The Broads SAC, the Qualifying Features are:

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>H3140</td>
<td>Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.; Calcium-rich nutrient-poor lakes, lochs and pools</td>
</tr>
<tr>
<td>H3150</td>
<td>Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed</td>
</tr>
<tr>
<td>H6410</td>
<td>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinia caerulea); Purple moor-grass meadows</td>
</tr>
<tr>
<td>H7140</td>
<td>Transition mires and quaking bogs; Very wet mires often identified by an unstable &quot;quaking&quot; surface</td>
</tr>
<tr>
<td>H7210</td>
<td>Calcareous fens with Cladium mariscus and species of the Caricion davallianae; Calcium-rich fen dominated by great fen sedge (saw sedge)*</td>
</tr>
<tr>
<td>H7230</td>
<td>Alkaline fens; Calcium-rich springwater-fed fens</td>
</tr>
<tr>
<td>H91E0</td>
<td>Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae); Alder woodland on floodplains*</td>
</tr>
<tr>
<td>S1016</td>
<td>Vertigo moulinessa; Desmoulin's whorl snail</td>
</tr>
<tr>
<td>S1355</td>
<td>Lutra lutra; Otter</td>
</tr>
<tr>
<td>S1903</td>
<td>Liparis loeselii; Fen orchid</td>
</tr>
<tr>
<td>S4056</td>
<td>Anisus vorticulus; Little whorlopool ram's-horn snail</td>
</tr>
</tbody>
</table>


For the Broadland SPA, the Qualifying Features are:

<table>
<thead>
<tr>
<th>Code</th>
<th>Species</th>
</tr>
</thead>
<tbody>
<tr>
<td>A021</td>
<td>Botaurus stellaris; Great bittern (Breeding)</td>
</tr>
<tr>
<td>A037</td>
<td>Cygnus columbianus bewickii; Bewick's swan (Non-breeding)</td>
</tr>
<tr>
<td>A038</td>
<td>Cygnus cygnus; Whooper swan (Non-breeding)</td>
</tr>
<tr>
<td>Screening</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>Is the proposal directly connected with, or necessary to, the conservation management of the European Sites?</td>
</tr>
</tbody>
</table>
| 5. | What are the likely direct, indirect or secondary impacts of the proposal on the European Sites? | The HRAs for the Joint Core Strategy and the subsequent Broadland District Council DM Policies and Site Allocation DPD identified that development in Greater Norwich, both at a site level and cumulatively, has the potential to lead to an impact on the integrity of the designated features of the Natura2000 network, from increased recreational use. In addition it was identified that in some locations in close proximity to Natura2000 component units, there was the potential for individual developments to impact wetland features via watercourses.

In the current application, the proximity of the application site to the Broads SAC and the Broadland SPA (Euclidean distance of around 650m) means that there is the potential for increased recreational pressures to be an issue with an impact on site integrity.Similarly given the direct link of the watercourse to the SPA/SAC via semi-natural habitats (around 2000m downstream) and a number of designated features associated with wetland habitats, there is a potential for impacts on water quality arising from the development.

Given that an impact on site integrity cannot be screened out, an Appropriate Assessment is necessary for potential impacts from (a) increased recreational use of Natura2000 sites and (b) on water quality. |
Given the above, it is considered that it is unlikely that there will be a significant impact on designated features of the Natura2000 network from increased recreational use as a result of this development, either singularly or in combination with others in the locality. No mitigation is necessary.

Summary of reasons:
- There are very limited access opportunities to the Natura2000 sites in the area of the application;
- Natural England have previously accepted the principle that >350 dwellings new and proposed dwellings in the settlement will not have an impact on the Natura2000 network.
- The Green Space (country park) included in the proposals means there will be opportunities for residents of the proposed development to undertake their daily recreational needs and the application will allow for greater connectivity for people to access the countryside;
- Accessible green space is limited within the settlement of Brundall and residents both current and future will 'spread-out' over a wide area for their recreational needs.

(b) Hydrological and water quality issues:
The application site includes watercourses that feed directly into the European site around 2000m downstream via the Lackford Run. There is therefore the potential for development in the current application to adversely impact water quality both during construction and during occupation. Contamination, pollution or run-off carrying loose material could enter the watercourse during construction or as a result of inappropriate drainage.

Mitigation measures:
1. During construction:
   It will be necessary to put in place contamination and pollution control measures, and to minimise run-off so no soil or loose material enters the watercourse. This should be ensured via condition, either a stand-alone condition or as part of a Construction Environment Management Plan (CEMP). This should meet best practice industry standards (e.g. BS42020:2013 Biodiversity – Code of practice for planning and development).

2. During operation:
   An appropriate SUDs drainage scheme should be conditioned.

With the above mitigation secured by condition, there should be no adverse impacts on the integrity of the designated features of the Natura2000 features.
<table>
<thead>
<tr>
<th>Conclusions</th>
<th>8. Summary of AA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• The Outline Application is for the residential development of up to 170 dwellings, together with associated vehicular, cycle and pedestrian access. The Outline Planning Application seeks approval for development quantum (supported by Development Parameter Plans) and access, for the whole site.</td>
</tr>
<tr>
<td></td>
<td>• An impact on site integrity of European sites in the Broads cannot be screened out, therefore an Appropriate Assessment is necessary for potential impacts from (a) increased recreational use of Natura2000 sites and (b) on water quality/hydrology.</td>
</tr>
<tr>
<td></td>
<td>• With regards to the potential of increased recreational use, the AA determined that it is unlikely that there will be a significant impact on designated features of the Natura2000 network as a result of this development, either singularly or in combination with others in the locality. No mitigation is necessary.</td>
</tr>
<tr>
<td></td>
<td>• With regards to water quality and hydrological issues, the AA determined that mitigation will be required. During construction contamination and pollution control measures must secured by condition. This should be ensured via condition such as a Construction Environment Management Plan (CEMP). An appropriate SUDs drainage scheme should be conditioned.</td>
</tr>
</tbody>
</table>

**With the above mitigation secured by condition, there should be no adverse impacts on the integrity of the designated features of the Natura2000 features.**
"Ade, Bicled, Brundall, Loddon/Chedgrave and Wroxham are close to the Broads and development must ensure there is no detrimental impact, including no significant detrimental effect on the Broadland SPA, Broadland Ramsar and Broads SAC."

The majority of the application site (for 2018/482) is located on land allocated for recreational open space (allocation SP120) in Broadland District Council's Site Allotments Development Plan Document. This means the proposal has not been taken into account and accessed in any of the HRA produced for the JCU at Broadland District Council Local Plan documents.

On-site green space provision

We welcome the provision of on-site informal open space and have the following comments to make:

Policy EN3 of the adopted Development Management Development Plan Document (DMDPD) requires that, where appropriate, on-site informal open space should be provided at a ratio of 4 ha per 1000 new residents. Importantly, however, the supporting text of the policy highlights that simply meeting this ratio is not sufficient in itself but that on-site provision must be adequate to provide a viable alternative as part of a wider green infrastructure network. On sites where adequate provision cannot be achieved, off-site provision is necessary. The policy is therefore flexible in that, where high quality on-site provision is not possible (e.g. for small developments, contributions to off-site informal open space (e.g. as identified through the Greater Norwich Infrastructure Plan (GNIP)) will be sought.

Natural England advises that good quality on-site green infrastructure needs to be provided to help mitigate impacts from recreational disturbance by encouraging residents to walk and exercise to their dogs on-site, to help reduce disturbance to birds within designated sites. Circular walks of sufficient length, with opportunities to exercise dogs off leads safely, and with identified connections to adjacent land or built development, should be incorporated. The developer should be clear as to what is being provided as multifunctional greenspace and what is being provided specifically to mitigate for recreational disturbance impacts. A financial contribution to your authority should be made so that future work can be undertaken to monitor the effectiveness of the mitigation measures.

3. Natural England’s view on the way forward to progress the application

It is for Broadland District Council to decide whether sufficient information is contained within the current HRA, to enable them to determine whether there will be any likely significant effect on European and international sites, including whether the developer has fully considered recreational impacts due to any new housing allocation sites which have potential, either alone or in combination, to adversely affect any of the European and international sites in the vicinity. Please note that recreational and disturbance from dog walking should include both off-leash dog walking and off-lead walking in places where a lead may be required due to the nature of the environment.

Having highlighted the shortcomings of the current HRA, it is Natural England's view that Broadland District Council may be able to produce a set of likely significant effect on the European and international sites both alone and in combination with other plans or projects, if adequate mitigation measures for recreational impacts are built into the proposal that seek to avoid all potential impacts, and that these are secured through a suitable agreement. This would need to include:

- sufficient appropriate on-site green space provision and capacity;
- suitable connections being provided to link to other off-site accessible GI (where appropriate);
- the use of a suitably secured planning condition to secure the delivery of appropriate open space.

Without wishing to pre-empt Broadland District Council's decision under Regulation 61 and 62, a way to move this application forward would be to revise your HRA report to address all the points raised in this letter, and then re-submit it to the Council. (Natural England would be prepared to review this document through our discretionary advisory service (DAS) if you would like. For further details about the DAS please see here.) If the Council are satisfied with the amended report, they could then adopt it as their own HRA and so comply with the requirements of the Habitats Regulations. However, we strongly recommend that this approach is discussed with the Council first, as the competent authority under the Habitats Regulations.

4. Other Advice

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust, local geoscientific group or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at Wildlife and Countryside link.

Protected species

Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree and provides advice to planners on deciding if there is a reasonable likelihood of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site, nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

If further advice is required

If the developer requires substantive advice in addition to that provided above, Natural England advises that the applicant/developer consults Natural England directly, so that they have the opportunity to express an interest in using our discretionary advisory service (DAS), which is a chargeable service.

The first step is for the developer to fill out a simple form, so we can register their interest, and make sure they have the right advice for their case. Please visit our website (here) for more information and a downloadable request form can be found here.

For any queries relating to the specific advice in this letter only please contact Louise Oliver on 02080 254893. For any new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

Yours sincerely

Louise Oliver
Norfolk and Suffolk Team
Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00024510
Local Planning Authority: Broadland District
Site: Land East of Memorial Hall, Brundall
Proposal: Hybrid Application – 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 (Class C2 and C3 Use); 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 Plans

Planning Application: 20171386

Prepared by: Pre-Development Team
Date: 16 November 2017

If you would like to discuss any of the points in this document please contact me on 0345 606 6087 or email planningliaison@anglianwater.co.uk
Section 4 – Surface Water Disposal

4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

Section 5 – Trade Effluent

5.1 Not applicable
Nigel Harriss

From: Poole, Liz <liz.poole@norfolk.gov.uk>
Sent: 23 October 2017 13:06
To: Nigel Harriss; planning
Subject: Response To Application Number 20171386 at BRUNDALL - Land East of Memorial Hall, Brundall
Attachments: Response_20171386.pdf

Please find attached my representation in relation to the above planning application.

Regards

Andrew Willeard

See our email disclaimer click here <a href="http://www.norfolk.gov.uk/email disclaimer">http://www.norfolk.gov.uk/email disclaimer</a>
Dear Mr Harriss,

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 (Class C2 and C3 Use); Community / Sports Pavilion (Class D1 and D2 Use); Country Park; Formal Outdoor Sports Provision; Access etc. All Development, Works and Operations to be in accordance with the Development Parameters Plans. Land East of Memorial Hall, Brundall.

Further to my colleague Andrew Willeards response dated 19th October 2017 primarily regarding detailed layout concerns of Phase 1, I understand that the Transport Assessment which accompanied the application did not consider the cumulative traffic impacts of development in the Brundall/Blofield area.

The Highway Authority requires such an assessment to be undertaken and has requested this information from other applications in the area. Therefore whilst the Highway Authority has a Holding Highway Objection regarding the detailed layout considerations as per Mr Willeards letter of the 19th October, we also have a Holding Highway Objection in relation to the lack of cumulative assessment within the Transport Assessment.

The applicant should contact contact the Highway Authority to discuss the further information required.

Yours sincerely,

Liz Poole

Principal Engineer - Major and Estate Development
for Executive Director for Community and Environmental Services

www.norfolk.gov.uk
Dear Nigel Harriss

Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans
Land East of Memorial Hall, Brundall

With reference to the above application, in relation to highway matters only, I can confirm that the County Council would have no objection in principle to the proposal for 170 dwellings, etc accessed from Brundall Road as shown on drawing 161068-SK100 rev P1 contained in the transport assessment.

Additionally I can confirm there would be no objection to foot/cycle links that can also be used as an emergency access to either Meadow View or Links Avenue.

As consequence subject to appropriate conditions regarding the detailed design proposals for the layout of the site, confirmation of the emergency access and improvements / diversion of the existing public rights of way, I would have no objection to the outline proposals.
Hi Nigel

Thank you for consulting me on this proposal, my comments are as follows, having worked from drawing PLO1 'Planning Layout with trees, Phase 1':

**Phase 1:**

- For the larger area of POS, I would wish to see details of boundary treatments (particularly adjacent to the private driveway and area adjacent to plots 21-23) to prevent vehicle access and parking, together with maintenance provision, such as dropped kerbs and lockable maintenance gates/bollards. In addition, please clarify who will take on the maintenance of this area.
- There are a number of verges adjacent to the highway – please clarify whether these will be adopted as part of the highway by Norfolk County Council. If not, these are areas that are likely to be maintenance liabilities for whoever takes on the areas of 'open space' – many of them contain trees to be maintained into the future.
- There are some small areas of 'open space' that if possible should be designed out of the scheme – they are small areas adjacent to people's properties or with what appears to be not of much benefit to the development that are likely to become maintenance liabilities. These are:
  - Area in front of Plots 1 & 2; Area in front of Plots 18-19; Area to north of plot 23; Areas either side of highway adjacent to Plots 4-5 and Plot 13; Area to east of Plot 4; Area in front of Plot 6-10.
- There are small landscaping areas adjacent to the car parking spaces for some plots: 21 & 22, adj to Visitor space adjacent Plot 5 – who will be responsible for these? In addition, some of these areas contain proposed trees which are likely to cause conflict with the cars using the spaces...
- Please confirm ownership of the existing mature trees to be retained (?) to the south of the large area of POS.

I am guessing this is all there is to comment on at this stage, as the rest of the proposals have not yet been submitted in detail, and I hope my comments are useful and if anything unclear please get in touch.

Many Thanks

Tracy Ball
Countryside Officer

Norwich Fringe Project
Norman Centre
Bignold Road
Norwich
NR3 2QZ

Tel: 01603 423303
Mb: 07826 950225

Email: tracy.ball@norwichfringeproject.co.uk
Web: www.norwichfringeproject.co.uk

Please note – my working days are Tuesday and Wednesday.
Dear Mr Harriss

PLANNING APPLICATION 20171386 - LAND EAST OF THE MEMORIAL HALL, BRUNDALL

I write in respect of the above Planning Application to provide some information relating to capacity at Brundall Primary School, following discussion on the matter at our recent Board of Governors Meeting.

The Board of Governors has been conscious of a number of new housing developments both in Brundall and the wider local area, most notably within the neighbouring village of Blofield.

The School’s ‘Planned Admission Number’ (PAN) is 45, which requires us to have a number of mixed age classes. Our class structure has to be very carefully managed each year. The starting point for our structure relates to the number of children joining the school in Reception as there is a mandatory maximum class size of 30 for Reception / Year 1.

For September 2017 we have a full admission in Reception, and the resulting class structure means that our Early Years/Key Stage 1 (Reception, Year 1 and Year 2) is full. If we continue to have a full Reception intake in the next few years, Key Stage 1 will remain full.

Our Key Stage 2 (Years, 3, 4, 5 and 6) has a slightly more mixed picture, our Year 5 class is full, and there are some spaces in Year 6 (albeit new arrivals in Year 6 are rare). Our Year 3 and 4 age groups are in 3 mixed classes and as such we have limited places available across the 2 year groups in the current mixed class structure. However, the situation in Key Stage 1 noted above, means that in the next 2-3 years as the cohorts move up the school, Key Stage 2 will be full based on current intake numbers.

Our roll has been steadily rising in recent years, having gone from 223 in 2014 to 270 at the present time - a 21% increase. We are mindful that the school is not just affected by new housing in Brundall but there is also an impact from the numerous housing developments in Blofield and other nearby villages. Blofield school currently has a one form intake of 30 and is already at capacity and oversubscribed. The same is also true of our feeder High School, Thorpe St Andrew School & 6th Form which has a Year 7 PAN of 300 and publicly reported information shows it is oversubscribed for the current year.

We have seen an increasing number of place enquiries within the year. While we always do our best to accommodate such admission requests, unfortunately on a number of occasions we have had to refuse a place due to being at capacity in a particular class/year group.

We are told anecdotally that developers are highlighting the Good/Outstanding Schools in the area as part of their marketing, however, the reality is that there is either no or limited space at the schools in question.

We are already looking at ways to maximise our existing physical space to accommodate our immediate/short term needs due to our rising numbers and the nature and size of our site is such that adding more buildings to the site is not feasible. The Board of Governors is therefore very concerned that it is already going to be a challenge to accommodate additional pupils moving into the developments which have recently been completed/are currently under construction and, as such, feel that any further new developments will place our school and neighbouring schools under further unsustainable pressure, which will have a negative impact on the quality of provision we are able to deliver.

Yours sincerely

Rick Stuart-Sheppard
Headteacher
Brundall Primary School
Braydeston Avenue
Brundall
Norfolk
NR13 5JX
Dear Mr Harriss,

Planning consultation: Outline with reserved matters for phase 1 23 dwellings, and phase 2 170 dwellings and associated infrastructure and outdoor amenities etc
Location: Land East of Memorial Hall, Brundall

Thank you for your emailed consultation dated 16 August 2017 and received on the same date. Thank you for agreeing to extend the deadline.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

1. Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations'), Wildlife and Countryside Act 1981 (as amended)

Further Information Required

Internationally and nationally designated sites
It is considered that this application site has the potential to affect the interest features of European designated sites (also commonly referred to as Natura 2000 sites or N2K sites). European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations'). The application site has the potential to impact upon Broadland Special Protection Area (SPA) and The Broads Special Area of Conservation (SAC) which are European sites. These sites are listed as Broadland Ramsar site¹ and also notified at a national level as Yare Broads and Marshes Site of Special Scientific Interest (SSSI) and Cantley Marshes SSSI. SSSIs are afforded protection under the Wildlife and Countryside Act 1981 (as amended). The relevant notification features of the SSSIs broadly relate to the features associated with the N2K sites and so the following comments are applicable in both an international and national context.

In considering the interests of the European sites, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have². The Conservation Objectives for each European site explain how the

¹ Listed or proposed Wetlands of International Importance under the Ramsar Convention (Ramsar) sites are protected as a matter of Government policy. Paragraph 118 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.
² Requirements are set out within Regulations 61 and 62 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 61 and 62 are commonly referred to as the 'Habitats Regulations Assessment' process.
site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

In advising your authority on the requirements relating to Habitats Regulations Assessment (HRA), it is Natural England’s advice that the proposal is not necessary for the management of the above N2K sites. Your authority should therefore determine whether the proposal is likely to have a significant effect on any N2K site, proceeding to the Appropriate Assessment (AA) stage where significant effects cannot be ruled out. We advise that the following should be considered before likelihood of significant effects can be ruled out through the HRA process:

**Impacts of recreational disturbance**

N2K sites are susceptible to damage caused by increasing recreational pressure, particularly on the birds which they are designated for. Recreational pressures, particularly dog walking, can cause disturbance, which affects the breeding success of birds, and their abilities to feed or rest adequately throughout the year.

**Further information required**

The consultation documents provided by your authority do not include sufficient information to demonstrate that the requirements of Regulations 61 and 62 of the Habitats Regulations have been considered by your authority, i.e., the consultation does not include a Habitats Regulations Assessment. The documents produced in support of the proposal for this housing proposal do not appear to have examined whether potential recreational impacts, particularly dog walking, in combination with any other plans or proposals, could adversely affect any of the European and international sites (SAC, SPA and Ramsar) in the vicinity.

Sufficient information should be provided by the applicant for your authority, as the competent authority, to determine whether there will be any likely significant effect on European designated sites. We recommend that the applicant should address impacts upon European and Ramsar sites and provide sufficient information in a written document to inform your authority’s Habitats Regulations Assessment, which will need to be undertaken.

2. **Local Plan Documents and Policies and Habitats Regulation Assessment**

The HRA of the Greater Norwich Joint Core Strategy (JCS) highlighted the need for consideration of hydrological impacts on Natura 2000 sites\(^3\); and identified the need for green infrastructure (GI) provision to mitigate potential cumulative effects associated with recreation impacts on international sites.

The HRAs for the Broadland District Council Local Plan documents (HRA of Broadland District Council Development Management Policies Document; Norfolk County Council (NCC) August 2014; and HRA of the Site Allocation Development Plan Document, NCC August 2014) recognised the role of new and enhanced GI to mitigate potential impacts from recreation on Natura 2000 sites. The principle being that if attractive GI is available close to new homes, residents will use that for their regular day-to-day recreation, including dog-walking, rather than visiting Natura 2000 sites.

Brundall lies within the Norwich Policy Area (NPA) for the Greater Norwich JCS and is designated as a Key Service Centre under **Policy 14 – Key Service Centres**. Under this policy Brundall is allocated approximately 50 dwellings with additional development being considered, if necessary, to help deliver the ‘smaller sites as identified in NPA’ allowance in the JCS. Clearly the proposal (20171386) alone would exceed this figure considerably and could lead to increased recreational impacts, both alone, or in combination with other housing plans or proposals. Under 6.47 of Policy 14 it states:

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\(^3\) These are Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.
"Acle, Blofield, Brundall, Loddon/Chedgrave and Wroxham are close to the Broads and development must ensure there is no detrimental impact, including no significant detrimental effect on the Broadland SPA, Broadland Ramsar and Broads SAC."

The majority of the application site (for 20161483) is located on land allocated for recreational open space (allocation BRU2) in Broadland District Council’s Site Allocations Development Plan Document. This means that the proposal has not been taken into account and assessed in any of the HRAs produced for the JCS or Broadland District Council Local Plan documents.

On-site green space provision

We welcome the provision of on-site informal open space and have the following comments to make:

Policy EN3 of the adopted Development Management Development Plan Document (DMDPD). requires that, where appropriate, on-site informal open space should be provided at a ratio of 4 ha per 1000 new residents. Importantly, however, the supporting text of the policy highlights that simply meeting this ratio is not sufficient in itself but that on-site provision must "be adequate to provide a viable alternative as part of a wider green infrastructure network. On sites where adequate provision cannot be achieved, off-site provision is necessary". The policy is therefore flexible in that, where high quality on-site provision is not possible (e.g. for small developments), contributions to off-site informal open space (e.g. as identified through the Greater Norwich Infrastructure Plan (GNIP)) will be sought.

Natural England advises that good quality on-site green infrastructure needs to be provided to help mitigate impacts from recreational disturbance by encouraging residents to walk and to exercise their dogs on-site, to help reduce disturbance to birds within designated sites. Circular walks of sufficient length, with opportunities to exercise dogs off leads safely, and with identified connections to adjacent land or built development, should be incorporated. The developer should be clear what is being provided as multifunctional greenspace and what is being provided specifically to mitigate for recreational disturbance impacts. A financial contribution to your authority should be made so that future work can be undertaken to monitor the effectiveness of the mitigation measures.

3. Natural England’s view on the way forward to progress the application

It is for Broadland District Council to decide whether sufficient information is contained within the current HRA, to enable them to determine whether there will be any likely significant effect on European designated sites, including whether the developer has fully considered recreational impacts due to any new housing allocation sites which have potential, either alone or in combination, to adversely affect any of the European and international sites in the vicinity. Please note that recreational impacts arising from dog walking should include both consideration of people on foot walking their dogs locally, and those driving to a designated site to exercise their dogs.

Having highlighted the shortcomings of the current HRA, it is Natural England’s view that Broadland District Council may be able to screen out a likely significant effect to the European and international sites both alone and in combination with other plans or projects, if adequate mitigation measures for recreational impacts are built into the proposal that seek to avoid all potential impacts, and that these are secured through a suitable condition. This would need to include:

- sufficient appropriate on-site green space provision and capacity;
- suitable connections being created to link to other off-site accessible G1 (where appropriate); and
- the use of a suitably worded planning condition to secure the delivery of appropriate open space.

Without wishing to pre-empt Broadland District Council’s decision under Regulation 61 and 62, a way to move this application forward, would be to revise your HRA report to address all the points raised in this letter, and then re-submit it to the Council. (Natural England would be prepared to review this document through our discretionary advisory service (DAS) if you would like. For further details about the DAS please see here). If the Council are satisfied with the amended report, they could then adopt it as their

Page 3 of 4
own HRA and so comply with the requirements of the Habitats Regulations. However, we strongly recommend that this approach is discussed with the Council first, as the competent authority under the Habitats Regulations.

4. Other Advice

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at Wildlife and Countryside link.

**Protected species**

Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

**If further advice is required**

If the developer requires substantive advice in addition to that provided above, Natural England advises that the applicant/developer consults Natural England directly, so that they have the opportunity to express an interest in using our discretionary advisory service (DAS), which is a chargeable service.

The first step is for the developer to fill out a simple form, so we can register their interest, and make sure they have the right adviser for their case. Please visit our website [here](#) for more information and a downloadable request form can be found here.

For any queries relating to the specific advice in this letter only please contact Louise Oliver on 02080 264893. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Louise Oliver
Norfolk and Suffolk Team
From: Kate Knights
Sent: 29 September 2017 13:33
To: Nigel Harriss
Subject: 20171386 Land to the east of Memorial Hall, Brundall

Dear Nigel,

Thanks for consulting me on this application.

It is clear that the view from the end of Links Avenue towards Blofield Church is important and is recognised as such in Policy 3 of the Brundall Neighbourhood Plan. The view contributes to the sense of place, the relationship between the two neighbouring villages and the wider setting of the grade I listed Church of St Andrew and St Peter, Blofield.

Due to the topography of the site, which slopes down to the north, the best vista is achieved from the end of Links Avenue and the field boundary immediately to the east of the Memorial Hall. It is recognised that the proposed scheme does take into account the view but it is hard to ascertain exactly how much encroachment on it there will be. In order to provide clarity of the impact I would like to see more information provided – ideally a photomontage or annotated photo showing the position, extent and height of the proposed housing in relation to the view (Site Context photograph 2: View east from Brundall Memorial Hall towards Blofield from the Landscape and Visual Impact Assessment could be used).

Boundary treatments to the external edge of the developed area and the way in which the transition between housing and public open space is dealt with will also be important in terms of their impact on this view and the setting of the village. It will need to be ensured that the housing addresses it positively and in an appropriate manner.

I’d be happy to discuss this further.

Regards,

Kate

Kate Knights
Historic Environment Officer
Broadland District Council
Tel: 01603 430507
Please note I work Tuesday / Wednesday / Thursday / Friday 9am-3pm

Please be aware that from 1 April 2017, Broadland District Council will charge for applications to approve details that are the approval of planning permission.

The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequent
Planning Application 20171386 Land East of Brundall Memorial Hall

Brundall Parish Council voted to Object to this application on the following grounds:

1) It is in conflict with Brundall's Neighbourhood Plan Policy 3 Important Views which seeks to protect and enhance the remaining views across open landscapes to the north and east of Brundall. (refer fig 4.). "The Plan seeks to protect and enhance the views to the north east from the Memorial Hall and to the south from St Michael's Church". The Plan clearly shows the splay which points in the direction of the proposed housing. The 11m proposed housing in particular will impede this view.

2) The proposed residential development comes within the area allocated for recreational use under site allocations DPD policy BRU3. The housing encroaches into this site allocation to an extent that is not acceptable and poses a conflict. It is also in conflict with Brundall's Neighbourhood Plan Policy 4 for enhanced recreation provision adopted in May 2016. The most important issue is that despite our efforts to engage with QL they have failed to recognise the need for the site allocation boundary to be adhered to and it appears they are only offering 2/3 of the recreational site allocation to which we are entitled in the Local Plan. Please see plan attached whereby it is clear that the proposed housing is encroaching too far into the recreational allocated as adopted in the Site Allocations DPD in May 2016. This encroachment is unacceptable and breaches the Neighbourhood Plan policy and policy BRU3 to an extent which the Parish Council is unable to ignore given the various requests made to QL since they have been in consultations with the Council.

The Parish will require at least those terms set out in Section 6.15 (Recreational Open Space) in the Planning Statement issued July 2017. During a meeting dated 19th September, the agents for the landowner indicated that only the gift of land would be offered and that things had "moved on from the Planning Statement". It is of concern to the Parish Council that the developer may only adhere only to the CIL obligations along with the gift of the proposed land. Therefore the Council asks that the Section 106 officer ensures that a suitable agreement contains the layout out and equipping plus provision of a maintenance sum to achieve some or all of the the recreational facilities the Council is seeking. These are a cricket pitch, skate park, informal muga, car parking and pavilion given the scale of the development. (As detailed in the illustrative plan B3 Appendix 7 which includes the Meadow View Emergency Access and the Parish plans).

3) The Proposed housing is outside the defined settlement limit for Brundall and is therefore contrary to policy GC2 of the Development Management DPD.

4) The Council cannot overlook the views of residents with the existence of a petition against the proposals presented to Broadland Council on Monday 18th September with 2500 signatures. Also with 235 letters of objection as oppose to 7 letters of support as of yesterday this demonstrates the depth of feeling against these development proposals.

5) The Council has concerns that, although Highways England has lodged no objections, our local knowledge of the area and traffic flows indicate that the access point is in an area of concern being close to a single way pinch point and also being
Planning Application 2017/386 Land East of Brundall Memorial Hall

Brundall Parish Council voted to **Object** to this application on the following grounds:

1) It is in conflict with Brundall's Neighbourhood Plan Policy 3 Important Views which seeks to protect and enhance the remaining views across open landscapes to the north and east of Brundall. (refer fig 4.), "The Plan seeks to protect and enhance the views to the north east from the Memorial Hall and to the south from St Michael's Church". The Plan clearly shows the splay which points in the direction of the proposed housing. The 11m proposed housing in particular will impede this view.

2) The proposed residential development comes within the area allocated for recreational use under site allocations DPD policy BRU3. The housing encroaches into this site allocation to an extent that is not acceptable and poses a conflict. It is also in conflict with Brundall's Neighbourhood Plan Policy 4 for enhanced recreation provision adopted in May 2016. The most important issue is that during our efforts to engage with QL they have failed to recognise the need for the site allocation boundary to be adhered to and it appears they are only offering 2/3 of the recreational site allocation to which we are entitled in the Local Plan. Please see plan attached whereby it is clear that the proposed housing is encroaching too far into the recreational allocated as adopted in the Site Allocations DPD in May 2016. This encroachment is unacceptable and breaches the Neighbourhood Plan policy and policy BRU3 to an extent which the Parish Council is unable to ignore given the various requests made to QL since they have been in consultations with the Council.

The Parish will require at least those terms set out in Section 6.15 (Recreational Open Space) in the Planning Statement issued July 2017. During a meeting dated 19th September, the agents for the landowner indicated that only the gift of land would be offered and that things had "moved on from the Planning Statement". It is of concern to the Parish Council that the developer may only adhere only to the CIL obligations along with the gift of the proposed land. Therefore the Council asks that the Section 106 officer ensures that a suitable agreement contains the layout out and equipping plus provision of a maintenance sum to achieve some or all of the recreational facilities the Council is seeking. These are a cricket pitch, skate park, informal muga, car parking and pavillion given the scale of the development. (As detailed in the illustrative plan B3 Appendix 7 which includes the Meadow View Emergency Access and the Parish plans).

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5) The Council has concerns that, although Highways England has lodged no objections, our local knowledge of the area and traffic flows indicate that the access point is in an area of concern being close to a single way pinch point and also being
in the vicinity of the Witton Run which flows into Cremers Meadow. We have concerns over the strength of the Bay Bridge to withstand the construction traffic and the extra traffic generated by the housing. With two roads (Highfield and Blofield feeding onto Brundall Road, this stretch is already a highly used vehicular area and a bus route.

Best Wishes
Sharon Smyth
Parish Clerk
Brundall Parish Council
Tel. 07809 144342
www.brundallpc.norfolkparishes.gov.uk
email: brundallparishcouncil@hotmail.co.uk
From: John Hiskett <johnh@norfolkwildlifetrust.org.uk>
Sent: 21 September 2017 11:44
To: planning; Planning Administration
Subject: further comments 20171386
Attachments: 17-1386 further comments.docx; 2277.docx

Please find further comments on Brundall housing proposal (20171386). This is in relation to a County Wildlife Site that wasn’t picked up in the application. The citation for the CWS is attached for information, although it will also be held by Broadland Council.

Kind regards

John Hiskett

John Hiskett
Senior Conservation Officer
Office: 01603 625540
Fax: 01603 598300
Web: www.norfolkwildlifetrust.org.uk

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Think green – please don’t print this email unless you really need to!
County Wildlife Site  
(Ref No: 2277)  

Site Name: Cremer’s Meadow  
Parish: Brundall  
Grid reference: TG 332088  
Area: 1.1 ha  
District: Broadland  

Site Description:  

Cremer’s Meadow is listed for its species-rich, low-lying wet meadow following a wide stream, known locally as the Lackford Run, plus a large, eutrophic pond and an area of dry grassland. Cremer’s Meadow is managed by a local committee as a parish nature reserve, the meadow was formerly grazed, but unmanaged at time of survey.  

To the north, a small area of semi-improved grassland includes Yorkshire fog Holcus lanata and false oat grass Arrhenatherum elatius, creeping cinquefoil Potentilla reptans, common mouse ear Cerastium fontanum, common vetch Vicia sativa, ox-eye daisy Leucanthemum vulgare and spear thistle Cirsium vulgare. Frequent species include perforate St John’s wort Hypericum perforatum and creeping buttercup Ranunculus repens.  

The ground drops sharply into the low-lying meadow in the east, with the stream forming the north and east boundaries; it is fast flowing throughout, with a stony base and alder occurring rarely on the banks. The north of the wet meadow is tall and rank, dominated by nettle Urtica dioica with occasional hogweed Heracleum sphondylium, lesser burdock Arctium minus, creeping buttercup, great willow herb Epilobium hirsutum, meadowsweet Filipendula ulmaria and broad leaved dock Rumex obtusifolius. Where the sward had been cut, water mint Mentha aquatica was frequent with occasional redshank Persicaria maculosa, Yorkshire fog and water forget-me-not Myosotis scorpioides. To the south and east, the meadow becomes more species-rich, with areas of impeded drainage supporting king cup Caltha palustris, floating sweet grass Glycera fluitans, silverweed Potentilla anserina, gipsywort Lycopus europaeus, square-stalked willow herb and purple loosestrife Lythrum salicaria.  

Herbs associated with the wet meadow include marsh thistle, cuckoo flower Cardamine pratensis, hoary willow herb Epilobium parviflorum and marsh stitchwort Stellaria palustris. Perforate St John’s wort is rare, whilst greater bird’s foot trefoil Lotus pendunculatus and hemp agrimony Eupatorium cannabinum are locally abundant. Other species found here include meadow buttercup Ranunculus acris, lesser spearwort Ranunculus flammula, common mouse ear and lesser water parsnip Berula erecta, plus marsh bedstraw Galium palustre and a notable population of southern marsh orchid Dactylorhiza praetemissae. Ragged robin Lychnis flos-cuculi is occasional across the meadow, with greater bird’s foot trefoil and purple loosestrife abundant in patches. Bog stitchwort Stellaria alpina is frequent, but often hidden in the taller vegetation. Drier areas support sweet vernal grass Anthoxanthum odoratum and hairy sedge Carex hirta is locally abundant; common sedge Carex nigra and brown sedge Carex disticha are also occasional across the meadow.  

In the south-east corner, goat willow Salix caprea is spreading and hybrid poplars Populus × canescens grow on the southern boundaries. A small bank of drier soils is dominated by greater willow herb, with occasional ox-eye daisy, nettle and foxglove Digitalis purpurea, plus abundant creeping thistle Cirsium arvense. Common daisy Bellis perennis, white campion Silene alba and green alkanet Pentaglottis sempervirens are all occasional in this part of the site.  

A pipe from the stream fills the northern end of the pond and here the pond appears to be relatively deep, with steep banks dominated by trees, including hybrid poplars, elder Sambucus nigra, buddleia Buddleia davidii, cypress Cupressus spp and downy birch Betula pubescens.  

Survey date: 06/2015  
Year notified 2018
Hypericum androsaemum is occasional in the ground flora, with abundant bramble Rubus fruticosus agg., nettle, burdock, foxglove and occasional greater pond sedge Carex riparia is occasional. Japanese knotweed Fallopia japonica is also present on the northern side of the pond, spreading to the east. To the south, the pond is shaded, long and narrow, possibly being an enlarged ditch, with a small outflow into the ditch that forms the southern boundary. Most of the banks have bare soil under trees, including buddleia, goat willow, grey willow Salix cinerea, elder and dogwood Cornus sanguinea. A few of the older, mature willows are old pollards. The base of the pond is muddy, and only a few marginal plants of gipsywort and water mint were observed and these were rare.
18th September 2017

Outline application for up to 170 dwellings, country park etc: 20171386 – further comments

Norfolk Wildlife Trust wishes to make further comments regarding this development.

This is because we have realised that there is a County Wildlife Site (Cremers Meadow, CWS 2277) within close proximity to the proposal, which was not picked up by the ecological consultants working for the applicant. This is because their request for information to NBIS in June 2106 was made just before the 2016 CWS update was sent out, which included details of the new CWS. Unfortunately because of this, we also failed to pick this up in our original comments.

Cremers Meadow is being developed by the local community as a wildlife area, accessible to the public. As such we are concerned that despite provision of green space on the application site, which we supported in our previous response, new residents with dogs will also use Cremers Meadow. This is a particular risk as an entrance to the northern end of Cremers Meadow lies immediately across the road from the eastern end of the development at a location where traffic will enter the new development. We appreciate that Cremers Meadow is being restored as a publicly accessible site but nevertheless damage will occur if public usage reaches a higher level than envisaged. For instance, parts of Cremers Meadow CWS are wet and an increase in visitors will cause damage to paths and to sensitive wetland habitats.

As a result if the application is approved, mitigation measures associated with the development should include measures to minimise impacts on Cremers Meadow. In our view, an element of funding for ongoing management of green space should be attributed to Cremers Meadow. These mitigation measures should be agreed with the parish council, who own Cremers Meadow.

I have attached a copy of the CWS citation for Cremers Meadow, for information.

John Hiskett CEnv MCIEEM
Senior Conservation Officer
From: Chris Small [mailto:chrissmall1957@gmail.com]
Sent: 10 September 2017 15:10
To: Nigel Harriss; planning; james.robinson@rspb.org.uk; info@bto.org; enquiries@bats.org.uk; conservation@british-dragonflies.org.uk; francis.farrow@btinternet.com; john@aurum-ecology.co.uk; djnorfolkrec@btinternet.com; pamtaylor@british-dragonflies.org.uk; recorder@norfolkbutterflies.co.uk; carl@wildlifetoursandeducation.co.uk; Norfolk Bat Survey; david.white@norfolk.gov.uk
Cc: Chris Small; nicola.millbank; Carey - EDU Cake; N Finch; Brundall Parish; keith.simpson.mp@parliament.uk
Subject: Broadland District Council: Planning Application 20171386: Land east of the Memorial Hall, Brundall

Dear Mr Harriss

Please find attached a summary of my concerns regarding the various ecological assessments carried out by Hankinson Duckett Associates for Quantum Group regarding this planning application. I am especially concerned about what I see as deficiencies in the Bat Survey and the overall Ecological Appraisal which, in my view, significantly minimise the likely environmental impact of this planning application, especially its first phase. Additionally the site visits by staff of Hankinson Duckett Associates were all made between May and September 2016 which, in my view further diminishes the validity of the overall assessments as it fails to provide a year round view of the wildlife and ecology of the site

I would request that before making a recommendation to its Planning Committee the officers of Broadland District Council commission an independent ecological appraisal of the site in question especially in relation to its use by up to eleven different species of bat.

Thank you for your time and consideration

Chris Small
Wildlife Tours and Education

P.S. I have attached a summary of my own concerns which are included in the horizontal scanning attachment.
This response is in relation to the five ecological appraisals prepared for Quantum Group by Hankinson Duckett Associates especially the Bat Survey and overall Ecological Appraisal.

My name is Chris Small. Hankinson Duckett Associates have cited data collected by me in section 3.1.1 of the ‘Desk Study’ on page 7 of the ‘Bat Survey Report’. Since 2013, I have collected data annually using a programmable electronic bat detector supplied by the Norfolk Bat Survey and analysed by them. In total I have surveyed for 17 nights, mainly in May but also August and September. All surveying took place in the parcel of land at the eastern end of the site which I understand would form the location of the first phase of the proposed development. I have recorded at least eleven species of bat on site, ten of these are named by Hankinson Duckett Associates on page 7 and the eleventh is either Whiskered or Brandt’s bat; Myotis species which are difficult to separate using aural bat detectors. According to the Norfolk Bird and Mammal Report for 2015 (the latest published version); excluding vagrants these are all the bat species recorded in Norfolk. All were recorded on the site in May 2017. This means that this field is the single most important site in Norfolk for bats in contrast to the statements made by Hankinson Duckett Associates on page 16, section 4.2.3 ‘as a whole the site is therefore considered to be of no more than moderate local interest for foraging bats’.

All bat species are protected by European and British legislation and four of those recorded on the site are included as Species of Principle Importance identified under Section 41 of the 2006 Natural Environment and Rural Communities Act and as UK Biodiversity Action Plan priority species for Norfolk.

The locations in which I have deployed the automated detector have been added to the plan provided by Hankinson Duckett Associates in Appendix B of their report as 1 and 2. Both are towards the southern end of the two well-established hedgerows running roughly north-south that form the boundary of the smaller field at the east end of the site. It could be reasonably assumed that all the hedgerows around this field are as well used by bat species. Hankinson Duckett Associates on page 16, section 4.2.2 imply that it is the Run Dike corridor forming the northern are of the site’ that is most important for bats. I would suggest that this should be extended to include those mature, established hedgerows at the eastern end of the site.

I have included details of my survey findings which record the number of bat passes, as opposed to number of bats. On average there were 120 bat passes a night with a maximum of 397 passes on 29th May 2017. Usage of the site by bats appears to have increased over the five year period I have been surveying both in terms of number of species and number of passes.

Hankinson Duckett Associates Ecological Appraisal is rather quiet on the subject of birds using the site and entirely silent in relation to dragonflies, damselflies and butterflies. I have recorded the presence of species belonging to these four orders since moving to Brundall in February 2006.

**Birds:** Buzzard (Buteo buteo), Skylark (Alauda arvensis), Cetti’s Warbler (Cettia cetti), Lesser Whitethroat (Sylvia curruca), Linnet (Linaria cannabina) and
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From: Albone, James <james.albone@norfolk.gov.uk>
Sent: 12 September 2017 14:42
To: Nigel Harriss; Planning Administration
Subject: 20171386 Land East of Memorial Hall, Brundall

Our Ref: CNF47185_1

Dear Mr Harriss,

20171386 Land East of Memorial Hall, Brundall

The proposed development site comprises a large area of relatively unknown potential to contain heritage assets with archaeological interest. Although some metal detecting, itself of unknown extent, has been carried out at the site and artefacts of post-medieval date recorded, the area has not been subject to any systematic archaeological fieldwork. However, inspection of online aerial imagery reveals the presence of previously unrecorded cropmarks of possible archaeological origin, including a rectangular enclosure and a ring ditch. Consequently there is potential that previously unrecorded heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance would be affected by the proposed development.

A heritage statement has not been submitted with the planning application in accordance with National Planning Policy Framework para. 128. In this instance an archaeological desk-based assessment alone is unlikely to provide any further information about the presence, form, surviving condition and significance of any heritage assets at the proposed development site. We therefore request that the results of an archaeological evaluation are submitted prior to the determination of the application in accordance with NPPF para. 128. In this case the evaluation should commence with a geophysical survey a brief for which can be obtained from Norfolk Historic Environment Service.

If you have any questions or would like to discuss our recommendations please do not hesitate to contact me.

Yours sincerely
James Albone

Dr James Albone MCIfA
Planning Archaeologist

Historic Environment Service
Environment and Planning
Community and Environmental Services
Norfolk County Council
Union House
Gressenhall, Dereham
Norfolk NR20 4DR

Direct dial: 01362 869279
Mob: 07769 887053
Email: james.albone@norfolk.gov.uk

We now have a general mailbox for the Historic Environment Planning Team. Please send all new site/application consultations, existing casework enquires where you are unclear who the HES case officer is, and reports for review to hep@norfolk.gov.uk
Please find further comments on Brundall housing proposal (20171386). This is in relation to a County Wildlife Site that wasn’t picked up in the application. The citation for the CWS is attached for information, although it will also be held by Broadland Council.

Kind regards

John Hiskett
County Wildlife Site
(Ref No: 2277)

Site Name: Cremer’s Meadow
Parish: Brundall

Grid reference: TG 332088
Area: 1.1 ha

District: Broadland

Site Description:

Cremer’s Meadow is listed for its species-rich, low-lying wet meadow following a wide stream, known locally as the Lackford Run, plus a large, eutrophic pond and an area of dry grassland. Cremer’s Meadow is managed by a local committee as a parish nature reserve, the meadow was formerly grazed, but unmanaged at time of survey.

To the north, a small area of semi-improved grassland includes Yorkshire fog Holcus lanata and false oat grass Arrhenatherum elatius, creeping cinquefoil Potentilla reptans, common mouse ear Cerastium fontanum, common vetch Vicia sativa, ox-eye daisy Leucanthemum vulgare and spear thistle Cirsium vulgare. Frequent species include perforate St John’s wort Hypericum perforatum and creeping buttercup Ranunculus repens.

The ground drops sharply into the low-lying meadow in the east, with the stream forming the north and east boundaries; it is fast flowing throughout, with a stony base and alder occurring rarely on the banks. The north of the wet meadow is tall and rank, dominated by nettle Urtica dioica with occasional hogweed Heracleum sphondylium, lesser burdock Arctium minus, creeping buttercup, great willow herb Epilobium hirsutum, meadowsweet Filipendula ulmaria and broad leaved dock Rumex obtusifolius. Where the stream had been cut, water mint Mentha aquatica was frequent with occasional redshank Persicaria maculosa, Yorkshire fog and water forget-me-not Myosotis scorpioides. To the south and east, the meadow becomes more species-rich, with areas of impeded drainage supporting king cup Caltha palustris, floating sweet grass Glyceria fluitans, silverweed Potentilla anserine, gipsywort Lycopus europaeus, square-stalked willow herb and purple loosestrife Lythrum salicaria.

Herbs associated with the wet meadow include marsh thistle, cuckoo flower Cardamine pratensis, hoary willow herb Epilobium parviflorum and marsh stitchwort Stellaria palustris. Perforate St John’s wort is rare, whilst greater bird’s foot trefoil Lotus pendunculatus and hemp agrimony Eupatorium cannabinum are locally abundant. Other species found here include meadow buttercup Ranunculus acris, lesser spearwort Ranunculus flammula, common mouse ear and lesser water parsnip Berula erecta, plus marsh bedstraw Galium palustre and a notable population of southern marsh orchid Dactylorhiza praetemissa. Ragged robin Lychnis flos-cuculi is occasional across the meadow, with greater bird’s foot trefoil and purple loosestrife abundant in patches. Bog stitchwort Stellaria alpine is frequent; but often hidden in the taller vegetation. Drier areas support sweet vernal grass Anthoxantum odoratum and hairy sedge Carex hirta is locally abundant; common sedge Carex nigra and brown sedge Carex disticha are also occasional across the meadow.

In the south-east corner, goat willow Salix caprea is spreading and hybrid poplars Populus × canescens grow on the southern boundaries. A small bank of drier soils is dominated by greater willow herb, with occasional ox-eye daisy, nettle and foxglove Digitalis purpurea, plus abundant creeping thistle Cirsium arvense. Common daisy Bellis perennis, white campion Silene alba and green alkanet Pentaglottis sempervirens are all occasional in this part of the site.

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Year notified 2016
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Cremera’s Meadow is being developed by the local community as a wildlife area, accessible to the public. As such we are concerned that despite provision of green space on the application site, which we supported in our previous response, new residents with dogs will also use Cremera’s Meadow. This is a particular risk as an entrance to the northern end of Cremera’s Meadow lies immediately across the road from the eastern end of the development at a location where traffic will enter the new development. We appreciate that Cremera’s Meadow is being restored as a publicly accessible site but nevertheless damage will occur if public usage reaches a higher level than envisaged. For instance, parts of Cremera’s Meadow CWS are wet and an increase in visitors will cause damage to paths and to sensitive wetland habitats.

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John Hiskett CEnv MCIEEM
Senior Conservation Officer
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Birds: Buzzard (Buteo buteo), Skylark (Alauda arvensis), Cetti's Warbler (Cettia cetti), Lesser Whitethroat (Sylvia curruca), Linnet (Linaria cannabina) and
Yellowhammer (Emberiza citrinella) all breed on the site. With the exception of Cetti’s Warbler which is present in the Run Dike corridor the remaining species are dependent on the open agriculture land (Skylark) or established hedgerows for breeding sites. Buzzards breeding in 2017 in Tree T1 (in Appendix A of Hankinson Duckett Associates ‘Bat Survey Report’).

Since 2002 Yellowhammer has been a red-list severely declining species in the UK in relation to breeding and wintering populations with both contracting numbers and range. Changes to agricultural practices are thought to be responsible for reduced breeding densities.

Since at least 1996 Skylark has been a red-list severely declining species in the UK in relation to breeding and wintering populations with both contracting numbers and range. Skylark has declined by over 90% in the UK in the last thirty years. This massive decline is mainly due to changes in farming practice which is being addressed through the payment of subsidies to farmers who change practice under Natural England’s Environmental Stewardship Scheme. The RSPB maintains a research farm in Cambridgeshire which focuses on studying the breeding needs of Skylarks.

Since at least 1996 Linnet has been a red-list severely declining species in the UK in relation to breeding and wintering populations with both contracting numbers and range. Linnet is listed as a UK Biodiversity Action Plan priority species and protected in the UK by the Wildlife and Countryside Act, 1981. The reason populations are declining is attributed to increasing use of herbicides, **aggressive scrub removal and excessive hedge trimming**. Populations fell by 62% from 1980 to 2009.

Cetti’s Warbler was first recorded in the UK in 1961.

**Odonata:** In 2017 I recorded Scarce Chaser (Libellula fulva), Norfolk Hawker (Aeshna isocoleis) and Willow Emerald (Chalcolestes viridis) on the site. Scarce Chaser is considered a species of special concern in Great Britain due to loss of its specific ideal habitat. Norfolk Hawker is a rare and local species in Britain restricted to the Norfolk and Suffolk Broads and protected against commercial exploitation under Schedule 5 of the Wildlife and Countryside Act 1981. Willow Emerald is a very recent colonist to the UK first recorded in Norfolk in 2009.

**Butterflies:** Purple Hairstreak (Neozephyrus quercus) is recorded in at least some of the Oak trees present on the site.

**Mammals:** I have recorded Harvest Mouse (Micromys minutus) breeding on site in the field margins with sightings of their distinctive nests and young. Conservation efforts have taken place in Britain since 2001.
<table>
<thead>
<tr>
<th>Year</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
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<tr>
<td>Leisler's or Noctule</td>
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</tr>
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<td>Bat species</td>
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<td>81</td>
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</tbody>
</table>
From: Albone, James <james.albone@norfolk.gov.uk>
Sent: 12 September 2017 14:42
To: Nigel Harriss; Planning Administration
Subject: 20171386 Land East of Memorial Hall, Brundall

Our Ref: CNF47185_1

Dear Mr Harriss,

20171386 Land East of Memorial Hall, Brundall

The proposed development site comprises a large area of relatively unknown potential to contain heritage assets with archaeological interest. Although some metal detecting, itself of unknown extent, has been carried out at the site and artefacts of post-medieval date recorded, the area has not been subject to any systematic archaeological fieldwork. However, inspection of online aerial imagery reveals the presence of previously unrecorded cropmarks of possible archaeological origin, including a rectangular enclosure and a ring ditch. Consequently there is potential that previously unrecorded heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance would be affected by the proposed development.

A heritage statement has not been submitted with the planning application in accordance with National Planning Policy Framework para. 128. In this instance an archaeological desk-based assessment alone is unlikely to provide any further information about the presence, form, surviving condition and significance of any heritage assets at the proposed development site. We therefore request that the results of an archaeological evaluation are submitted prior to the determination of the application in accordance with NPPF para. 128. In this case the evaluation should commence with a geophysical survey a brief for which can be obtained from Norfolk Historic Environment Service.

If you have any questions or would like to discuss our recommendations please do not hesitate to contact me.

Yours sincerely
James Albone

Dr James Albone MCIfA
Planning Archaeologist

Historic Environment Service
Environment and Planning
Community and Environmental Services
Norfolk County Council
Union House
Gressenhall, Dereham
Norfolk NR20 4DR

Direct dial: 01362 869279
Mob: 07769 887053
Email: james.albone@norfolk.gov.uk

We now have a general mailbox for the Historic Environment Planning Team. Please send all new site/application consultations, existing casework enquires where you are unclear who the HES case officer is, and reports for review to hep@norfolk.gov.uk
Dear Nigel

Please find attached the Broads Authority's Consultation Response on the above planning application.

Kind regards Alison

Alison Cornish
Planning Officer
DD 01603 756051

Broads Authority, Yare House, 62-64 Thorpe Road. Norwich NR1 1RY
01603 610734
www.broads-authority.gov.uk

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The Planning Department  
Broadland District Council  
Thorpe Lodge  
1 Yarmouth Road  
Norwich  
NR7 0DU  

Ms Alison Comish  
Planning Officer  
01603 756051  
alison.comish@broads-authority.gov.uk  

11 September 2017  
BA/2017/0301/NEIGHB  
20171386  

Dear Planning Department  

Application No:  BA/2017/0301/NEIGHB  
Proposal:  Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans  
Address:  Land East Of Memorial Hall, Brundall  
Applicant:  Quantum Land (Brundall) Ltd  

Thank you for consulting the Broads Authority on the above planning application.  

The Broads Authority does not wish to raise an objection to this application but would wish the following comments to be taken into consideration in the determination of this application.  

Design  
The site will not be visible from the Broads Authority's Executive Area and therefore in terms of design there would be no visual impact.  

In terms of general comments about the design of the scheme it is acknowledged that the overall layout and other matters have been reserved although full details have been submitted for determination for Phase 1.  
The layout for Phase 1 does follow the principle established for the development of the site, which is for a series of routes running North South to allow visual penetration through the site from the settlement fringe of Brundall and adjacent public footpath across the site and also back from the North side across the valley to Brundall.  
The layout for Phase 1 is therefore acceptable in design terms and although the remainder of the site remains a reserved matter in terms of layout the establishment of the principle discussed sets a welcome precedent for later Phases.
In terms of the detailed design the approach is broadly contemporary in style with a more traditional form incorporating pitched roofs. The layout has been considered to address the changing levels on the site and the provision of an area of open space to the middle of the layout gives a visual break and space in the centre of the scheme. In addition to the North South access this also results in the dwellings having a variation in orientation and helps prevent any terracing effect running up the valley side. The provision of a landscape buffer to the South also helps visually to reduce the density.

**Landscape**

The site is located to the north of the boundary of the Broads Authority Landscape Character Area (LCA) Area 12 Kirby, Postwok to Rockland, Strumpshaw, and directly north of Broadland's LCA Reedham to Thorpe Marshes Fringe, and is located within the Blofield LCA. Run Dike is identified as an area of drained peat or clay/peat mix.

The site area is elevated above the Broads Authority's area, with land levels rising to the north of the river towards The Street (within the existing residential development) before falling towards Run Dyke.

The proposal represents a considerable extension to the existing residential settlement within Brundall, with the potential to impact the river valley.

An LVIA has been prepared as part of the application and identifies that there are truncated/no views beyond The Street, due to extensive vegetation and woodland tree cover around the River in this location, and the topography. The Broads Authority would agree with this assessment. Landscape cover is lacking around the Brundall Marina where the river runs close to the railway line, but this does not result in clear views into Brundall.

The setting of development parameters, which reserve large areas of open space around Run Dyke for recreation and ecological connectivity and open space for formal play (for which there is a site allocation requirement), is considered a positive aspect of the proposal with the potential to preserve and enhance this strong landscape feature within the proposed development.

Impacts of the development on the Broads Authority's area are considered negligible.

**Ecology**

The Broads Authority agrees with the ecological assessments submitted and is supportive of the enhancements suggested within the country park, including the river corridor, to mitigate the impact of development and enhance the quality for the sale of these properties.

I would be grateful to receive a copy of the Decision Notice for my file in due course.

Yours sincerely

Cally Smith
Head of Planning
Rt. Hon. Keith Simpson MP
House of Commons
London
SW1A 0AA

Dear Keith

Planning Application - Brundall

Thank you for your email and the associated correspondence from some of your constituents which gave an insight into the concerns and objections of local people.

The application they refer to has only recently been submitted to Broadland District Council and it is still relatively early in the determination process. However, I can assure you that the comments of all local people will be taken into account in the determination of the application.

You will also be aware that any such representations must also be considered in the context of the relevant planning policies, including the Neighbourhood Plan, and National Planning Policy Guidance (NPPF). All of these documents are relevant and material to any future decision made by the Local Planning Authority.

I hope that this provides you with sufficient information to enable you to respond to your constituents, however should you have any further queries, please do not hesitate to contact me.

Yours sincerely

Phil Kirby
Chief Executive
Dear Nigel

Thank you for your consultation on the above site, please find attached the county councils response.

Thanks,
Laura Waters

Senior Infrastructure and Economic Growth Planner
Community and Environmental Services

Telephone: 01603 638038
Email: laura.waters@norfolk.gov.uk

----- Original Message -----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 16 August 2017 11:25
To: Waters, Laura
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk

In any correspondence, please quote the Council reference number, which is included in the attached letter.

If you have received this email in error, please forward it to planning@broadland.gov.uk

If you cannot open the attachment you can download the following software free of charge:
- Microsoft Word Viewer for Word attachments.
- Adobe Reader for PDF attachments.

To see our email disclaimer click here <a href="http://www.norfolk.gov.uk/emaildisclaimer">http://www.norfolk.gov.uk/emaildisclaimer</a>
Dear Nigel

Infrastructure Requirements: Proposed Residential Development
Land east of Memorial Hall, Brundall
Application No. 20171386

Thank you for consulting the County Council on the potential infrastructure, service and amenity requirements arising from the above proposal as they relate to matters covered in the County Council’s education, library, fire and green infrastructure projects. It is assumed that you have consulted the County Council separately as Highway Authority and as Lead Local Flood Authority.

The comments attached are made “without prejudice” and are an officer-level response to your consultation. The requirements are based on 170 dwellings.

It should be noted that the attached comments are only valid for six months from the above letter date and therefore the County Council would expect to be re-consulted if the proposal is not determined in this period.

While the County Council acknowledges that most infrastructure requirements would need to be funded through the Community Infrastructure Levy (CIL), some might still need to be funded either through a separate legal agreement (e.g. S106 agreement) and/or planning condition.

The County Council would have serious concerns if funding for the attached list of infrastructure requirements mitigating the impact of this development, could not adequately be addressed/delivered through CIL; S106 and/or condition.

Continued...
Please could you inform the planning obligations team when the application has a resolution to approve, either by committee or through delegated officer powers, so we can then instruct our solicitors as soon as possible in order to avoid any delay in the S106 process.

Please could you keep me informed of any obligations and/or conditions sought from the applicant; and forward the infrastructure requirements to your CIL distribution team.

Should you have any queries with the above comments please call me on (01603) 638038 or Stephen Faulkner (Principal Planner) on (01603) 222752.

Yours sincerely

Laura Waters
Senior Planner

Encl
The following infrastructure will need to be funded through CIL

Education: Additional places required at Early Education, Primary, High School and Sixth Form levels at schools set out below.

Library: Mitigation required at Brundall library to develop self-service system for local area.

Education:

Children generated from this development:

<table>
<thead>
<tr>
<th>Early Education age: 16</th>
<th>Primary School age: 44</th>
</tr>
</thead>
<tbody>
<tr>
<td>High school age: 29</td>
<td>Sixth Form age: 3</td>
</tr>
</tbody>
</table>

Current situation at the local schools:

<table>
<thead>
<tr>
<th>School</th>
<th>Capacity</th>
<th>Numbers on Roll (May 2017)</th>
<th>Spare capacity No. of places</th>
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</thead>
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<tr>
<td>Early Education sector (2-4)</td>
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<tr>
<td>Blofield Primary (4-11)</td>
<td>202</td>
<td>219</td>
<td>-17</td>
</tr>
<tr>
<td>Brundall School (4-11)</td>
<td>293</td>
<td>251</td>
<td>+42</td>
</tr>
<tr>
<td>Thorpe St. Andrew School and Sixth Form (11-18) (excluding mobiles)</td>
<td>1726</td>
<td>1843</td>
<td>-117</td>
</tr>
</tbody>
</table>

Although there is currently spare capacity at Brundall School and at Early Education level, Blofield Primary School is already full and taking into account the permitted and pending planning applications (20141710, 20121587, 20160488, 20130296, 20161483 and 20120167) both Blofield and Brundall primary schools will be full, as well as the Early Education sector.

Housing growth in the whole area and pupil number forecasts indicate that the Blofield and Brundall primary schools and the Early Education sector are likely to exceed their capacity. Brundall School is on a restricted site and it is unlikely that
much expansion could happen there. With the prospective housing in the area we would need a further 100 + primary places, which would put both Blofield and Brundall schools under pressure and Thorpe St. Andrew School and Sixth Form is unable to accommodate the children generated from this proposed development should it be approved.

It is therefore expected that the funding for the additional school places required at Early Education, Primary, High School and Sixth Form levels would be through CIL as this is covered on the District Council’s Regulation 123 list.

Library: A development of 170 dwellings would place increased pressure on Brundall library and mitigation is required to increase the capacity of the library.

Fire: This development will require 1 fire hydrant per 50 dwellings at a cost of £815 per hydrant, which should be dealt with through condition.

Green Infrastructure: Connections into the local Green Infrastructure (GI) network, including Public Rights of Way and ecological features, should be considered alongside the potential impacts of development. Direct mitigation and GI provision should therefore be included within the site proposal. Mitigation for new and existing GI features identified as strategic shall be funded by the Community Infrastructure Levy (CIL) through the Greater Norwich Investment Programme. These requirements for consideration and implementation, for both on and off-site GI provision, will help the local GI network to facilitate the development without receiving negative impact and equally, allow the development to integrate and enhance the existing network.

Green Infrastructure within this proposal should respond to the Greater Norwich Green Infrastructure Strategy (2007) which informs the Joint Core Strategy, adopted January 2014. Development proposals are expected to fit with strategic visions for the area and respond to corridors as outlined in the Joint Core Strategy.

Should this development intend to be the first phase of a larger development or vision, consideration will need to be given to how the local GI network will be impacted, adapted and enhanced in the future.
Dear Mr Harriss,

Public Rights Of Way Consultee response regarding:  
20171386 Land East of Memorial Hall, Brundall. Hybrid application

Thank you for your consultation regarding the above.

I note that there are plans to ‘redirect’ Brundall Footpath 1 within the application. This will require an application to the relevant local authority asking it to use its powers under section 257 of the Town and Country Planning Act 1990. This application must be confirmed before any works are started that obstruct or remove the existing Public Right of Way. It should also be noted that it is not acceptable to divert a rural public footpath onto a footway beside a road.

It is also noted that there are new access provisions within the proposal. Clarification is required as to the future ongoing maintenance of these routes, for example: Is there a maintenance committee to be set up to look after the country park and its associated access and infrastructure?

Development should integrate into the existing highway network, be that roads, footways or Public Rights of Way. In this instance the application does provide good links to the wider Public Right of Way network. Norfolk County Council Environment Team would require a contribution, proportionate to the development, towards the improvement of the immediate rights of way in order to facilitate this increase in use.

Regards,

Sarah

Sarah Leece
Trails Officer
Community and Environmental Services

Norfolk County Council
General Enquiries: 0344 800 8020 or information@norfolk.gov.uk

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-----Original Message-----
From: planning
Sent: 07 September 2017 11:39
To: Nigel Harriss
Subject: FW: Land East of Memorial Hall, Brundall - 20171386 [ME-170907-835134]
Attachments: FWP 17 5 5203 Response.pdf

-----Original Message-----
From: Lead Local Flood Authority [mailto:llfa@norfolk.gov.uk]
Sent: 07 September 2017 09:58
To: planning
Subject: RE: Land East of Memorial Hall, Brundall - 20171386 [ME-170907-835134]

Good Morning,

Please find attached our response to this consultation.

Kind Regards,

Cathryn

Cathryn Brady
Assistant Flood Risk Officer
Community and Environmental Services
Lead Local Flood Authority

Email: llfa@norfolk.gov.uk for any planning enquiries or statutory planning consultations
Email: water.management@norfolk.gov.uk for any reports of flooding, watercourse regulation or general enquiries.

Norfolk County Council general enquiries: 0344 800 8020, information@norfolk.gov.uk or www.norfolk.gov.uk

-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 16 August 2017 11:37
To: Lead Local Flood Authority <llfa@norfolk.gov.uk>
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk

In any correspondence, please quote the Council reference number, which is included in the attached letter.
Dear Mr N Harriss,

Town and County Planning (Development Management Procedure) (England) Order 2015

Hybrid Application - 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 (Class C2 and C3 Use); 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 Plans at Land East of Memorial Hall, Brundall.

Thank you for your consultation on the above site, received on 16th August 2017. We have reviewed the application as submitted and wish to make the following comments.

The applicant has provided a Flood Risk Assessment (FRA) and Drainage Strategy in support of this hybrid application.

We object to this planning application in the absence of acceptable supporting information relating to:

- To protect ground water from pollution, any infiltration structure must be shown to be able to be constructed 1.2 m above the anticipated seasonally high groundwater level.

- For the first phase of the development, for which full permission is sought, insufficient information has been provided to demonstrate that surface water can be
managed on the site and discharged to the ground via infiltration without resulting in an increase in the risk of flooding elsewhere.

- For the first phase of the development, for which full permission is sought, modelling, calculations and plans should be provided for the entire the drainage conveyance network.

- For the first phase of the development, for which full permission is sought, insufficient information has been provided regarding exceedance flows.

- For the first phase of the development, for which full permission is sought, insufficient information has been provided regarding the future adoption and maintenance of the entire drainage system.

**Reason**

To prevent flooding in accordance with National Planning Policy Framework paragraph 103 and 109 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the surface water drainage system operates as designed for the lifetime of the development.

We will consider reviewing this objection if the following issues are adequately addressed.

- Evidence should be provided to show that an unsaturated zone of 1.2m is maintainable beneath the base of any infiltration feature. If it is not possible to maintain a 1.2m unsaturated zone beneath the base of any infiltration feature, an alternative strategy should be provided.

- For the first phase of the development, further infiltration testing representative of the depth and locations of the proposed infiltration features should be provided.

- For the first phase of the development, detailed designs, modelling calculations and plans should be provided for the entire the drainage conveyance network.

- For the first phase of the development, a plan showing finished ground levels should be provided.

- For the first phase of the development, information should be submitted regarding the future adoption and maintenance of the entire drainage system.

Further detailed comments can be found in the attached Annex.

Further guidance on the information required by the LLFA from applicants can be found at [https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers](https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers).
If you, the Local Planning Authority review and wish to determine this application against our advice you should notify us, the Lead Local Flood Authority, by email at llfa@norfolk.gov.uk so that appropriate conditions can be placed on the development.

Alternatively, if further information is submitted, we request we are re-consulted and we will aim to provide bespoke comments within 21 days of the formal consultation date.

Yours sincerely,

Cathryn

Cathryn Brady
Assistant Flood Risk Officer

Lead Local Flood Authority

Disclaimer
We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.
Annex: Norfolk County Council LLFA Additional Information to LPA

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<th>LPA Application Ref: 20171386</th>
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<td>Site name/Description: Land East of Memorial Hall, Brundall</td>
<td>Greenfield or Brownfield Development: Greenfield</td>
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<td>Summary of Surface Water Drainage Proposed: Infiltration via soakaways, permeable paving, swales</td>
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Local Flood Risk: Summary of Local Flood risks in the vicinity of the site

- There are areas of medium to high risk of surface water flooding within the development site boundary of 1 in 30 (3.33% annual probability) and 1 in 100 (1% annual probability) flood event as shown in the Environment Agency’s Risk of Flooding from Surface Water (RoFSW) maps.
- There are watercourses known to exist within and on the boundary of the site. The site is bordered to the North by the main river known as Run Dyke. A drain within the site boundary runs roughly parallel to Run Dyke.
- The site partially lies within an Internal Drainage Board (IDB) area for the regulation of ordinary watercourses (Broads IDB). It is not clear whether the IDB have been consulted.
- The FRA states that groundwater was not encountered in any of the boreholes (excavated to 2mbgl). The FRA also states that historic nearby boreholes recorded groundwater at depths of 3.3mbgl adjacent to the river.
- We are not aware of any records of sewer flooding, however this would need to be confirmed with Anglian Water.
- There are no LLFA records of incidents of internal flooding on or adjacent to the site. However it should be noted that our records only cover the period of 2011 to the present day.
- There are areas of fluvial flood zone 3 within the site boundary.

Policy: What we expect relating to site drainage and flood risk management.

The following national and regional policies apply to flood risk management within the planning framework.

Paragraph 103 of the National planning policy framework (NPPF)

Ministerial statement (HCWS161)

Policies UC10 and UC11 of LLFA Local Flood Risk Management Strategy

The LPA will also have policies relating to flood risk management and applicants are recommended to have regard to these.

Specifically in Broadland the following policies apply:

www.norfolk.gov.uk
Policy 1 (Addressing climate change and protecting environmental assets) of the Joint Core Strategy for Broadland, Norwich and South Norfolk (2011) states that, "Development will be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage".

Policy 20 (Implementation) of the Joint Core Strategy states that, "A co-ordinated approach will be taken to the timely provision and ongoing maintenance of infrastructure, services and facilities to support development... Infrastructure that is essential to secure sustainable development will include ... sustainable drainage systems (SuDS)."

Policy CSU5 of the Broadland Development Management DPD states that "Mitigation measures to deal with surface water arising from development proposals should be incorporated to minimise the risk of flooding on the development site without increasing risk elsewhere.

In particular, within the Critical Drainage Catchments and other areas at significant risk of flooding as identified by the Lead Local Flood Authority, all development proposals involving new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given to mitigating surface water flood risk.

Developers will be required to show that the proposed development would:

i. Not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; and

ii. Wherever practicable, have a positive impact on the risk of surface water flooding in the wider area.

Development must, as appropriate, incorporate mitigation measures to reduce surface water runoff, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on site water storage and make use of green roofs and walls wherever reasonably practicable."

Guidance: Information for developers

Information for developers can be found on our website

https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers

Assessment: Summary of assessment of flood risk and submitted drainage proposals

The Flood Risk Assessment / Drainage Strategy (Rossi Long Consulting, 161068, July 2016) submitted with the planning application, has been assessed against the National Planning Policy Framework (NPPF), Planning Practice Guidance, the SuDS Non-Statutory Technical Standards

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(NSTS) (March, 2015) and the policies of the adopted Norfolk Local Flood Risk Management Strategy as follows:

- The site contains areas at risk of both surface water ponding, and fluvial flooding (flood zone 3). The development parameters schedule and plans report prepared by Barton Wilmore LLP (August 2017) shows the development area, which does not extend to the areas modelled as being at risk of flooding (fluvial or surface water) in the 1:100 year event. These areas are instead intended to be designated as a country park. **If land raising is proposed here, the Environment Agency should be consulted.**

- The FRA states that there are no site or field ditches on site. As shown in the location plan, there are IDB drains on site, although these are shown by the development parameter plans as being outside of the development area.

- The SuDS discharge location hierarchy has been followed and infiltration has been proposed as the primary method of surface water drainage on site via soakaways (for roofs and adoptable highway) and either swales or permeable paving (for private drives and access roads). Infiltration testing in three locations on site support the concept that a drainage strategy reliant on infiltration is feasible at the outline stage.

- However, intrusive ground investigations on site (to a depth of 2m) did not discover any groundwater, there is insufficient evidence to show that an unsaturated zone of 1.2m is maintainable beneath the base of any infiltration feature. **We recommend that further information is provided.** If it is not possible to maintain a 1.2m unsaturated zone beneath the base of any infiltration feature, an alternative strategy should be provided. If no further on site investigation is carried out for the part of the site for which only outline permission is sought, an alternative strategy should also be provided, in case infiltration proves to not be viable.

- For the first phase of the development, for which full permission is sought, **further infiltration testing should be carried out, representative of the depth and locations of the proposed infiltration features.** This is especially important given the varied nature of the three boreholes on site, all of which experienced a clay layer.

- For the first phase of the development, for which full permission is sought, detailed designs, modelling calculations and plans should be provided for the entire the drainage conveyance network showing no above ground flooding on any part of the site in the 1 in 30 year critical rainfall event, and the depth and volume and storage location of any (if any) above ground flooding from the drainage network in the 1 in 100 year critical rainfall event (plus climate change) ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. Microdrainage calculations have been provided within the FRA, however it if not clear which soakaway features these relate to. **We recommend that further information is requested.**

- For the first phase of the development, for which full permission is sought, it appears that permeable paving is proposed (drawing ref SK-120). This should be clarified, and
calculations should be provided as detailed above. **We recommend that further information is requested.**

- For the first phase of the development, for which full permission is sought, a plan showing finished ground levels should be provided to confirm exceedance routes (it is assumed that the arrows on drawing ref SK-120 represent exceedance flows, this should be confirmed). **We recommend that further information is requested.**

- For the first phase of the development, for which full permission is sought, consideration needs to be given to the ongoing management and maintenance of all drainage features over the lifetime of the development. A maintenance plan identifying the required actions and responsible owners should be submitted to ensure that all parties understand their responsibilities. This includes all drainage infrastructure, including pipes and soakaways to be adopted by the Highways Authority (including confirmation of adoption). **We recommend that further information is requested.**

- For later phases of the development, for which outline permission is sought, the applicant has not identified exceedance routes for flows in excess of a 1 in 100 year rainfall event. **This will be expected at detailed design stage.** Consideration should be given to the expected depth/velocity of flood water to quantify any potential risks to people and property in the event of exceedance of the drainage inlets.

- We would request comment on how different phases rely on each another for the disposal of surface water (for example access road drainage) and how this will be implemented during construction and operation of the development.

- For later phases of the development, for which outline permission is sought, a maintenance plan should be submitted at the detailed design stage.

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**SuDS Standards:** Summary of alignment to relevant Non-Statutory Technical Standards for Sustainable Drainage systems

*S2* – As the proposed strategy is reliant on infiltration up to the 1:100 year (plus climate change) event, it is inferred that runoff rates will not increase post-development for the 1 in 1 and 1 in 100 years rainfall events. This should be maintained during detailed design.

*S4/S6* – As the proposed strategy is reliant on infiltration up to the 1:100 year (plus climate change) event, it is inferred that runoff volume will not increase post-development.

*S7* – The applicant has provided calculations showing that the attenuation basin is sized to accommodate the 1:30 year event, however it is not clear which infiltration devices these calculations refer to. This should be clarified.

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[Website Link: www.norfolk.gov.uk]
S8 – The applicant has provided calculations showing that the attenuation basin is sized to accommodate the 1:100 year + climate change event, however it is not clear which infiltration devices these calculations refer to. This should be clarified.

S9 – The applicant has not provided sufficient information to demonstrate how exceedance flows will be managed to avoid risks to people and property.
Hi Nigel

This layout is the best so far it provides lots of links out of the site. I have two comments.
1. I would recommend a raised table or some such where the road cuts across the two sides of the site. This could reinforce the importance of the open space.
I think the location of changing rooms/club house and any car parking needs careful consideration given there are flats overlooking the sports area.
I know it is not for this application but if the Parish Council had aspirations for floodlights this might also be an issue given the proximity of the flats.

Comments made by Mr Bob Fell of BDC, Thorpe Lodge, NR7 0DU Phone 01603 430425 EMail bob.fell@broadland.gov.uk Preferred Method of Contact is Post

Comment Type is Comments
Hello Nigel

This one has taken a long-time, but please find our comments attached.

Kind regards

Dave

David White MCIEEM
Senior Green Infrastructure Officer
Natural Environment Team
Norfolk County Council

david.white.etd@norfolk.gov.uk
Direct dial: 01603 222058
NCC general enquiries: 0344 800 8020

To see our email disclaimer click here http://www.norfolk.gov.uk/emaiddisclaimer
Your Ref: 20171386  
Date: 05.09.17

Dear Nigel,

RE: Land East of Memorial Hall, Brundall; Hybrid Application - 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 (Class C2 and C3 Use); a Community/Sports Pavilion (Class D1 and D2 Use); a Country Park; Formal Outdoor Sports Provision; Access; ECOLOGY COMMENTS

The Natural Environment Team at Norfolk County Council provide ecological advice for Broadland District Council under a Service Level Agreement. We were formally consulted on this application on 16th August 2017.

The application is supported by an Ecological Appraisal (Hankinson Duckett Associates, July 2017) backed-up by a number of species-specific survey reports. The reports have to be read together, as the appraisal does not summarise all information.

In essence we are inclined to think that the ecology reports, in combination, are broadly fit for purpose, although we have some concerns that the ecological value of the site is assessed as lower than previous work has indicated. As such, it follows that we also consider that the mitigation proposed may be insufficient.

Lack of consideration of Ecological connectivity:
In our opinion the ‘tone’ of the assessments is to underplay the ecological value of the site, specifically in its wider landscape context. The report is very focused within the ‘red-line’, and references to the value of wider ecological connectivity along the Witton Run (Run Dyke) are limited in number and minimal in scope.

The Witton Run and its associated valley directly connect with the Broads SAC and the Broadland SPA, through the Strumpshaw Fen RSPB Reserve (the RSPB reserve is not referred to in the ecological assessment). Although mentioned ‘in passing’ in the assessments, we feel this direct connectivity with the Natura2000 Site is not given the appropriate significance (e.g. adverse impacts are effectively dismissed given “the distance to the SPA” and “the presence of Brundall in-between the application site and the SPA”).
Like many tributaries of Norfolk rivers, the Witton Run and its associated valley historically has been less-intensively farmed than the surrounding ‘higher’ land (which is of better quality in terms of agriculture). As such, the less-easily farmed wetter valleys generally have retained much more semi-natural vegetation than the heavily-farmed plateaux. This is certainly true of the Witton Run Valley, and is reflected in the presence of four designated County Wildlife Sites in the 7km valley (with other land that probably meets CWS criteria although land owner consent for surveys to confirm this has not been agreed to date).

**Lack of reference to existing GI work to support planning in greater Norwich:**
The ecological assessment makes no reference to a suite of Green Infrastructure and ecological connectivity work that has been completed in the Greater Norwich Area funded and commissioned by the GNGB. It does not mention the GI corridors of the Greater Norwich Growth Board *Green Infrastructure Strategy* (GNGB, 207) which underlies Policy 1 of the JCS and which was based on the (also unmentioned) ‘Econet’ work undertaken by the Norfolk Wildlife Trust. The *Greater Norwich Green Infrastructure Delivery Plan* (GNGB 2009) identifies the entire Witton Run as a ‘Core Biodiversity Area’ and identifies the area proposed for housing in the current application as a ‘Habitat Enhancement Area’.

We note the letters in the Appendix from officers from the EA and The Broads Authority ecologist that relate to ecological enhancements to parts of the site, and involving other partners is helpful. We have not been involved in any discussions (despite the fact that we provide ecological advice to the GNGB and to Broadland Council) and we would have been able to advise the ecological consultants on these useful documents.

**Recommendation:**
If you are minded to approve this application, we would recommend that you condition

- A Construction Environmental Management Plan (CEMP). This could be a stand-alone CEMP just for ecology (CEMP: Biodiversity), or biodiversity could be included in a CEMP with a wider scope. Any CEMP should be agreed in writing prior to any works commencing on-site including any vegetation or ground clearance. A model condition from BS42020:2013 is included below these comments.

- An Ecological Management Plan (or Habitat Management Plan) ensuring the long-term management and maintenance of ecological features. The EMP should also include details of the legal and funding mechanisms by which the long-term implementation of the plan will be secured by the developer. The plan should also set out (where the results of monitoring show that conservation objectives of the EMP are not being met) how remedial action will be identified, agreed and implemented so the development still delivers the fully function biodiversity objectives.

In this case, an EMP could be combined with a management plan for the proposed Country Park. However a very clear distinction would need to be made as to the separate functions of biodiversity and public access.

Kind regards,

Dr David White, MCIEEM
Senior Green Infrastructure Officer
Model Conditions from BS42020:2013 *Biodiversity – Code of Practice for Planning and Development.*

**Construction Environmental Management Plans (biodiversity) – Condition**

"No development shall take place (including demolition ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP: Biodiversity shall include the following:

- Risk assessment of potentially damaging construction activities;
- Identification of 'biodiversity protection zones';
- Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction;
- The location and timing of sensitive works to avoid harm to biodiversity features;
- The times during construction when specialist ecologists need to be present on site to oversee works;
- Responsible persons and lines of communication;
- The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;
- Use of protective fences, exclusion barriers and warning signs.

The approved CEMP: Biodiversity shall be adhered to and implemented through the construction phases strictly in accordance with the approved details, unless agreed in writing by the local planning authority."

**Habitat Management Plan/Ecological Management Plan – Condition**

"An ecological management plan (EMP) shall be submitted to, and approved in writing by the LPA prior to commencement of development. The content of the EMP shall include the following.

a) Description and evaluation of features to be managed,
b) Ecological constraints on site that might influence management
c) Aims and objectives of management
d) Appropriate management options for achieving aims and objectives including mitigation detailed in the ecological assessment submitted with the application, including but not exclusively in relation to
   - Enhancements to the river, including a river restoration scheme in line with the principles outlined by the Environment Agency included in the Ecological Appraisal
   - The establishment and maintenance of riparian habitats including a mosaic of scrub, wet woodland and fen/marsh habitats,
   - Protection and enhancement of hedgerows
   - Protection and enhancement of bat feeding and commuting corridors,
   - Nest boxes for birds and bat boxes,
e) Prescriptions for management actions
f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period)
g) Details of the body or organisation responsible for implementation of the plan
h) On-going monitoring and remedial measures

The EMP shall also include details of the legal and funding mechanisms by which the long-term implementation of the plan will be secured by the developer. The plan shall also set out (where the results of monitoring show that conservation aims and objectives of the EMP are not being met) how remedial action will be identified, agreed and implemented so the development still delivers the fully function biodiversity objectives of the originally approved scheme."
FAO: Mr N Harriss
Please find attached our response to the above planning application.

In accordance with the Planning Practice Guidance, please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Where we have objected: If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

If the application is to be determined by Planning Committee and your report has already been finalised, we ask that our response is provided to the Committee members, either verbally or as supplementary report.

Kind regards

Pat

Pat Abbott | Sustainable Places Planning Advisor
Environment Agency | Iceni House, Cobham Road, Ipswich, Suffolk IP3 9JD
Pat.abbott@environment-agency.gov.uk
Tel: 0208 4748011

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Dear Mr. Harriss

HYDRID APPLICATION - OUTLINE PLANNING APPLICATION WITH THE DETAILS OF APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED FOR LATER DETERMINATION. WITH EXCEPTION OF PHASE 1 FOR WHICH DETAILS OF ALL MATTERS IN RELATION TO THE 23 DWELLINGS WITHIN THAT PHASE ARE PROVIDED. DEVELOPMENT TO COMPRISIE UP TO 170 DWELLINGS, A COMMUNITY SPORTS PAVILION, A COUNTRY PARK. FORMAL OUTDOORS SPORTS PROVISION, ACCESS AND OTHER EARTHWORKS AND ENGINEERING WORKS. LAND EAST OF THE MEMORIAL HALL, BRUNDALL, NORFOLK

Thank you for your consultation dated 17 August 2017. We have inspected the application as submitted and have no objection to the planning application, providing that you are satisfied that the development would be safe for its lifetime and you assess the acceptability of the issues within your remit. Our letter contains detailed comments in relation to flooding.

Flood Risk

The applicant commissioned fluvial flood modelling of Witton Run, a designated Main River, which has demonstrated that the development itself has been sequentially sited within flood zone 1.

Our maps show the site boundary lies within fluvial Flood Zone 3a defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding. The proposal is for an 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, a community sports pavilion, a country park. Formal outdoors
sports provision, access and other earthworks and engineering works, which is classified as a 'more vulnerable' development, as defined in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance. We are satisfied that the flood risk assessment, prepared by Rossi Long Consulting, referenced 161068 and dated July 2016, and the Flood Modelling Assessment, prepared by Evans Rivers and Coastal, reference number 1656/RE/07-16/01 and dated July 2016, provides you with the information necessary to make an informed decision. In particular:

- Drawing SK-120 revision P3 shows all proposed development for Phase 1 lies within Flood Zone 1. This drawing also shows that ground floor levels shall be set at a minimum level of 6mAOD, which is above the modelled 1% annual probability (1 in 100 year) flood, inclusive of climate change, of 3.674mAOD.
- The access and egress route travels through Flood Zones 1 and therefore does have a safe route of access.
- Flood Storage Compensation is not required based upon the current proposals.
- Drawing 26007 06 Revision D, titled 'Development Parameters Plan 1 – Finished Ground Levels', implies that some alterations may be made to ground levels across the site. It is not clear from the information submitted whether or not these ground level alterations will be proposed within flood zones 2 or 3, but if they are, then further information will need to be submitted to us to demonstrate that flood risk will not be increased as a result of changes in ground levels.

We recommend the following conditions are appended to any planning permission granted.

Condition

All built development shall be provided within flood zone 1, as detailed on drawing SK-120 Revision P3, submitted in support of this application.

Reason

To reduce the risk of flooding to people and property.

Condition 2

No changes to ground levels within flood zones 2 and 3 (as identified on drawing SK-120 Revision P3), shall be commenced until further evidence, including updated modelling, has been provided to demonstrate that any changes to ground level will not result in increased flood risks on or off the site.

Reason for condition 2

To ensure flood risks, both on and off site, are not increased as a result of the development.
**Sequential Test / and Exception Tests**

The site is located within Flood Zone 1 with a 'low probability' of flooding, with less than a 1 in 1000 annual probability of river flooding in any year (<0.1%). Therefore, the Sequential and Exception Tests will not need to be undertaken as part of this planning application.

**Other Sources of Flooding**

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

**Environmental Permitting Regulations 2010**

The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river. The Witton Run to the north of the site is designated a 'main river'. Application forms and further information can be found at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. Anyone carrying out these activities without a permit where one is required, is breaking the law.

We trust this information is useful

Yours faithfully

[Signature]

Mr. Pat Abbott
Planning Advisor

Direct dial 0208 4748011
Direct e-mail pat.abbott@environment-agency.gov.uk
By email to planning@broadland.gov.uk

6th September 2017

Application No. 20171386: Land East of Memorial Hall, Brundall

Dear Mr Harriss,

I write on behalf of CPRE Norfolk to lodge its objection to this planning application, due to the proposed site’s nature, location and size.

We consider that this proposal should be refused for several reasons. Firstly, that the application site is not identified as being earmarked for housing, as outlined in the Site Allocations DPD (adopted May 2016) for Broadland District Council, covering the period up to 2026. Moreover, the site lies outside the settlement boundary of Brundall as shown in this document. With Brundall being one of the Key Service Centres, the Plan suggests it will receive approximately 50 dwellings out of the total required of 2,000 for the whole non-Growth Triangle area by 2026, with the possibility that it may ‘receive extra development to help deliver these 2,000 dwellings on smaller sites within the Norwich Policy Area’ (page 6, Site Allocations DPD, May 2016.) This document also acknowledges that ‘the housing requirements in the JCS are a minimum, and the allocations made in this DPD for each settlement may be higher than the minimum suggested in the JCS e.g. due to site considerations such as size of site or particular benefit that may arise from a particular proposal (page 4, Site Allocations DPD, May 2016.) It also shows that ‘the housing requirements to 2026 have been more than met’ (page 11, Site Allocations DPD, May 2016), in Table 2, with Brundall and Blofield having been allocated 486 dwellings, therefore to allow this additional development would be unnecessary and unfair.

It should be noted that only part of the application site is allocated for use, and then just for recreational use, not housing. This is the western part of the application site which is designated for open recreational use. There is therefore no requirement for this number of new dwellings in Brundall as part of the Local Plan, as well as the sites not being allocated for housing within the Local Plan.

Within Brundall’s Neighbourhood Plan, the application site is also not included as an area earmarked for housing development, and as such should be left as open, rural land, if part of it is not to be developed as a Community Facility for recreational use.

It is the case that that part of Broadland within the Norwich Policy Area does not (unless a new assessment proves otherwise) demonstrate a 5-year land supply for housing. However, we feel that this should not outweigh the other considerations already noted, especially as the site lies outside the settlement boundary for Brundall. In the recent Supreme Court judgements in Suffolk Coastal District Council v Hopkins Homes and Richborough Estates v Cheshire East Borough Council there is a significant ruling about the interpretation of paragraph 49 of the National Planning Policy Framework (NPPF.) In their judgement, the judges supported a narrow definition of ‘policies for the supply of housing’, meaning that local policies seeking to prevent development outside settlement boundaries, and/or protect areas of important countryside, are not to be automatically considered out of date in the absence of a five-year housing land supply.

The intent to build on open greenfield should be resisted while other solutions less harmful to the environment are investigated. This should be considered particularly in light of the recent Housing White Paper, Fixing our broken housing market, with its emphasis on the need to develop brownfield and surplus public

President: Professor Tim O’Riordan
Chairman: Christopher Dady
Treasurer: Graham Sillett

Registered charity number 210706
land first, as well as considering other solutions including higher density urban housing. We urge that a register of brownfield sites within the local authority area is completed promptly, so that any supposed need for development on greenfield can be weighed up against potential brownfield sites.

Yours sincerely,

Michael Rayner
Planning Campaigns Consultant, CPRE Norfolk
Hi Nigel

Land East of Memorial Hall, Brundall - 20171386
Please see attached the Enabling comments for the above Hybrid Planning Application.

Best wishes
Kay
Memo

To: Nigel Harriss
From: Kay Ogrieve-Chan
CC: Hazel Ellard
Date: 6 September 2017
Re: Planning Application (Hybrid) 20171386

Description: Hybrid Application - Outline Planning with the exception of Phase 1 which is for 23 Dwellings within that Phase.
Location: Land East of Memorial Hall, Brundall
Applicant: Quantum Land (Brundall) Ltd

It is noted that this is a Hybrid application with Outline application for development to comprise up to 170 dwellings (Class C2 and C3 Use); a Community/Sports Pavilion (Class D1 and D2 Use); a Country Park; Formal Outdoor Sports Provision; Access and other Works. All details of all matters in relation to the 23 Dwellings within Phase 1 are provided within this application.

Phase 1 of this Hybrid application is for 23 dwellings and the applicants propose to deliver 8 affordable dwellings. The Greater Norwich JCS Policy 4 requires that for a scheme of this size at least 33% of the dwellings should be affordable, so the correct number of affordable units is proposed.

Within the Planning statement the applicant has provided the following proposed affordable housing which at present is all indicated as being for intermediate tenure. However the Planning Statement indicates that the units are designed as being tenure blind and so the proposed tenure split on the affordable units on this Phase could be:-

ART X 6 units
2 x 1 bedroom 2 person flats (~50m2)
2 x 2 bedroom 4 person house types (77-78m2)
2 x 3 bedroom 6 person house types (94-99m2)

Intermediate units x 2
1 x 2 bedroom 4 person house types
1 x 3 bedroom 6 person house types
It is encouraging to note that the applicants are proposing to deliver all the affordable units to meet Level 1 space standards. This will ensure that all of the units for ART will achieve maximal occupation in Housing Terms. These good size units are required to ensure that nominations can be made within the requisite timescales for RP’s operating within the district. By building to Level 1 space standards this will also meet all RP’s Design and Quality standards.

I note that the applicants are proposing house types that can achieve maximal occupation for all house sizes (Drawings HT09, HT10, and HT11). It is assumed that the 1 bedroom flats are shown by Drawings HT07 as there is no specific affordable house type for these. But these show units with separate front doors and built to appear as houses with their own garden space.

It is also assumed that two of the above units will be as intermediate tenure (so for shared ownership or shared equity). This would give an ART: intermediate tenure split of 75:25 which exceeds the JCS Policy requirements for intermediate tenure. The suggested units for intermediate tenure could be one of each of the 2 bedroom and 3 bedroom house types.

For future Phases of this site the applicants are proposing an additional 147 dwellings of unknown type. When residential dwellings are proposed it is expected that the applicants will deliver the Policy requirement of 33% affordable dwellings, and this is verified by the applicant within the Planning Statement.

It would also be expected that the applicants refer to Enabling for a proposed housing mix for future Phases on this site, to ensure that this meets both current and local housing need. This could then take into account the recent delivery of new build affordable homes within the parish at Cucumber Lane and Vauxhall Mallards - both of which sites nominated up to a third of the ART units for local lettings.

As per the Council’s Housing Allocation policy, up to a third of the units for rent on all Phases of this site will be for local lettings. This includes current residents of the parish of Brundall, those working in the parish or those with a close family connection in the parish.

Applicants for the intermediate tenure units will also need to demonstrate a local connection to Broadland District and be approved by the Council. They will also need to be registered and approved by Help to Buy to ensure they are in need of an affordable home ownership product.

As a final comment we would expect to see a more varied mix of property types on subsequent Phases of the development to include 1 bedroom house types - plus bungalows (1, 2 and 3 bedroom) to better meet the needs of the elderly and those with a disability. These bungalows should be provided as affordable homes for ART but can also include some for affordable home ownership (if a market need is identified).

Kay Ogilvie-Chan

Housing Enabler
Hello, yes that's fine if I can receive these by the end of the month.

Regards

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

Tel: 01603 430529
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 following the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure.

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To: Broadland District Council

FAO: Mr N. Harriss (nigel.harriss@broadland.gov.uk)
Re: Planning Application Number 20171386 - Land East of the Memorial Hall, Brundall
Request for extension of deadline to submit comments

Dear Mr Harriss

I am writing to request an extension to the deadline for comments in respect of the above Planning Application (20171386). The school only returned from the summer break this week and I have therefore
only just become aware of the application. Furthermore, I need to discuss and agree our comment for submission with the School's Board of Governors who are not scheduled to meet until the evening of Monday 25 September, and it is not possible for them to meet any sooner. Therefore we would appreciate you granting an extension for the school to submit its comments.

Thank you for your consideration of this request and I look forward to hearing from you.

Kind regards
Rick Stuart-Sheppard

Headteacher

Brundall Primary School
Nigel Harriss

From: planning
Sent: 04 September 2017 08:23
To: Nigel Harriss
Subject: Brundall 20171386
Attachments: 17-1386.docx

From: John Hiskett [mailto:johnh@norfolkwildlifetrust.org.uk]
Sent: 01 September 2017 16:10
To: Planning Administration
Subject: Brundall 20171386

NWT comments attached

John Hiskett
Senior Conservation Officer

Office: 01603 625540
Fax: 01603 598300
Web: www.norfolkwildlifetrust.org.uk

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NORFOLK WILDLIFE TRUST
Response to Planning Consultation

29th August 2017

Outline application for up to 170 dwellings, country park etc: 20171386

Thank you for consulting Norfolk Wildlife Trust regarding this development. On the basis of the information provided, we have the following comments to make. Our comments relate to biodiversity issues within the proposal.

On a general note we are pleased to see that the proposal includes a high percentage of green space over and above an area to be set aside as a county park. Provision of informal open space close to new housing is an important part of helping to reduce pressure on designated site elsewhere in the county.

We note that the application is supported by an Ecological Appraisal (EA) and associated species surveys. We do not disagree with the findings of the EA. The EA makes clear that although the majority of the habitats on the site are of limited biodiversity value that the area alongside the Run Dike is of high local importance (described as swamp tall ruderal mosaic in the Phase I Habitat Survey Plan of the EA). This importance is increased because the dike forms part of an ecological corridor that runs along the length of the Run Dike connecting Plumstead (where the watercourse is known as Witton Run) with the Broads SSSI and is made up of habitats typical of the that designated site. This is recognised in the EA which states in section 8.3.1 that

"in addition to providing habitat of notable nature conservation interest in its own right, including areas of NERC Act Habitats of Principal Importance such as reedbeds, river and a pond, they form part of a wider network of riparian and wetland habitats across the surrounding landscape. This includes statutory designated sites in the wider area including the Broadland Ramsar and SPA, The Broads SAC and the Yare Broads and Marshes SSSI in addition to a number of locally designated County Wildlife Sites"

As such maintenance of the Run Dike as an ecological corridor is of critical importance and we are pleased to see that this area, along with adjacent area of grassland to the south of Run Dike is earmarked as Country Park in the application. This is recognised in the proposal and highlighted in section 8.3.5 of the EA, which states that

"The Development Parameters plans and Phase 1 Planning Layout (Barton Wilmore 2017) accompanying the application identify that the areas of wetland and semi-improved grassland habitats associated with the Run Dike corridor will be retained within a ‘Recreation and Ecological Connectivity Zone’, within which a country park will be provided ...".

This section then goes on to make clear that there should be a plan to manage this area for ecological enhancement and appropriate informal recreation.

In our view, in order to protect and properly manage the area of high local importance this area should be subject to a Landscape and Ecological Management Plan (or similar), which should be made a condition of any approval along with sufficient funding to ensure that the area is managed both for people and for wildlife. In this context, we are also pleased to see that it is proposed that the country park will be passed over to the district council initially and then to a local body.

On a wider landscape scale and outside of this application, enhancement of this area as an ecological corridor should be seen as an opportunity to begin to protect and manage the whole of the Witton Run/Run Dike corridor to ensure that adjacent areas along the watercourse are protected and managed as part of the green infrastructure of the district. In our view Witton Run/Run Dike corridor should be a prioritised for GI funding via the Greater Norwich Growth Board.
29th August 2017

In addition to the above we support proposals to retain hedges and trees and to improve ecological connectivity within the whole development site and to protect and improve habitat for protected species.

John Hiskett CEnv MCIEEM
Senior Conservation Officer
Planning Administration

From: EMERSON, Sophie (NHS ENGLAND) <sophie.emerson2@nhs.net>
Sent: 04 September 2017 16:58
To: planning
Cc: THEADOM, Fiona (NHS ENGLAND); ROSSBENHAM, Sally (NHS NORTH NORFOLK CCG)
Subject: RE: Land East of Memorial Hall, Brundall - 20171386

Thank you for the below planning consultation. NHS England Midlands and East (East) liaising with North Norfolk Clinical Commissioning Group (CCG) have now had a chance to review the Planning application (20171386- 170 x dwellings, Land East of Memorial Hall, Brundall) and can advise that due to the scale of this proposed development and premises capacity in the area; there is not an intention to seek Primary Healthcare mitigation on this occasion.

NHS England would therefore not wish to raise an objection to the proposed development.

Other future applications in the area however will be considered as and when they arise.

Thanks and Regards

Sophie Emerson, for and on behalf of Kerry Harding

Head of Estates
NHS England Midlands and East (East)

Telephone: 0113 824 9111

Swift House | Colchester Road | Chelmsford | Essex | CM2 5PF | and West Wing | Victoria House | Capital Park | Fulbourn | Cambridge | CB21 5XB

-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 16 August 2017 11:28
To: HARDING, Kerry (NHS ENGLAND)
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk

In any correspondence, please quote the Council reference number, which is included in the attached letter.

If you have received this email in error, please forward it to planning@broadland.gov.uk

If you cannot open the attachment you can download the following software free of charge:
- Microsoft Word Viewer for Word attachments.
- Adobe Reader for PDF attachments.
Nigel Harriss

From: Stuart Moore
Sent: 04 September 2017 14:58
To: Nigel Harriss
Subject: FW: Land East of Memorial Hall, Brundall - 20171386
Attachments: Consultation Letter (Internal Email)_931348.PDF

Nigel
There does not appear to be any assessment of the ground conditions. Could you go back to the applicant/agent and see if any assessment has been undertaken?
Thanks
Stuart

Stuart Moore
Pollution Control Officer
Broadland District Council
Tel: 01603 430511
Fax: 01603 430616
www.broadland.gov.uk
stuart.moore@broadland.gov.uk

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-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 16 August 2017 11:25
To: Stuart Moore
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

The attached correspondence contains important information; please retain it for your records.

If you would like to respond, please reply to planning@broadland.gov.uk

In any correspondence, please quote the Council reference number, which is included in the attached letter.

If you have received this email in error, please forward it to planning@broadland.gov.uk

If you cannot open the attachment you can download the following software free of charge:
Hi Nigel

Thank you for consulting me on the proposed development on the agricultural land located north of Westfield Road, Brundall.

Further to my original comments made on the 05/01/2017 and having studied the details of the new application I have the following comments.

- Within the Arboricultural Impact Assessment (AIA) provide, it is shown that no trees or groups of trees will be lost as a result of the proposed development, which is good, although the part removal of an existing ‘category B’ hedge; H12 would be required to allow construction of two access roads and three private drives. The loss of this part of the hedge would not be considered significant from a landscape perspective; and has been listed as of ‘low local conservation value, but providing potential habitat for a range of species and makes a contribution to the network of habitat linkages’ within the Ecology Report.

- Section 5.4 - Implications of ground level changes, of the AIA states ‘No significant Changes in relation to the Root Protection Areas (RPA’s) of retained trees are expected to arise as a result of the proposed scheme’. I am a rather sceptical if this will be possible, as the drawing detailing the required level changes DWG No.26007.06_D shows a change from existing levels within a range from -5.0M to + 5.0M, even changes within the RPA’s of + or – 0.25M would have a detrimental effect on the trees future health and retention.

- Details in the form of a topographical survey overlaid by the retained trees RPA’s and showing the finished levels; will be required to clarify if there are going to be any reduction or increase of soil depth which would damage the trees, this should be made available at the earliest opportunity as it will inform the layout to prevent unexpected or unresolvable tree constraint issues as the additional phases come forward.

- Within the section relating to the phase one development it is highlighted that hard surfacing will be within the RPA’s of trees T22, T25 & G16 and the approximate encroachment will be between 4.4 and 12.3%, which is within the maximum 20% recommended within BS5837, the RPA of T17 will be encroached by an estimated 13.5%. Ideally the layout should avoid the retrain trees RPA’s.

- As stated within the AIA a revised Tree Protection Plan (TPP) and Arboricultural Method Statement (AMS) will be required to once a layout has been approved.

- The choice of species listed for the proposed landscaping scheme for phase 1 of the development appears acceptable; with a mix of both native and non-native species and a broad selection of genera, the verge planting along the edge of the access road would form an attractive mixed avenue effect. Details of the planting methods and maintenance regime to ensure the trees establish should be requested.

- The use of a root barrier product such as GreenBlue Urbans ReRoot 600 or 1000 should be included as part of the hardstanding construction; in areas adjacent to the tree planting locations, this would ensure the trees can grow and mature, without the roots causing damage.

- The trees and hedges are detailed in the Landscape & Visual Impact Assessment report and within the Landscape features/Character Appendix 5 Effects Tables on page 123, with the trees being rated as having ‘medium value’ due to being in good condition with a number of mature hedgerow trees, ‘High Susceptibility’ due to their distribution and relationship to the hedgerows and the time it would take to replace them if they were destroyed/damaged and a ‘High Sensitivity’ due to the proposed development. This reinforces the value the trees add to the location and strengthens the case to retain and protect them.

BR
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The site is partly within the Broads Internal Drainage Board district, as per link 

We are pleased to see that the development proposes to have a full infiltration solution and that there are to be no proposed discharges into the BIDB district. Should this change then please note that the applicant will need to contact the board and comply with any bylaw requirements. Should future phases of the development require links to the watercourse then the above statements will also apply.

Comments made by Mr Matthew Philpot of Broads Internal Drainage Board, Austine Fields, Kings Lynn, PE301PH Phone 07884327849 EMail matthew@wlma.org.uk Preferred Method of Contact is Post

Comment Type is Comments
Dear Mr Harriss

Please find the attached Highways England Comments on the above planning application.

Yours Sincerely
Connor Adkins

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: +44 (0) 300 4704744
Web: http://www.highways.gov.uk
GTN: 0300 470 4744

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Developments Affecting Trunk Roads and Special Roads
Highways England Planning Response (HEPR 16-01)
Formal Recommendation to an Application for Planning Permission

From: Martin Fellows
Operations (East)
planningee@highwaysengland.co.uk

To: Broadland District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 20171386

Referring to the planning application referenced above, dated 16 August 2017, application with the details of appearances, 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, Land East of Memorial Hall, Brundall, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A—Highways England recommended Planning Conditions);

c) recommend that planning permission not be granted for a specified period (see Annex A—further assessment required);

d) recommend that the application be refused (see Annex A—Reasons for recommending Refusal).

Highways Act Section 175B ie-1 is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.
<table>
<thead>
<tr>
<th><strong>Signature:</strong></th>
<th><strong>Date:</strong> 31 August 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name:</strong> Davina Galloway</td>
<td><strong>Position:</strong> Asset Manager</td>
</tr>
</tbody>
</table>

**Highways England:**  
Woodlands, Manton Lane  
Bedford MK41 7LW  

davina.galloway@highwaysengland.co.uk
I refer you to the National Planning Policy Framework (NPPF) (2012), the Joint Core Strategy (JCS) (adopted 2011,2014), the Development Management DPD (DMdpD) (adopted 2015), and the Site Allocations DPD (SADPD) (adopted 2016) and the Brundall Neighbourhood Plan.

Key policy matters of particular relevance to the application are:

NPPF

Paragraph 11 refers to planning law which "requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise" (section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990).

Paragraph 13 explains that the NPPF is a material consideration in determining planning applications.

Paragraph 14 refers to "a presumption in favour of sustainable development" at the heart of the NPPF; and for decision-taking, unless material considerations indicate otherwise, "approving development proposals that accord with the development plan without delay"; and

"where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:
- any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted" (with examples given in a footnote, including those policies relating to sites protected under the Birds and Habitats Directives).

Paragraph 17 sets out 12 core land-use planning principles that should underpin planning making and decision-taking. These include that planning should:
- "be genuinely plan-led", with "local and neighbourhood plans setting out a positive vision for the future of the area"; and plans "should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency";
- “proactively drive and support sustainable economic development”, and “Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area”;
- “contribute to conserving and enhancing the natural environment and reducing pollution”;
- “…deliver sufficient community and cultural facilities and services to meet local needs”.

Paragraph 47 refers to the supply of housing, including that Ipa’s should “identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements..”.

Paragraph 49 further states that: “Housing applications should be considered in the context of the presumption in favour of sustainable development”; and “Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”.

Section 11 refers to conserving and enhancing the natural environment, with para 117 requiring impacts on biodiversity to be minimised; and para 118 stating that if significant harm to biodiversity cannot be avoided then planning permission should be refused, and proposed development affecting a SSSI and likely to have an adverse effect should not normally be permitted. Para 113 refers to the distinction to be made to the hierarchy of international, national and locally designated sites so that protection is commensurate with their status, with reference to Circular 06/2005 on the statutory obligations for biodiversity. In particular, Para 119 states: “the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined”.

**Joint Core Strategy (JCS)**

Policy 1 Addressing climate change and protecting environmental assets

Policy 4 Housing Delivery - includes a requirement of 33% affordable housing on sites of 16 dwellings or more (or over 0.6ha).


Policy 14 Key Service Centres.

**Development Management DPD (DMDPD)**

Policy GC1 Presumption in favour of sustainable development.

Policy GC2 Location of new development (settlement limits).

Policy GC4 Design

Policy EN1 Biodiversity and habitats.

Policy EN2 Landscape. (Also see Broadland Landscape Character Assessment SPD).

Policy EN3 Green Infrastructure.

Policy RL1 Provision of formal recreational space.
Policy TS3 Highway safety.

Site Allocations DPD (SADPD)

Paragraph 4.4 explains that Brundall is a Key Service Centre located within the Norwich Policy Area. The site is located in the countryside outside but directly adjacent the Settlement Limit defined under policy GS2 of the DMDPD.

Policy BRU3 allocates a substantial part of the site (4.9ha in the south-western part) for recreational open space. The proposal would allow for recreational use on most, but not all, of the allocation. Therefore, there is a significant conflict with this policy.

Brundall Neighbourhood Plan

The Neighbourhood Plan for Brundall sets out policies for Improving Local centres and gateways (Policy 1); walking and cycling routes (Policy 2); important views (Policy 3); enhanced recreation provision (Policy 4); enhanced provision for older people (Policy 5); and enhanced pre-school provision (Policy 6). Policies 2, 3, and 4 are particularly relevant.

Comments Planning Policy

The application site is in the countryside and outside the defined Settlement Limit for Brundall. Consequently, the proposal conflicts with Policy GC2 of the Development Management DPD. The proposal also does not comply with JCS Policy 17 which limits development in the countryside.

Policy EN2 of the DMDPD seeks to protect the character of the area. Reference is also made in the policy to the Landscape Character SPD. The application site is within Landscape Character Type D Tributary Farmland, character area D4 Blofield.

Policy EN3 of the DMDP requires the provision of adequate informal open space / green infrastructure, and the supporting text at para 3.24 explains that the provision of such green infrastructure "is of particular importance to address the potential impacts of increased visitor pressure on Natura 2000 sites, as identified in the HRA"; and "therefore, it will need to be ensured that the type of green infrastructure provided includes attractive, accessible greenspace that gives a credible alternative to visiting those sites". The proposal includes a significant element of informal open space, exceeding the requirement under policy EN3 in terms of scale; but it would need to be ensured that such provision was also of adequate quality.

Policy RL1 of the DMDPD sets out the requirements for formal recreation provision.

There is the conflict with policy BRU3 of the SADPD, as discussed above, but if the development achieved the delivery of part of the allocation that would be a factor in its favour.

Under JCS Policy 4 the requirement is for 33% affordable housing on sites of 16 dwellings or more (or sites over 0.6 ha) equating to 56 units.

Other policy requirements, such as DMDPD policy GC4 on Design and TS3 on highway safety, would also need to be met.
The policies in the Brundall Neighbourhood Plan are also significant, with the proposal potentially contributing to achieving the objectives behind policies 2, and 4. There is a possible conflict with Policy 3, but the layout of the development would seem to limit this by retaining the main view to the north-east from the identified viewpoint by the Memorial Hall.

In short, there is a clear and significant conflict with the development plan as the site is in the countryside, outside a defined Settlement Limit, and conflicts with policy BRU3; though this is tempered by other elements of the Development Plan, including the Neighbourhood Plan policies.

Other considerations
As referred to in para 11 of the NPPF, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. In policy terms a key consideration is the issue of housing supply.

Brundall is located within the Norwich Policy Area (comprising parts of Broadland, Norwich and South Norfolk) which is a distinct planning area for housing supply as set out in JCS Policy 4. The last Annual Monitoring Report for 2015/16, published January 2017, gives a housing supply figure for the NPA of 4.70 years as at 31 March 2016. Based on this, NPPF para 49 applies and relevant policies for the supply of housing should not be considered up-to-date. Further, housing applications should be considered in the context of the presumption in favour of sustainable development, as set out in NPPF para 14. This applies to the Neighbourhood Plan policies as well as to the Local Plan ones.

There has been considerable and often conflicting debate through the planning system and the courts over what is meant by “policies for the supply of housing” and there not being “up-to-date”. However, a decision of the Supreme Court has now provided greater clarity on the matter: (Suffolk Coastal DC (Appellant) v Hopkins Homes Ltd and another (Respondents) Richborough Estates Partnership LLP and another (Respondents) v Cheshire East Borough Council (Appellant) have now been decided (judgment given on 10 May 2017).

On my reading the Supreme Court determined that a “narrow” approach should be applied to determining what constitutes a policy for housing supply, and which would be classed as “out of date” if there was not a 5 year supply of housing land. Following on from this, I would suggest that policies that allocate land for housing or that define settlement limits (within which development would normally be located) should be classed as out-of-date if there is not a 5 year supply of housing land. As mentioned in my previous comments Brundall is within the Norwich Policy Area where there is currently 4.70 years supply. However, also following the court decision, other policies such as ones of environmental constraint, would not be regarded as out-of-date.

Also, the Court explained that national planning guidance (such as in the NPPF) is subordinate to legislation, such as the Town and Country Planning Act (Court decision para 75). The statutory development plan policies that are “out-of-date” are not removed by the NPPF paragraph 49. The plan policies “retain their statutory force, but the focus shifts to other material considerations. That is the point at which the wider view of the development plan policies has to be taken” (Court decision para 84). Further, “paragraph 49 merely prescribes how the relevant policies for the supply of housing are to be treated where the planning authority has failed to deliver the supply. The decision-maker must turn next to the general provisions in the second branch of paragraph 14. That takes as the starting point the presumption in favour of sustainable development, that being the “golden thread” that runs through the Framework in respect of both the drafting of plans and the making of
decisions on individual applications" (Court decision para 85). Also, such a "presumption" can be displaced on only two grounds: first, that "the adverse impacts of a grant of permission ....will "significantly and demonstrably" outweigh the benefits of the proposal", this being "assessed against the policies in the Framework taken as a whole"; and second, that "specific policies in the Framework ..... indicate that development should be restricted" (Court decision para 85), and that such specific policies "also mean the development plan policies to which the Framework refers" (Court decision para 85).

To put it simply, on my reading this means that the decision-maker should have regard to the Development Plan and the NPPF and give appropriate weight to the different elements, together with any other material considerations, and come to a balanced judgment.

In terms of this proposal, the shortfall in housing supply is a significant consideration which would weigh in favour of the application, with policies such as GC2 and the settlement limit being classed as out-of-date and so of reduced weight. Also, in its favour is that the proposal would bring forward a significant part of the allocation under policy BRU2, provided this is secured eg through an appropriate legal agreement. A similar factor in its favour is that the proposal would bring forward a significant area of informal open space, above the normal requirement under policy EN3, but again, provided it is secured. The relevant policies in the Brundall Neighbourhood Plan, with which the proposal has a considerable accord, should also be taken into account, weighing against the other "conflicting" elements of the Development Plan such as GC2 and BRU3.

Conclusion

There is a policy objection to the proposal in principle, being contrary to the Development Plan and the NPPF as discussed above, though this is tempered by elements of the Development Plan, such as the Neighbourhood Plan policies, in its favour. The current lack of a 5 year housing land supply is a significant material consideration that should be taken into account. However, this does not automatically outweigh the development plan. Other considerations, such as the provision of formal and informal recreational land are also material considerations that weigh in its favour. Together these could be seen as being sufficient to outweigh the conflict with the Development Plan.
planning

From: Drake, Richard <richard.drake@norfolk.gov.uk>
Sent: 25 August 2017 16:22
To: planning
Cc: Proctor, Andrew
Subject: RE: Land East of Memorial Hall, Brundall - 20171386 [ME-170825-573563]
Attachments: Mineral resources around Brundall.pdf; Response to land to the east of the Memorial Hall, Brundall 25-08-17.pdf

Good Afternoon
Please find attached the response by Norfolk County Council, in its capacity as the Mineral Planning Authority, to the above planning application.

If you have any queries please let me know.

Best regards
Richard

Richard Drake
Senior Planner
Minerals and Waste Policy (Planning Services) Environment and Planning Community and Environmental Services
01603 222349
E-mail: richard.drake@norfolk.gov.uk
Norfolk County Council
General enquiries: 0344 800 8020 or information@norfolk.gov.uk www.norfolk.gov.uk

-----Original Message-----
From: planning@broadland.gov.uk [mailto:planning@broadland.gov.uk]
Sent: 16 August 2017 11:25
To: Drake, Richard <richard.drake@norfolk.gov.uk>
Subject: Land East of Memorial Hall, Brundall - 20171386

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- Microsoft Word Viewer for Word attachments.
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Dear Mr Harriss

Re: land east of the Memorial Hall, Brundall (Hybrid) (Application 20171386)

This is a delegated response; and is made without prejudice.

The proposal site is partially underlain by an identified mineral resource (sand and gravel) which is safeguarded as part of the adopted Norfolk Minerals and Waste Core Strategy, and Core Strategy Policy CS16 ‘Safeguarding’ is applicable. Safeguarded mineral resources are derived primarily from the BGS Mineral resources map (2004) as amended by the DiGMapGB-50 dataset. A map showing the safeguarded resources is attached to this response.

A duty is placed upon Local Planning Authorities to ensure that mineral resources are not needlessly sterilised, as indicated in National Planning Policy Framework paragraph 143, and ‘A Guide to Mineral Safeguarding in England’ published jointly by DCLG and the BGS.

Paragraph 144 of the NPPF states that “When determining planning applications, local planning authorities should: not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes”.

Norfolk County Council as the Mineral Planning Authority for Norfolk have produced standing advice for the landowners, developers, agents and Local Planning Authorities regarding sand and gravel safeguarding. This can be found on the Norfolk County Council website at: http://www.norfolk.gov.uk/nmwdf on the ‘Adopted policy documents’ page.

The documents supporting the application do not include reference to the adopted Norfolk Minerals and Waste Core Strategy, which forms part of the development plan; or those parts of the NPPF which relate to mineral safeguarding. Therefore these requirements in relation to mineral safeguarding have not been assessed in the application.

Having established that Core Strategy Policy CS16 is applicable to this site, this would normally, as a minimum, require investigation into the mineral resources on site.

Continued...
Three trial pits have been dug as part of the Flood Risk Assessment and these identify sand and gravel deposits as occurring on the site. However, the information is limited and does not include Particle Size Distribution (PSD) testing. A more thorough site investigation, together with PSD testing and a mineral assessment to provide an estimate of the mineral resource quality and quantity, and the proportion that is likely to be workable prior to the proposed permanent development, is required.

If a viable mineral resource occurs on the site, the applicant should consider the use of a Materials Management Plan, to ascertain the quantities of aggregate which could be obtained from groundworks, sustainable drainage systems, etc, and then reused in the construction phase of the scheme. Assessment of the results of the PSD testing should refer to material class types in Table 6/1 of the Manual of Contract Documents for Highway Works: vol. 1: Specification for Highway Works Series 600, in order to identify potential suitability for use in the construction phases.

The County Council in its capacity as the Mineral Planning Authority (MPA) objects to the planning application (20171386) on this site unless:

1. the applicant carries out investigations/assessment including testing to confirm the viability of the resource for mineral extraction, and
2. if the mineral resource is proved to be viable, the applicant considers how it could be extracted economically prior to development taking place.

The documents supporting the planning application should be amended to include information on the presence of safeguarded mineral resources on site, and consideration of prior mineral extraction, with reference to the NPPF and the adopted Minerals and Waste Core Strategy.

There may be opportunities for the sand and gravel from on-site resources (such as groundworks) to be used in the construction phases of developments. This will improve the sustainability of the project by reducing the need to extract mineral from other locations, reducing the carbon cost of the project by reducing the quantity of aggregate needing to be transported to the site, reducing the quantities of material removed from the site as part of the groundworks operations, and ensuring that resources in other areas are not unnecessarily extracted, so that they can be available to sustain future growth. There are also opportunities on restoration for areas in which mineral has been extracted to form part of sustainable drainage systems, areas for landscaping, and/or renewable energy schemes, such as ground source heat pumps.

Norfolk County Council as the statutory authority for Mineral Planning in Norfolk wishes to be kept informed as this proposal is progressed through the application process.

Conclusion
Norfolk County Council objects to the application 20171386 on the grounds of mineral resource safeguarding. This is in its capacity as the Statutory Authority for mineral planning in Norfolk.
The Mineral Planning Authority would welcome discussion, with Broadland District Council and/or the applicants, if there are any queries regarding the requirements necessary to address the issues raised in this response. The applicants should have regard to Norfolk County Council’s published Minerals Safeguarding Guidance.

If you have any queries regarding this response please contact Richard Drake (Senior Planner, Minerals and Waste Policy) by email at richard.drake@norfolk.gov.uk or telephone 01603 222349.

Yours Sincerely

Caroline Jeffery
Principal Planner (Minerals and Waste Policy)
Hi Kate, yes the extension as requested is fine.

Nigel Harriss
Area Planning Manager (East)
Broadland District Council

Tel: 01603 430529
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 following the approval of planning permission. The fees will be £28 per request for householder applications and £97 per request in all other cases and will subsequently be increased in line with the National Fee Structure.

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Nigel

Kate Ginn phoned from Natural England, they would like an extension of time to comment until the 15 September. Her email address is kate.ginn@naturalengland.org.uk

Regards

Jayne Owen
Senior Planning Officer
Broadland District Council

Tel: 01603 430628
www.broadland.gov.uk
jayne.owen@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 following the approval of planning.
Nigel

I have provided some estimated figures for play, sport, allotts and GI to John for your negotiations. As you know there is a big shortage of formal recreational space in Brundall in particular these development proposals will not fill that gap.
Dwelling Boundaries: The plans also show details of intended treatments to clarify private and public areas, although I am not aware of exact heights indicated for some of the fence boundaries within the information provided. Therefore to reiterate from a point of crime prevention:

- It is desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept (maximum height 1 metre).
- The side & rear gardens need more robust defensive barriers by using walls, hedges or fencing to a minimum height of 1.8m.
- Sub-divisional boundary treatment between gardens should prevent unauthorised access and comprise of similar treatments, which could be 1.5m to enable a good degree of beneficial natural surveillance to take place across the gardens.
- Side gates must be lockable.

NB/ Not able to decipher from current plans rear access point for plots # 21 & 22, nor front access for # 20.

Parking: There is good provision of en-curtilage parking in the plan which is commended by SBD Homes 2016. Residents should be given an unrestricted view over their vehicles, therefore gable end walls which are adjacent to parking should be provided with ('active room') window surveillance to enable occupants a chance to see who is visiting/deter criminal activity.

- Please consider side elevations of Plots # 13, 18 & 20
- Also consider replacing part of rear boundary for plot #4 with trellis topping to assist surveillance of garages positioned at rear of the plot.

Further general points:

The attack standard of accessible doors and windows are now met by building regulations ADQ document. Such standards and products have a proven track record in defeating known criminal methods of committing crime. Across the development, vehicle access doorsets to garages should reflect LPS 1175 SR1 attack resistant standards and for the same attack resistance benefit I would encourage all garage pedestrian doors (and windows) be fitted with PAS 24 attack resistant products.

Vandal resistant ‘dusk to dawn’ sensored security lighting to the front and rear of properties is an essential safety and security feature. Ideally they would also cover in curtilage parking and nearby parking bays. These remain essential to ensure residents can see who is visiting, provide important light cover for their own security and safety and criminal activity deterred or identified early. Lighting to reduce the effects of criminality should reflect the specifications found in Secured by Design, Homes 2016 guidance.

Please do not hesitate to contact me to discuss the contents of this letter further.

Yours sincerely

Penny Turner
Architectural Liaison Officer
Norfolk Constabulary

We will answer letters within 10 working days, where information is available. Where this is not possible, an explanation will be given for any delay.
Mr N Harriss  
Case Officer, Planning  
Broadland District Council  
(via email)  

Application Ref: 20171386  
Our Ref: CPO 6586/17  
Date: 18th August 2017  

Dear Mr Harriss,

Re: Land east of Memorial Hall, Brundall; Hybrid Application - Outline Planning application with the exception of Phase I for which details of all matters in relation to the 23 Dwellings.

Thank you for your email inviting comments on the above application. My role as the Architectural Liaison Officer is to give advice on behalf of Norfolk Constabulary in relation to the layout, environmental design and the physical security of buildings, based upon the established principles of ‘Designing out Crime’.

Further to my previous comments, I am encouraged to see the D&A Statement’s references to the principles of Crime Prevention through Environmental Design (CPTED) and security measures recommended in Secure by Design Homes 2016 Guidance.

Layout:

Vehicular and pedestrian routes appear to be visually open and direct. Where possible the orientation of the houses displays ‘active frontage’ (allowing neighbours to easily view their surroundings) and promotes a ‘back to back’ garden layout which assists in securing the more vulnerable rear of the properties. The plans have incorporated a mix of dwellings, enabling greater potential for homes to be occupied throughout the day, giving increased opportunity for natural surveillance and community interaction.

In terms of open space and landscaping, I recommend general vegetation should not exceed 1m in height and trees be of columnar habit (be trimmed below 2m) to enable best surveillance opportunities to take place, all of which I believe is proposed in the plans.
Hi Nigel, hope all is well.

Re: Land east of Memorial Hall, Brundall; Hybrid Application - Outline Planning application with the exception of Phase 1 for which details of all matters in relation to the 23 Dwellings.

Please find attached my comments on the above application.

Kind regards, Penny
Nigel Harriss

From: Brundall Parish <brundallparishcouncil@hotmail.co.uk>
Sent: 17 August 2017 10:34
To: Nigel Harriss
Cc: Phil Courtier
Subject: Fw: Land East of Memorial Hall, Brundall - 20171386
Attachments: Consultation Letter (Parish Council EMAIL)_931356.PDF

Dear Nigel,

We have today received the covering letter from Phil detailing planning application number 20171386. I note that the application documents are all now online. Unfortunately the timing of this was unfortunate because I issued the Agenda on Tuesday and with having taken my day off yesterday came back to find the emailed covering letter detailing that comments must be received by 5th September.

The Council is asking for an extension to comment after it has held its Parish Council Meeting on 25th September. As you will appreciate Councillors will need time to go over the 76 documents online in order to make a fair and reasoned comment.

We hope that you will find this acceptable as this has now missed our Agenda for 21st August.

Best Wishes
Sharon Smyth
Parish Clerk
Brundall Parish Council
Tel. 07809 144342
www.brundallpc.norfolkparishes.gov.uk
email: brundallparishcouncil@hotmail.co.uk

From: planning@broadland.gov.uk <planning@broadland.gov.uk>
Sent: 16 August 2017 10:25
To: brundallparishcouncil@hotmail.co.uk
Subject: Land East of Memorial Hall, Brundall - 20171386

You have received this email from Broadland District Council (Planning Service) in relation to a planning matter at Land East of Memorial Hall, Brundall.

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