

**Reference:** 06/13/0652/O

**Parish:** Bradwell

**Officer:** Mr D.Minns

**Expiry Date:** 17-03-2014

**Applicant:** Persimmon Homes

**Proposal:**

- 1) Full Planning Permission for Phase 1 of Residential Development (150) dwellings
- 2) Outline Planning permission for 700 dwellings, commercial mixed use ; consisting of B1,B2 and B8 uses, local centre to include A1-A-5, B1 and D1 and other community uses; primary school and open space.

**Site:** Wheatcroft Farm, Bradwell Great Yarmouth (Land at South Bradwell)

**REPORT**

**1. The Proposal**

1.1 The proposal is in the form of a hybrid planning application for up to 850 residential dwellings, a new link road between the A143 and Beacon Park, a neighbourhood centre, primary school, employment land and other associated uses. The total application site area is 56.5 hectares (139 acres).

1.2 Full planning permission is being sought for Phase 1 of the residential development (8.3ha) including: 150 dwellings; open space (3,000sq.m); a new junction onto the A143; the first section of new Link Road, including the first roundabout; and associated estate roads and other infrastructure works.

1.3 Outline planning permission (48.2ha or 119 acres) with all matters reserved for up to 700 dwellings. This element of the hybrid application includes: 10.36 ha (25 acres) of commercial mixed use area (including B1,B2,B8 uses); a local centre (up to 1600 sq m to include A1-A5, B1,D1 & other community uses); primary school and open space.

1.4 The scheme will primarily provide a mix of 2, 3 and 4 bedroom family housing and a limited number of single storey dwellings.

1.5 In parallel with this planning application, Norfolk County Council has submitted and is soon to determine a full planning application for the Link Road between the A143, through to the existing Beacon Park development linking to the recently approved roundabout associated with the Sainsbury development and road to

Beaufort Way to link with the A12, incorporating the junction and first section of road as proposed in this planning application.

1.7 Whilst the A12/A143 Great Yarmouth Link Road application is being submitted separately, it is proposed in conjunction with this residential and employment planning application. The road is being funded through the Government's 'Pinch Point' initiative, with local contributions, including from the residential and employment developer and the landowner. This funding will additionally help to unlock potential for new development as well as improving traffic flow.

1.8 The planning application for the Link Road and for the residential and employment development share the same junction onto the A143 and road alignment through the site. The detailed plans and supporting information in relation to the road and junctions are common to both applications, although the Norfolk County Council Link Road application includes the full link to the existing Beacon Park access road.

1.9 The expectation is that the full Link Road will be delivered to a fast track timetable and should be constructed by March 2015 to secure the Government funding (which represents 70% of the full construction costs). The duplication of the (first section) road application within the residential and employment outline application is a consequence of the requirement for the residential/employment scheme to show a means of access to the public highway, which until the full Link Road is constructed, will be from the A143 Beccles Road.

1.10 The Borough Council considers the proposal to constitute (Environmental Impact Assessment development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011(EIA) being an Urban Development project and as such an Environment Statement is required. The purpose of the Environmental Assessment is to identify likely potential significant environmental effects in order that the development proposals can be modified to avoid them, or appropriate mitigation measures identified to ameliorate the effects.

1.11 In accordance with the EIA regulations and best practice guidance, a scoping exercise was undertaken to assess the scope of the of the required EIA and to identify the likely significant environmental effects of the development which needed to be covered by the Environment Statement to be submitted with the associated planning applications. This was informed by a number of technical studies (using Borough Council background papers to the Core Strategy and others prepared by the applicant). The Borough Council then provided a scoping opinion following consultation with internal and external consultees.

1.12 The scoping opinion concluded that the proposed development project was likely to give rise to significant environmental effects on the following environmental aspects which needed addressing in the Environmental Statement:

- Agricultural Land Quality;
- Air Quality;
- Archaeology;

- Climate Change and Renewable Energy;
- Ecology;
- Flood Risk, Drainage and Water Resources;
- Landscape and Visual Impact ;
- Noise;
- Socio economic factors;
- Transport; and
- Utility Infrastructure.

1.13 The Environmental Statement submitted with the applications addresses these issues and will be dealt with later in this report.

1.14 In addition, the applicants have submitted a Design and Access Statement, Planning Statement and a Statement of Community Involvement following presentations to Bradwell Parish Council and local public consultation in September 2013.

1.15 Plans submitted with the application include detailed plans for the 150 dwellings (for full planning permission) and an indicative master plan for the outline application.

1.16 The outline proposals comprise:

- A1 (shops) – 700 sq.m. ;
- A2 (financial and professional services) – 300 sq. m. ;
- A3 (restaurants and cafes) – 160 sq. m. ;
- A5 (hot food takeaways) – 140 sq. m.
- B1a (offices other than A2), B1b (research and development) & B1c (light industrial) – 15,400 sq. m. ;
- B2 (general industrial) – 19,400 sq. m. ;
- B8 (storage and distribution) – 3,900 sq. m. ; and
- D1 (non-residential and other community uses) – 300 sq. m.<sup>1</sup>

## **2. Planning Background**

2.1 The Great Yarmouth Borough Wide Local Plan 2001 in supporting text to Policy TCM2 identified an ambition for a A143 South Bradwell Development Area Access Road but acknowledges that this was not included in any road programme at the time. It states that the access road is required to serve a proposed new residential development area in South Gorleston and that as a long term proposal (beyond 2006) it may eventually be of benefit to eventually create a link between the A143 and A12. However at that stage it was not proposed to create a link as part of the South Gorleston Development Area or part of the policy provision in the plan.

2.2 Notwithstanding this, Policy TCM2 refers to requesting the Highway authority to identify and protect alignments for access roads running westwards from the western

---

<sup>1</sup> According to the planning application forms

boundary of the South Gorleston Business Park to the A143 at Bradwell and shows an indicative route within the Bradwell and Gorleston Proposals map accompanying the local plan. Policy TCM2 remains a 'saved policy' in the local plan.

2.3 The site subject of the planning applications forming this proposal is located on land identified as a key strategic site in the draft Core Strategy as submitted to the Planning Inspectorate.

2.4 Members should also be aware an outline planning permission has approved by Planning Committee for 28 dwellings under 06/13/0703/0 (subject to legal agreement) immediately adjacent to the northern boundary of the site. In addition an outline planning application has been submitted for 130 dwellings to the north eastern boundary of the site but this is yet to be determined.

2.5 This proposal has come forward ahead of the adoption of the draft Core Strategy and other new Local Plan documents because the Council needs to secure the link road to government deadlines in order to achieve the 70% funding.

#### *Site Context*

2.6 The site lies between the A143 Beccles Road, Bradwell and Woodfarm Lane, Gorleston. Bradwell is located to the north-east and Gorleston is located to the east. James Paget Hospital lies due east of the site.

2.7 To the south west of the site is the village of Browston Green which includes the Browston Hotel and golf course. The village of Belton is located to the north west of the site. There are some dwellings associated with Hobland Hall and Hobland Road which lie south of the site.

2.8 Wheatcroft Farm and cottages lie on the southern edge of the proposal site. Land levels range from 8-13m AOD. There is a ridge of land approximately 12-13m AOD that runs south east to north west across the site. The site slopes away from the central ridge towards the north east and south west. There are no drainage ditches on the site.

2.9 Woodfarm Lane runs from Beacon Park and joins into Oriel Avenue at the eastern part of the site. Browston Lane runs across the western point of the site from the A143 to Browston Lane. (This is to be diverted as part of the new road proposals.)

2.10 There are two public bridleways running into or past the site. Bradwell Bridleway 7 (Jews Lane) runs along the eastern boundary of this proposed development and Bridleway BR10 (Clay Lane) runs through the centre of the site. Both are already popular routes for walking, cycling and horse-riding.

2.11 There is existing residential development along parts of the northern boundary of the site.

### 3. Consultations

**3.1 Parish Council - Bradwell** – No overall objection to plans as submitted. However, they have made the following comments regarding the proposal.

1) Regarding proposal 1), 'Full planning permission for 150 houses', would submit that this 'Phase 1' of residential development has too high a proportion of the overall numbers of terraced housing units proposed, compared with those proposed for the remaining 'phases';

2) Would submit (see drawing no SL01) that the proposed 'full' housing development area as a whole is poorly landscaped - although a fairly large number of trees and some hedging is shown on the drawing, these are mostly proposed as part of the associated 'link road' application. It appears that virtually no grass verges or other vegetation are proposed for the residential roads, and that the 'front gardens' of many of the dwellings are too small, and will allow little more than a concrete slab for parking a car.

3) Would raise concerns regarding the 'privacy' of many of the proposed dwellings - it appears that only a 1.2m fence will be erected between properties, and that e.g. unit 96 would be able to see all the way to unit 75's back window;

4) Would submit that the garages proposed are too small to accommodate many types of modern vehicle, and allow insufficient room e.g. to change a flat tyre;

5) It appears that, where pedestrian footways are proposed, these may in some places need to be 'colour coded', to avoid confusion with adjoining concreted areas of private property and in particular that pedestrian footways which allow room for prams, pushchairs, wheelchairs, scooters etc. should be clearly 'colour coded';

6) It appears that the 'type 6' roads (see drawing no SL01) have no adjoining pedestrian footways proposed. Would therefore submit that footpaths leading to the 'public open space' area from these 'type 6' roads should be installed as necessary, so that children wishing to walk to the 'public open space' do not have to walk on the roads;

7) The 'public open space' area should be provided with children's play area facilities, suitable for all ages up to 16, and seats should also be provided;

8) Would question why 'swales' are proposed for properties on the side of the site comprising unit 13 and units 31-39, but not e.g. units 36 and 37, parts of 35 and 38, and plot 40 onwards. Would further question why the 'swales' proposed for units 38 and 39, unlike the others, appear to propose a 1.8m border fence in the middle of the properties' gardens?

9) Would suggest that the proposed 'emergency link' road should have suitable isolation gates when not in use;

10) Would point out that drawing no S522800088-109 incorrectly shows 'Clay Lane footpath' at the 'south' end of the plan - incorrect because firstly 'Clay Lane' has become 'Hobland Lane' at this point, and secondly because both Clay Lane' and 'Hobland Lane' are registered public bridleways, not 'footpaths'. A 'bridleway' is defined as 'a right of way on foot or horseback (or leading a horse) and a right to ride bicycles- providing no local by-laws or Traffic Regulations prohibit it. The Clay Lane public bridleway is shown by Norfolk County Council as having a width of approximately 10 feet, and the Hobland Lane public bridleway is shown as having a width of approximately 12 feet, and it should be borne in mind that this area is one of the last safe places for children to ride horses in Bradwell. The Parish Council would therefore resist any attempt to 'downgrade' these bridleways to 'footpath' status, or for the proposed development to be allowed to erode any areas of these bridleways (please see attached for further details);

11) Drawing no S522800088-109 also incorrectly omits the 'Marbury' property on Clay Lane (situated behind the other houses), even though the property is shown on other drawings;

12) Also further to 10) above, drawing OAS 1401-TSO5, 'tree protection plan, phase 1', indicates, in a number of places, 'existing hedge or vegetation group to be removed' - including a hedge on Clay Lane, which starts immediately beyond the houses, if travelling from Beccles Road. The Hedgerow Regulations 1997 (SI no. 1160) place restrictions on removal of most countryside hedgerows, and carry a 'strong presumption' that 'important hedgerows will be protected'. This hedgerow is hundreds of years old, and the council would therefore submit that it should be deemed as 'important' within the context of this legislation and that permission for its removal should be refused accordingly;

13) Would object to the proposals to restrict access between the link road and Browston Lane, and would ask that a 'mini-roundabout' should replace the proposed new left-in left- out priority junction and new central median;

14) Would object to the absence of 'lay-bys' on the link road which would allow buses to safely pull off the carriageway at stops;

15) Would question the 'darker brown' rectangle shown on drawing SL01 on part of Browston Lane -does this represent a proposal for a 'speed bump'?

### **3.2 Neighbours/Article 13 Advert:**

- A number of representations request that bungalows should replace houses at Browston Corner on the land between Browston Lane and Beccles Road ;
- Objection to the level of new housing proposed;
- Objection to the use of greenfield land which will result in agricultural land being lost forever;

- Detrimental impact on the residential amenities associated with existing dwellings in Meadowland Drive and Carraway Drive caused by additional through traffic;
- Overshadowing and detriment to residential amenity of residents at 'Marbury' in Clay Lane due to the proximity of the new dwellings to their boundary – residents also request a close-boarded fence to the south side of the hedge to secure privacy and security;
- New plans omit the grass verge and the service road;

**3.3 Highways Agency** – Holding direction until 30 April 2014 (recently withdrawn) I can confirm that I am now content with wording of suitable planning conditions that ensure delivery of highway improvements to the A12 trunk road as part of the Strategic Road Network in Great Yarmouth.

Conditions:-

- 1 No more than 150 dwellings of the permitted development shall be occupied unless and until the proposed A143-A12 link road proposed under Norfolk County Council Planning application reference Y/6/2013/6006 and shown indicatively on drawing No. MMD-326968-D-DR-00-XX-0103 dated October 2013 titled Land Ownership Plan produced by Matt MacDonald for Norfolk County Council has been constructed and is open to traffic and certified as such in writing by the planning authority in consultation with Norfolk County Council as the highway authority.
- 2 No more than 100 dwellings of the permitted development shall be occupied unless and until MOVA traffic signal control has been installed at the traffic signal junction of James Paget hospital /A12/Kennedy Avenue junction, is operational and open to traffic and certified as such in writing by the planning authority in consultation with the Highways Agency and Norfolk County Council as highway authorities.  
  
Informative: - Whilst implementing the MOVA control at this junction it would be helpful to the operation of the junction and the Highways Agency if an additional phase for northbound right turning traffic into Kennedy Avenue could be included in the design for the signal controller
- 3 No more than 50 dwellings of the permitted development shall be occupied unless and until a traffic signal installation design has been approved for the junction of Beaufort Way/A12 roundabout junction. The junction design should be similar to that shown indicatively on drawing No. 3761/15/16 Rev A (23/01/07) dated 26 October 2006 Produced by Millard Associates for Gt Yarmouth Borough Council titled Improved Signalised Roundabout With Widened Approaches. The indicative design

will require further amendment to fully operate in a satisfactory manner. The design shall be approved by the planning authority in writing following consultation with the Highways Agency and Norfolk County Council highway authorities.

- 4 No more than 150 dwellings of the permitted development shall be occupied unless and until the approved design in 3 above has been constructed and is operational and open to traffic and certified as such by the planning authority in consultation with the Highways Agency and Norfolk County Council as highway authorities.

In consideration of the above I am now able to confirm that the Highway Agency now raise no objection to the application and attach a TR110 reflecting the current situation which supersedes that dated 30 April 2014.'

### **3.4 Norfolk County Council**

**Highways** –The development is proposed to be served off the new A143/A12 Link Road which will be part funded by this development. Much of the traffic impact of this development will be mitigated by the new Link Road. However there is expected to be additional impacts at the Beccles Road/Church Lane/Long Lane/Mill Road junction where it is proposed to up-grade the traffic signal controller with MOVA, CCTV cameras and detection loops to enable SCOOT congestion monitoring and communications for remote monitoring to improve the performance of this junction. The development will have a Travel Plan to make the site a sustainable as possible the funding for which will be secured by a S106 agreement. Bus service provision is secured by condition.

In the light of the above the Highway Authority recommends no objection subject to the above mentioned S106 being completed and the following conditions being placed on any permission granted:-

The Highway Authority recommends no objection subject to conditions suggested in the consultation letter and completion of Section 106 Agreement securing a Travel Plan bond and monitoring fees.'

#### **Norfolk Fire and Rescue Service –**

##### *Residential element:*

The first phase (150 dwellings) will require 3 fire hydrants on no less than a 90mm main at a cost of £424 each (Essex and Suffolk Water Authority). The remaining outline scheme would require based on 700 dwellings 14 additional fire hydrants on no less than a 90mm main at a cost of £424 each (Essex and Suffolk Water Authority)

##### *Employment area:*

With reference to the above re- development, based on the location, infrastructure already in place we will require 2 fire hydrants on a minimum 150mm main at a cost of £473:00 each. They should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development and should comply with Building Regulations and approved document B (Volume 2 -Buildings other than Dwelling houses) section B5

#### *Primary school:*

An additional fire hydrant will be required to be installed capable of delivering a minimum of 20L of water per second. At a cost of £473:00

No development shall commence on site until a scheme has been submitted for the provision of the fire hydrant on the development in a location agreed with the Council in consultation with Norfolk Fire and Rescue Service and should meet the requirements of Building Regulations Approved Document B Volume 2 Sections 15 &16 (Fire Hydrants/Water Supplies and Vehicle Access).

#### ***Library Provision -***

£60 required per dwelling contribution towards library service provision.

#### ***Environment -***

My suggestions for the proposed development would be for the improvement of the surface of Jews Lane along its full length, a public bridleway to the east of the development, which also is a route to the rear entrance of the high school. The type of improvement would not be for a tarmac surface but a stone surface that would still be suitable for its public bridleway status.

To improve the access for horse riders in the area, a new bridle link between the two existing bridleways - Jews Lane on the east of the site and Clay Lane which bisects the site, would be of benefit to all users, a bridleway being able to be used by horses, cyclists and pedestrians.

Future maintenance of biodiversity areas should also be considered. A commuted sum may be required where appropriate to cover the future maintenance of existing and new areas habitat. These may require different management to the standard landscaped areas.

***Archaeology*** - The proposed development site lies within a complex multi-period archaeological landscape known from crop mark evidence and fieldwalking/metal detected artefacts spanning the late prehistoric period to the Second World War.

A two-stage archaeological evaluation (comprising fieldwalking and geophysical survey) carried out across the proposed development area has confirmed the presence a number of heritage assets with archaeological interest at the site including ring ditches likely to relate to Bronze Age barrows, undated enclosures,

boundary ditches and a Second World War HFDF station. However, other possible archaeological features previously identified at the site as crop marks were not clearly identified by the geophysical survey suggesting that this technique did not provide a complete assessment of the buried archaeological remains present on this occasion. Consequently, in addition to the known heritage assets at the site, there is also potential that previously unidentified heritage assets with archaeological interest will be present at the site and that the significance these (both known and as yet to be identified) will be adversely affected by the proposed development.

If planning permission is granted, we therefore ask that this be subject to a programme of archaeological work in accordance with National Planning Policy Framework para. 135. We suggest that the following conditions are imposed:-

A) No development shall take place on Phase 1 until an archaeological written scheme of investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and

- 1) The programme and methodology of site investigation and recording,
  - 2) The programme for post investigation assessment,
  - 3) Provision to be made for analysis of the site investigation and recording,
  - 4) Provision to be made for publication and dissemination of the analysis and records of the site investigation,
  - 5) Provision to be made for archive deposition of the analysis and records of the site investigation;
  - 6) Nomination of a competent person or persons/organization to undertake the works set out within the written scheme of investigation and,
- B) No development shall take place on Phase 1 other than in accordance with the written scheme of investigation approved under Condition A
- C) Phase 1 of the development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the archaeological written report

**Crime Prevention Architectural Liaison Officer** – no response

**Norfolk County Council Public Rights of Way Officer** - Bradwell Bridleway 7 (Jews Lane) runs along the eastern boundary of this proposed development and Bridleway BR10 (Clay Lane) runs through the centre of the site. Both are already popular routes for walking, cycling and horse-riding, the presence of the new development will likely increase the usage of the route and therefore the expectation that the route surface will be more akin to that of the development footways.

The developer could offer improvements to the surface of the bridleways to meet this raised expectation, in the form of a non-sealed surface that would be suitable for horses. A commuted sum for the continued maintenance of this improved bridleway surface would be requested. Alternatively both routes could become adopted highway; however, bridleway use would need to be included in any adoption plans. The plans show that there are no formal links from the development onto the bridleways.

This means that residents will have to walk/cycle a considerable circuitous distance along other estate roads just to access the bridleways. There are many opportunities for including links, but these will need to meet with the adopted highway and have a public status of their own (either PROW or adopted) to ensure continuity of the public network.

An off road bridle link between BR10 and BR7 (Clay Lane and Jews Lane) would be desirable to increase the connectivity of the bridleway network. BR10 will be severed by the link road and an unsealed link along this road for horses has been suggested in that application response. The continuation of a bridle link through the new development to Jews Lane, which could be used by walkers, cyclists and horse riders, would be welcomed and provide a safe alternative for all users.

The design and access statement discusses the boundary trees and states that detailed proposals will 'seek to retain and enhance any existing boundary trees and hedgerows'. The ownership of the boundary feature of the bridleway will therefore need to be established in regard to the responsibility of future maintenance of this feature.

## **Education**

There is capacity in Nursery Places (3-5) =50 places  
Ormiston (11-16 ) + 309 spaces  
Lynne Grove VA + 28 Places

Further comments on the primary school situation is reproduced below.

### ***Norfolk Education – BRIEFING NOTE ON CHILDREN'S SERVICES POSITION REGARDING EDUCATION PROVISION IN BRADWELL.***

#### **1. Background**

There are three catchment Primary phase schools that serve Bradwell; Hillside Primary School (a 210 place Community School), Woodlands Primary Academy (a 420 place school sponsored by Lynn Grove Academy) and Bradwell Homefield CE VC Primary School (a 210 place Church of England Voluntary Controlled school) – (see Map attached).

All three of these schools are full, or close to being full, and are showing pressure for places in their lower year groups (see schedule of comments sent to Great Yarmouth Borough Council January 2014). There is possibly scope to expand Hillside Primary School to a 420 place school as the school occupies a fairly large site. However, an expansion of that size would not be adequate to accommodate all the children from the proposed developments around South Bradwell. The two current applications (980 dwellings) will generate 254 primary aged children (5-11) and there is further potential for primary school numbers to increase as other development/s come forward in the area.

With the location of these existing schools, mainly to the North/West of Bradwell and the other side of the main A143 road to the proposed developments (see map attached ), it is considered appropriate to provide a new school for local children within the development itself.

## **2. Current position**

3. Before the decision was made that a new school was the best option, Children's Services felt it appropriate to consider other schools in the locality, in particular Ormiston Herman Academy which although is not the 'catchment' school and is actually located in Gorleston, it is the closest school to the proposed developments.

Herman became an Academy under the Ormiston Trust in January 2014 and in doing so it became its own admissions authority and the County Council has no powers over the establishment of their admission numbers.

Ormiston Herman Academy has an admission number of 54 (ie.the school admits up to 54 children in each year group) and a capacity of 378 places. In November 2013 Herman was judged by Ofsted as "Good" and we believe this has resulted in more children applying for places at Herman for the Sept 2014 intake year (43 compared to 32 in 2013). The County Council must plan for an overall increase in numbers at Herman over the next few years.

Herman has 86 children for 54 places within their catchment boundary in their current reception year. Over the past few years the County Council have identified that there is considerable movement of children between Herman, Cliff Park Infant School and Peterhouse Primary School (see Map attached). Investigating pupil number across these three schools shows that there are 68 pupils in Cliff Park catchment for 90 places, 36 children in Peterhouse Primary catchment for 45 places and 86 children in Herman catchment for 54 places. These figures total to 190 children for 189 places. This is evidence that there existing children in the wider area are sufficient to fill these schools, in particular Herman to their planned capacity.

Moreover Pupil forecasts for these 3 schools shows a similar pattern in the future with sustainable pupil numbers to keep these three schools to capacity without any further housing being considered.

## **4. County Council requirements**

Although 124 unfilled places are identified at Herman for the 2013/14 academic year, with the evidence provided above that this trend will not continue and the school will continue to take more children in the future. Norfolk County Council Children's Services cannot consider gifting these unfilled places to a development that is unlikely to generate any considerable numbers of children until at least 2017/18.

Children's Services' preferred planning option is for the new development to provide a new 1 Form Entry (1 FE) primary school (210 places) which could be expanded in time if required to a 1.5 FE (315 places). As such a site of 1 ha is sought free of

charge for a 1 FE school and a reserve site of 0.5 ha sought which the County Council would agree to purchase should it be required.

## **5. Alternative Option**

There would be a significant risk of accommodating all the children coming forward from this development if a new school is not constructed given the scale of planned development (850 from this application alone) (i.e. 220 children).

The alternative strategy would be to expand existing schools, where this is possible and where these schools which are their own Admissions Authority are willing to go down this route. This would potentially give rise to the following local community issues:

- (a) Provision of practicable routes to school – this could prove difficult as any routes will involve the crossing of busy roads; and
- (b) Wider sustainability issues – it is likely that many children would be driven to school thus leading to more road-based movement.

## **6. Conclusion**

The County Council considers that there is a demonstrable need for a new primary sector school site as part of the major proposed strategic development in this area. Such a claim is fully consistent with claims made for other similar sites of this scale in the County. The size of school in the first instance should be a 1 FE with the potential to expand to a 1.5 FE. The County Council recognise the wider strategic importance of delivering this and other sites in the area and would accept the standard adopted cost multipliers to be used to calculate the financial requirements on this site (i.e. 220 places x £11,644 [cost multiplier per child place] which equals £2,561,680)

### **3.5 Environment Agency – to be updated verbally**

It has been confirmed that sandy soils are present below the clay soils in the central band so infiltration will be viable for the basins in phases 2, 3a and 4a. The infiltration rates used in the calculations have been revised with a slightly lower rate of 1.9 x 10A-5 m/s as a more precautionary measure. These show that the basins have been adequately sized to contain the surface water based on these lower infiltration rates.

This satisfies our concerns with the surface water drainage strategy for Phases 2, 3a, and 4.

We still have concerns regarding the surface water drainage strategy and proposed development layout for Phases 5 and 6, where the basins are proposed to be sited in the area of surface water flood risk in the Great Yarmouth SWMP.

We consider that the SWMP modelling is the best and most accurate information on surface water flood risk in the area, as detailed modelling was undertaken as part of

the SWMP to determine the surface water flood risk maps for the Bradwell area. The SWMP identifies the area shown at risk of flooding in the east of the South Bradwell development as a 'designated overland flow path' which must be kept unobstructed.

Since our previous response, we have been consulted on the draft 'Flood Risk Sequential and Exception Test Assessment in support of the Great Yarmouth Borough Core Strategy' dated January 2014. This supports the findings of the SWMP and includes the following draft policy regarding the South Bradwell site:

'The site has been subject to detailed modelling in the Surface Water Management Plan (SWMP) and it is within the Bradwell Critical Drainage Area. The eastern edges of the site plus smaller discrete areas to west are at risk in the 1 in 100 year scenario which covers approximately 5-20 % of the site. The options assessment has identified this area along the eastern edge of the site as a designated overland flow route. Any site layouts will need to avoid developing areas at risk of surface water flooding for more and less vulnerable uses. In addition a reduction in surface water runoff rates and flood resilient construction needs to be considered along with retention of overland flow paths to improve flood risk management as set out in the SWMP.'

Therefore the proposed development layout is clearly in conflict with the draft Great Yarmouth Sequential Test policy and the draft Great Yarmouth SWMP by locating development within the designated overland flow route. The proposed houses and basin, and all built development, should be removed from the area shown to be at risk in the SWMP, and the area maintained as a designated overland flow route. We object unless this amendment to the site layout is made.

A further verbal update will take place at Planning Committee on the Environment Agency's response to revised plans to address this last comment.

**3.6 Anglian Water** – In documentation submitted with the application Anglian Water confirmed that the existing sewage system has sufficient capacity to accommodate the development. No response received to the formal consultation .

**3.7 Essex and Suffolk Water-** We have no objection to the proposed development. Consent to this development on the condition that water mains are laid in the highway on the site, and that the water service is made onto our company network for each new dwelling, for revenue purposes.

### **3.8 Natural England**

Natural England has made two responses concerning these applications.

First Response:

*Objection/Further information required*

Natural England has some concerns regarding the detail of the above application, particularly with regards to consideration of cumulative recreational disturbance impacts upon internationally designated sites as detailed below. We are confident that it should be possible to ensure any impacts can be appropriately avoided or mitigated, however without further information it is the advice of Natural England that **it is not possible** to conclude that the proposal is unlikely to result in significant effects on the European sites in question.

Conservation of Habitats and Species Regulations 2010 Wildlife and Countryside Act 1981 (as amended) Internationally and Nationally Designated Sites. The application site is in close proximity to a European designated site (also commonly referred to as Natura 2000 sites), and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations'). The application site is in approximately 3.2km from Breydon Water Special Protection Area (SPA), 3.9km from Broadland SPA. Breydon Water is also listed as a Ramsar site<sup>1</sup> and notified at a national level as a Site of Special Scientific Interest (SSSI). Broadland is also a Ramsar site, and listed as The Broads Special Area of Conservation (SAC) and is notified at this location at a national level as Halvergate Marshes Site of Special Scientific Interest (SSSI). The notification features of the SSSIs broadly relate to the features associated with the internationally designated sites and so the following comments are applicable in both an international and national context. Given the size of this application, which has to be considered to equate to approximately 2000 new residents, Natural England believes that this application had potential to influence a wider network of designated sites including Great Yarmouth North Denes SPA and SSSI and Winterton - Horsey Dunes SAC both alone and in combination.

In considering the European site interest, 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 have. The Conservation objectives for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

#### Habitats Regulation screening

Natural England notes that an HRA has not been produced by your authority, but rather, has been provided by the applicant. As competent authority, it is your responsibility to produce the HRA. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

On the basis of information provided, Natural England advises that there is currently not enough information to rule out the likelihood of significant effects. Natural England therefore advises that your authority **should not grant planning permission** at this stage.

Uncertainties remain relating to effects that may become significant when considered in combination with other plans or projects.

Natural England advises that the assessment currently does not provide enough information and/or certainty to justify the assessment conclusion. We advise that the information and evidence gaps could potentially be resolved with additional information formally submitted by the applicant in order to amend the proposal. This would then provide an opportunity for your authority to repeat your screening to check for the likelihood of significant effects of the project as submitted (i.e. with all new information provided as part of the proposal).

The information produced by the applicant as part of the ES includes a brief screening assessment under the provisions of the Habitats Regulations, to check for the likelihood of significant effects.

This assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. This conclusion has been drawn having regard for the measures built into the proposal that seek to avoid all potential impacts. Natural England **disagrees with this conclusion and has the following advice:**

Natural England is satisfied that there are unlikely to be significant impacts on the above internationally designated sites as a result the construction phase however we are not confident that a thorough assessment of operational phase impacts has been made.

It is our view that Great Yarmouth Borough Council, as the competent authority will need to consider the potential for both alone and in-combination indirect effects as a result of the operational phase of the proposals. We advise that this should focus predominantly on increased recreational disturbance to the aforementioned internationally protected sites.

A range of techniques were discussed in detail including the funded wardening of the most sensitive sites, improvement to and promotion of less vulnerable recreational areas, temporary measures such as seasonal footpath closures/fencing and the provision of high quality semi-natural alternative Green infrastructure. Whilst the exact package of measures have yet been finalised it is important that these applications are considered in line with the emerging strategic approach. One key element in addressing cumulative impacts as a result of recreation disturbance will be the provision of high quality, semi-natural green infrastructure on-site which will serve to absorb the day-to-day activities, such as routine dog walking, and thereby reduce any increase in visits made to the internationally protected sites. We note that at present 22% of the total site (56.5ha) is allocated for multi-functioning Green infrastructure (including 7.6ha open space, 2.7ha green infrastructure and 2ha as drainage areas). This is well below Natural England's recommended 40% provision of GI.

Much reference is made within the ES (pg 202, paragraph 11.120) to a consistency with the Accessible Natural Greenspace Standards, and this is used as a key argument in concluding that there will be no likely significant effect as a result of increased recreational disturbance (ES pg 215, 11.200), however the ANGSt targets are not designed to be used in this way. ANGSt targets are focussed on providing people access to green spaces for the health, recreational and educational opportunities they provide. We would expect the Local Authority to be striving to

meet these targets for the good of the Borough's residents anyway and it is inappropriate to consider that meeting them will, alone, address any and all impacts as a result of recreational disturbance. Furthermore these targets are tiered and whilst we are satisfied provision is being made on-site to meet the target of a 2ha site within 300m of each residence, it is not clear whether the additional targets, including 20ha site within 2km of each residence, one 100ha site within 5km; and one 500ha site within 10km are met.

We recognise that recreational disturbance is a complex issue and there is still a lack of conclusive evidence for the 'trigger points' when a disturbance impact, such as a bird being flushed from a nest, has a significant effect upon a population, however it is important that potential impacts are considered in a proportionate way. Natural England recognises that in GY Borough disturbance as a result of tourism, rather than residents plays a major role and that the risk directly attributable to this site is likely to be relatively low; however 850 houses associated with this application and further 130 house application immediately adjacent represents a significant increase to the population.

#### Recommended requirements of further information

It is the view of Natural England that whilst this application does not contain the necessary information to enable this judgement, that it should be relatively straightforward to address this. Natural England advises that the following information should be requested from the applicant, in order to screen the project to check for the likelihood of significant effects:

- Following discussions with GYBC development control and strategic planning advisers a Recreational Disturbance Strategy will need to be developed which assesses the risk to the internationally designated sites and details the avoidance and mitigation measures to address this risk. This would be expected to include the details of the existing mitigation measures as identified in the ES, as well as details of any contributions required to off-site mitigation measures (such as wardening of designated sites) and how the on-site green infrastructure (intended to absorb day to day recreational activities) will be secured and managed in perpetuity.

#### Soils and Land Quality

Having considered the proposals as a consultation under the Development Management Procedure Order (as amended), and in the context of Government's policy for the protection of the 'best and most versatile' (BMV) agricultural land as set out in paragraph 112 of the National Planning Policy Framework, Natural England draws your Authority's attention to the following land quality and soil considerations:

1. It appears that the proposed development comprises approximately 56ha of agricultural land. The site is likely to comprise a significant amount of 'best and most versatile' (BMV) agricultural land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system).
2. Natural England holds detailed soil survey data from a 1994 survey (based on current post 1988 criteria) for some parts of the application site which shows the presence of Grade 1 and 2 soils. We also hold further soil survey data from a 1980 survey showing a mix of Grade 1, 2 and 3a land. However the 1980 survey was only

carried out at a reconnaissance scale and used technical criteria which have been superseded.

3. The applicants have not carried out any detailed soil surveys of the site and have relied on desk top assessments. As acknowledged at 7.44 of the Environmental Statement reliance on published ALC maps does not provide accurate grading at a site level. Natural England would recommend that a detailed ALC survey should be carried out to allow decisions to be made using robust and detailed information. An ALC survey can also be used to identify the soil resources present on the site as part of the Site Waste Management Plan or Materials Management Plan in line with the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The applicants already propose to follow the DEFRA Code (see ES para 7.36).

4. The ALC survey (and soil resources survey) should be undertaken by an experienced soil scientist or practitioner. It should apply a sampling density of at least one auger boring per hectare, supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres, and the ALC assessment made in accordance with the technical guidelines contained in Agricultural Land Classification of England and Wales- Revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988)

5. Government policy is set out in Paragraph 112 of the National Planning Policy Framework which states that:

*'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'*

6. We advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site. Detailed guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks) and we recommend that this is followed. Natural England recognises and is supportive of the applicant's commitment to follow the DEFRA Code.

#### Green Infrastructure potential

The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such, Natural England would encourage the incorporation of further GI into this development (in line with the 40% target above).

As discussed above multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation, biodiversity enhancement (including reconnecting fragmented habitats) and, in this circumstance, by alleviating recreational pressures on designated sites.

#### Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for

bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

### Protected Species

We have not assessed this application and associated documents for impacts on 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.

### 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; and
- 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, Page 6 of 6 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.

### **Second Response:**

Natural England notes that the HRA has not been produced by your authority, but by Norfolk Wildlife Services on behalf of the applicant. As competent authority, it is your

responsibility to produce the HRA. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority, however we advise that further work is necessary for this HRA to be able to conclude no adverse impact.

The appropriate assessment concludes that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that it is not possible at this stage to ascertain that the proposal will not result in adverse effects on site integrity. It is Natural England's view that it should be possible to reach a conclusion of 'no adverse effect' however at present the assessment currently does not provide enough certainty to justify the assessment conclusion. Further consideration of how mitigation options will be secured is required, and Natural England provides the following advice on the additional assessment work required.

### Background and strategic position

As discussed in our letter we recognise that recreational disturbance is a complex issue and that assessment of impact needs to be pragmatic, albeit still within the context of the approach required by the Habitat Regulations. In considering this application we have started from the following principles:

- There is evidence (NWS 2012 report assessing GNDP growth, and Footprint Ecology's 2013 HRA of GY Core Strategy) that recreation is having an existing impact on the special features of Breydon Water, Great Yarmouth North Denes Winterton - Horsey Dunes internationally designated sites
- These impacts are managed to a degree that they are just about considered acceptable, however the future of this management is not considered secure.
- There is reason to believe housing development will increase the number of visitors and that impacts will increase if the number of visitors increases.

As stated in our original letter we are strongly supportive of the progress being made at a strategic planning level, in particular the emerging Core Strategy European Habitat Mitigation Plan. This plan identifies a comprehensive suite of monitoring and mitigation measures and will be very important in assessing and responding (when necessary) to recreational risk, however, has not yet finalised where funding will come from to deliver this work. These measures will need to be implemented to ensure compliance with the Habitat Regulations and there is a risk of non-compliance until these measures can be secured. Because these documents have not been finalised or formally adopted there is a greater onerous on individual applications to demonstrate that they will not impact upon designated sites either alone or in-combination.

### Impacts upon Great Yarmouth North Denes

We broadly agree with the conclusions of no likely significant effect, or no adverse effect for all of the sites identified when this proposal is considered alone. However, it remains our view that the cumulative effects of this proposal, in addition to development proposals in, and outside of the district have not been fully addressed, particularly effects upon North Denes and advise that further consideration is necessary.

GY North Denes is highly accessible (in a way that Breydon isn't) and is in relatively close proximity to the development making it more likely as a destination for visitors. Paragraph 8.2.5 states that 'There has been no significant nesting within the North Denes section of the SPA since 2010. Nesting birds are believed to have moved to the Winterton section as a result of reduction in suitable habitat at North Denes i.e. reduction in foredunes area from sediment movement, and since 2011 the offshore site at Scroby Sands with its new artificial reef has also become attractive.' Whilst these statements are true with regard to habitat suitability in the two sections of the SPA, there is no current evidence for foraging within the 'artificial reef' of the turbine array, and therefore it is our view that these comments do not represent the full picture. The site has previously supported the largest colony of little terns in the UK and there is strong evidence which suggests their settling patterns are influenced by natural coastal cycles, specifically the cyclical pattern of dune movements. We recognise that at present there is not a large colony nesting on the beach at North Denes however this should not be considered a long term trend rather more a stage within a cycle. Scroby Sands is known to be currently acting as 'new' habitat for the terns however these sandbanks are very vulnerable to weather patterns and could quickly disappear under certain weather conditions forcing the terns back onto the beaches at North Denes. Paragraph 8.2.6. goes on to state 'When present at North Denes, the site was successfully wardened using fencing and it is presumed that this would continue if the birds were to return'; this does not reflect the fact that the future of this project is not secured and therefore should not assume the continuation of this as a mitigating measure. Whilst the RSPB, we're sure, hope to continue this work, they are currently providing mitigation for this and other developments without any recovery of those costs and in the long term, given the economic climate this should not be relied upon as a mechanism for delivery of mitigation without any contribution being made towards it. We would strongly recommend that the RSPB are consulted regarding this HRA and specifically the issues at GY North Denes. Given that the conclusion of the stage 2 assessment for Great Yarmouth North Denes relies so heavily on the existing wardening scheme it is Natural England's view that it would not be inappropriate to seek developer contributions to help secure the future of this project.

#### Further comments

- We are satisfied that potential impacts of water abstraction, surface water and sewerage disposal and construction dust are ruled out as of no likely significant effect to the identified sites.
- The HRA report focuses on accessible natural green space and public open space provision and it is our view that it makes certain assumptions about the use of green infrastructure. Whilst we are very pleased to see that the site meets ANGSt requirements and that the GI provision is approximately 39% of the site, this does

not automatically mitigate for off-site risks to internationally designated sites. An example of this can be clearly seen in Table 3. Of a total site of 56.48ha, and total GI provision of 22ha, over half is inaccessible (i.e. private gardens or school property) and many of the other elements are unlikely to contribute proportionately to absorbing recreational activities, for instance people are unlikely to use road verges (20% of GI provision) as for dog walking as they will be unable to let dogs of the lead. Whilst we are by no means suggesting that these areas won't fulfil a function for both people and wildlife, they are a different set of functions to those required to mitigate impacts on internationally designated sites.

- We are pleased to see (as identified in paragraph 4.1.29.) that consideration has gone in to making linkages to ensure areas of green space are accessible on foot with a series of green corridors alongside Clay Lane and Jews Lane and through woodland belts to the south of the site. It would have been helpful to have included a map demonstrating these linkages, identifying, for instance, possible circular walks which might alleviate some of the concerns about the GI provision and enabling a greater confidence in the findings of the report.

### Conclusion

It is Natural England's view that **whilst there are some deficiencies within the HRA report as discussed above, it is sufficient to enable a conclusion of no adverse effects on integrity of sites to be made when this application is considered alone. It is, however, our view that the cumulative effects of this proposal in addition to development proposals in, and outside of the district have not been fully addressed and advise that further consideration is necessary to secure the mitigation measures so confidence can be had in a conclusion of no adverse effect.**

Because the Monitoring and Mitigation plan associated with the HRA of the Core Strategy has not been secured, it is our view that we cannot yet have confidence that cumulative impacts of this application with other proposals can be ruled out. The identified impacts will need to be addressed and if you are minded to consent this application as it is, **this may mean an opportunity to secure developer contributions towards the necessary mitigation is missed.** There would then be a responsibility upon your Council to ensure these impacts are fully mitigated for and addressed within your emerging Core Strategy and its associated Monitoring and Mitigation Plan.

This proposal does not appear to affect any statutory protected sites or landscapes, or have significant impacts on the conservation of soils, nor is the proposal an EIA development.

## **3.9 Environmental Health –**

### Contaminated land

The historic agricultural use on which the proposed development is proposed to be sited does not present any significant concerns with regard to any potential land contamination. If however, during any stage of development any suspected

contamination is unearthed then work is to cease immediately and the developer is to contact Environmental Health.

### Air Quality

The submitted Environmental Impact Assessment (Bidwells) highlights the potential problems of airborne emissions during the site preparations and construction phases of the proposed development. Therefore, the following measures should be employed:

- An adequate supply of water (protected against the frost) available for suppressing dust;
- Access routes and side roads are to be swept and washed down on a regular basis to help prevent vehicle movements releasing dust into the atmosphere;
- Crushing and screening equipment is to have integral dust suppression;
- Mobile crushing and screening equipment is to be sited distant from the identified existing receptors along the north-easter boundary of the site;
- Any bulk aggregates stored on the site are to be stored in screen bays as to minimise the disturbance by prevailing weather conditions;
- Vehicles carrying loose aggregate and workings are to be sheeted at all times;
- Mechanical cutting equipment with integral dust suppression should be used;
- There should be no burning of any materials on site;
- And any other mitigation measures recommended by the Environmental Assessment (Bidwells)

### Noise

Due to the proximity of existing properties the hours of site operation should be restricted to :

- Monday to Friday – 07.30 hours – 18.00 hours;
- Saturdays – 08.30 hours – 13.30 hours;
- No work on Sundays and Bank Holidays

The applicant is strongly recommended to advise neighbouring residential properties and businesses of the proposals , together with contact details in the event of problems.

### **3.10 Building Control** – No comments that affect planning.

**3.11 Refuse Collection** – Roads need to be wide enough for refuse vehicles to gain access and vehicles will need to be able to turn if a ‘dead end’ All properties require a bin storage area of the public highway (within the boundary or communal area) Bins would need to be presented at closest point to the road for collection.

Trade waste contract required with collection from least public area.

**3.12 National Grid-** has apparatus in the area and has no objection. Applicant should contact them directly about requirements.

**3.13 Housing Strategy and Housing Options** - I am writing to support the provision of affordable housing (10%) within the above application particularly the detailed mix of 6 x 1 bedroom, 4 x 2 bedroom and 6 x 3 bedroom units identified as to be provided within Phase 1.

I also welcome the opportunity to work with the Developer to provide the best mix of type/size of units on other phases to reflect any changing housing needs within Great Yarmouth.

**3.14 Conservation** – suggests that the site design better reflects the original vision for the site as envisaged in the Norfolk and GYBC Design Guide from 20 years ago. The design submitted is austere and regimental and will not produce an atmospheric place to live.

### **3.15 Strategic Planning Policies**

The current policies specifically affecting the site at the time of writing are as follows:

#### 1. Saved Great Yarmouth Borough-Wide Local Plan Policies (2001):

The NPPF states<sup>2</sup> that where Development Plans were adopted prior to 2004, due weight should be afforded to relevant policies in existing plans according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

The Council has assessed the extent to which the saved policies of the borough-wide local plan are in conformity to the aims of the NPPF and concluded that of the 232 saved policies, 196 were consistent, 20 partially consistent and 16 not consistent (14 of which related directly to Bure Loop) with the NPPF. Therefore, those policies assessed as ‘consistent’ with the NPPF should be considered as up-to-date and full due weight should be afforded to them. NPPF consistent policies which are considered relevant to the application are outlined below:

**EMP14:** Proposals for general industry and warehousing, and for estates comprising light industry will be required to include adequate separation

---

<sup>2</sup> Paragraph 214 National Planning Policy Framework

**EMP16:** Proposals for industrial, office or warehousing uses within existing settlements will be permitted provided that:

- (A) The proposal is compatible with surrounding land uses and its scale is in keeping with the size and character of the settlement;
- (B) Adequate access and service arrangements can be provided;
- (C) There would be no significant adverse effect on the amenities of nearby residential properties;
- (D) The development would not significantly intrude into areas of landscape importance; and
- (E) The development would not have a significant detrimental impact on areas of wildlife importance.

**HOU15:** All housing development proposals including replacement dwellings and changes of use will be assessed according to their effect on residential amenity, the character of the environment, traffic generation and services. They will also be assessed according to the quality of the environment to be created, including appropriate car parking and servicing provision.

**HOU16:** A high standard of layout and design will be required for all housing proposals. A site survey and landscaping scheme will be required with all detailed applications for more than 10 dwellings these should include measures to retain and safeguard significant existing landscape features and give details of, existing and proposed site levels planting and aftercare arrangements.

**TCM13:** Development will not be permitted where it would endanger highway safety or the satisfactory functioning of the local highway network. In appropriate cases a traffic impact assessment will be required to demonstrate that development proposals can be satisfactorily accommodated within the highway network taking into account any improvements proposed.

**SHP6:** Subject to highway and environmental considerations, the council will permit the provision of new local shopping facilities and non-retail commercial uses in the neighbourhood and village shopping centre provided that the development is of a scale compatible with the size and character of the centre.

**EDC1:** Where proposals for development create a direct need for additional education provision which cannot be met by existing facilities determined by the local education authority and which would create the need for extensions and/or alterations to existing schools or the provision of new schools the council will seek a contribution proportionally towards the cost of the improvement, or the new school.

**EDC4:** The Borough Council will favourably consider development proposals for the joint provision of community/educational facilities on land in educational use.

**INF12:** Proposals for new development will only be permitted if they can be properly serviced or agreement can be reached to ensure development does not proceed in advance of services being provided.

**NNV5:** In the areas around settlements shown on the proposals map as 'landscape important to the setting of settlements' the Council will permit development provided a developer can demonstrate essential need or that the development would not impinge on the physical separation between settlements particularly between Great Yarmouth and Caister and Gorleston and Hopton which are major gateways to the town, or give rise to any other significant adverse impact<sup>3</sup>.

**NNV10:** In connection with new development the Borough Council will, where appropriate, expect the retention, restoration and creation of landscape features and wildlife habitats.

**NNV16:** Proposals for the development of land regarded as the best and most versatile land i.e. land classified as grade 1, 2 or 3a by the Ministry of Agriculture, Fisheries and Food, will not be permitted unless it can be demonstrated that there is no other suitable sites for the purpose and, that, in so far as is possible land of the lowest classification has been used.

**BNV2:** Within 'areas of known archaeological significance' and 'areas of potential archaeological significance' the Council will not determine any application for built development unless the application is accompanied by an archaeological evaluation undertaken by a recognised archaeological field unit to a written brief approved by the Council. Planning permission will only be granted if the evaluation reveals that any archaeological remains:

- (A) Would be unaffected by the proposed development; or,
- (B) Are not of sufficient importance to warrant their physical preservation in situ; or,
- (C) Could be sympathetically preserved in conjunction with the proposed development, or taking account of the importance of the remains and the need for development, where preservation in situ would not be feasible or merited.
- (D) Can be excavated and preserved by record by the implementation of programmes of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved by the Council.

**BNV15:** All new estate layouts whether residential or employment use, as well as individual groups of building or structure, should be designed so as to minimise the incidence of burglaries and crime which may be created by poor design. Designers and architects will be encouraged to provide well lit, visible, secure environments.

**BNV16:** The Council will permit new development, including modern architecture, which provides a high quality of design and townscape complimentary to its setting, and which would result in enhancement of an area. To this end, the Council will not oppose proposals for the suitable replacement of existing buildings or structures which detract from the character or appearance of an area.

**REC8:** Where the site of a residential development or part of a larger residential scheme provides 20 or more child bed spaces, the Council will require provision of

---

<sup>3</sup> NPPF:- should have regard to the landscape character assessment

recreational/amenity space and/or children's play-space proportionate to the scale of the development or the overall scheme as appropriate

## 2. Local Plan

The Core Strategy Local Plan document was formally submitted in two parts by Great Yarmouth Borough Council on Tuesday 1 April and Monday 7 April 2014 to the Secretary of State for Communities and Local Government (Secretary of State) for independent examination.

### *Submission Core Strategy*

The Great Yarmouth draft Local Plan Core Strategy is at an advanced stage of preparation with the Publication Draft Core Strategy published in September 2013 ready for submission in Spring 2014, and is therefore a relevant material consideration in the determination of the application.

The emerging Core Policy CS18 underpins a sustainable urban extension of Bradwell, therefore the criteria based policies should be taken into consideration: The emerging policy in its entirety is presented below:

### *Policy CS18 – Extending the Beacon Park development at land south of Bradwell:*

*The existing Beacon Park development is a high quality mixed-use area of both residential and commercial uses. It also benefits from Enterprise Zone status. To ensure that the proposed sustainable urban extension to Beacon Park at land south of Bradwell is developed to the highest possible standard, proposal must:*

- (a) Seek to create a series of locally distinctive, high quality, walkable neighbourhoods that are well connected to the existing urban areas of Bradwell and Gorleston and the wider rural countryside through enhanced bus connections, footpaths, bridleways and cycle ways*
- (b) Provide for approximately 1,000 new homes, offering an appropriate mix of house types and sizes informed by the Council's Strategic Housing Market Assessment in accordance with Policy CS3*
- (c) Seek to maximise the provision of on-site affordable housing by undertaking a site specific viability assessment*
- (d) Develop a phasing strategy that facilitates the delivery of the total amount of proposed housing within the plan period*
- (e) Provide for approximately 10-15 hectares of new employment land to the south of the new A12/A143 link road and west of the existing Beacon Business Park. This employment area should seek to provide a range of office accommodation and light industrial units of varying sizes (Use Classes B1 and B8), including small starter units or managed units if appropriate*
- (f) Reduce the potential impact of the development area on the existing wider transportation network including the A12 trunk road by making appropriate enhancements to the surrounding road network and a new developer funded link road from the A12 through Beacon Park to the A143 Beccles Road*
- (g) Provide appropriate new community, retail and health facilities to meet the day-to-day needs of new and existing residents and improving where possible, existing facilities in Bradwell and Gorleston in accordance with Policies CS14 and CS15*

- (h) *Ensure that appropriate educational facilities are provided including the provision of a new on-site primary school with nursery and off-site contributions towards secondary school provision in accordance with Policy CS14 and CS15*
- (i) *Seek to ensure that residents and businesses have access to high quality telecommunications and high speed broadband facilities*
- (j) *Protect and enhance archaeology, biodiversity and geodiversity across the site and ensure that where appropriate, mitigation measures are undertaken in accordance with Policy CS11*
- (k) *Incorporate a strategic landscaping and tree/hedge planting scheme to soften the impact of the development on nearby dwellings, the adjacent open countryside and the Broads. This may include making appropriate enhancements to the surrounding landscape*
- (l) *Provide a variety of multi-functional green infrastructure for activities such as public sport, general recreation, children's play and food production throughout the site interlinking with existing green infrastructure in the wider area where possible*
- (m) *Seek to reduce carbon dioxide emissions (over the requirements set by Building Regulations) by 10% through enhanced energy efficiency measures or the installation of renewable or low-carbon sources unless this is not feasible, having regard to the type of development involved and its design, or viable in accordance with Policy CS12*
- (n) *Seek to minimise the risk of flooding by taking into account the findings of the Surface Water Management Plan and the use of Sustainable Drainage Systems (SuDS) in accordance with Policy CS11*

*Due to the strategic nature of this site, planning permission for parts of the site will not be granted unless it is accompanied by a masterplan for the whole area, supported by a comprehensive planning obligations regime. Pre-application engagement with the Local Planning Authority and the local community should be*

*sought in developing a masterplan. It is recommended that any proposed masterplan document be submitted to the SHAPE east design review panel for consideration before a formal application is submitted.*

Whilst the policy is at a proposed submission stage, criteria points (c), (d), (i) & (m) remain currently contested, therefore in terms of paragraph 216 of the NPPF, they are allowed only limited weight in relation to the other emerging policies which have little or no standing objections.

#### *Policy CS2 – Achieving Sustainable Growth:*

This policy underpins CS18 by linking the delivery of new development to a settlement hierarchy. The settlement hierarchy proposed approximately 30% of all new development to take place in the Key Service Centres of Bradwell and Caister. Further reference is made between Policy CS2 and Policy CS18 to the promotion of the area to the south of Bradwell as one of two key strategic mixed-use development sites.

#### *Policy CS3 – Addressing the borough's housing need:*

This policy underpins CS18 by seeking to deliver 1,000 of the 5,700 net additional homes required during the plan period to the land south of Bradwell. The policy seeks to ensure that new housing addresses local housing need by incorporating a range of different tenures, sizes and types of homes to create mixed and balanced

communities. This will be negotiated on a site-by-site basis, having regard to the Strategic Housing Market Assessment (SHMA).

*Policy CS4 – Delivering affordable housing:*

This policy seeks to maximise the provision of additional affordable housing within the overall provision of new developments. Whilst the policy seeks to negotiate the amount of affordable housing on each proposed site according to each housing sub-market areas, the policy states that affordable housing provision for the key strategic site will be considered separately in accordance with policy CS18.

*Policy CS9 – Encouraging well designed and distinctive places*

This policy seeks to encourage high quality and distinctive places which should respond and draw inspiration from the surrounding areas, incorporate key features such as landmark buildings, green infrastructure and public art, promoting positive relationships between proposed buildings streets and creating active frontages. Criteria a) of Policy CS18 is largely underpinned by Policy CS9, and should be fully taken into account in the determination of the planning application.

**3. National Planning Policy Framework (NPPF)**

The National Planning Policy Framework is a material consideration of significant weight in the determination of planning applications. Whilst the adopted plan contains policies where are consistent with the NPPF and are therefore given due weight, where policies are silent or absent, policies in the NPPF takes precedence.

*Paragraph 216* of the NPPF states that from the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- The stage of preparation of the emerging Local Plan (the more advanced the preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and,
- The degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

*Paragraph 38:* For larger scale residential development in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.

*Paragraph 52:* The supply of new homes can sometimes by best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

*Paragraph 61:* Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes

beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and place and the integration of new development into the natural, built and historic environment.

*Paragraph 62:* Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations of the design review panel.

*Paragraph 75:* Planning policies should protect and enhance public right of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

*Paragraph 112:* Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

#### Other Material Considerations

The site was submitted as an expression of interest site during the preparation of the Great Yarmouth Strategic Housing Land Availability Assessment (SHLAA) in 2009. The site was assessed according to the approved SHLAA methodology, in consultation with major stakeholders including Natural England, the Environment Agency and the Highways Authority and was considered to be deliverable and developable site over the plan period, with 200 units included within the Great Yarmouth Borough Interim 5 Year Housing Supply Statement (2013).

### **3.16 Strategic Planning Response**

#### Background:

The proposal comprises a hybrid planning application for full planning permission for Phase 1 of the residential development, including 150 dwellings, open space and highway improvements (new junction onto the A143 and the first section of the new Link Road) and an Outline planning application across the remainder of the site for up to 700 dwellings, 10.36 hectares of commercial/employment land, a new primary school, local neighbourhood centre including retail and other commercial uses.

In parallel, Norfolk County Council have submitted a detailed planning application for the full Link Road between the A143 – through the existing Beacon Park development – to link with the A12. Both planning applications fit neatly together because of close collaboration. The link road is a long standing infrastructure requirement in both the Great Yarmouth Borough-Wide Local Plan and emerging Core Strategy. The general concept conforms to Policy CS18 of the emerging Great

Yarmouth Core Strategy to extend the Beacon Park development to land south of Bradwell.

The application seeks to provide 850 dwellings over the plan period, contributing a significant proportion of the 1,000 dwellings sought under Policy CS18 (a) during the plan period. The total area covered by the planning application does not extend to the whole area regarded as the Key Strategic Site under CS18. The remaining portions of land are not in this land owner's control and are therefore not part of this application.

The concept masterplan seeks to provide 10% affordable housing across the site and forms part of the affordable quota for the detailed 'Phase 1' application (15 affordable units of 150). Whilst this proportion accords to emerging Core Policy CS4, it is contrary to emerging Core Policy CS18 (c) which seeks to maximise the provision of on-site affordable housing by undertaking a site specific viability assessment rather than relying upon the provisions contained in Core Policy CS4.

The concept masterplan outlines the principle of the entire design in terms of how it responds to the existing character and surrounding land uses. The Environmental Statement provides in-depth detail in terms of the extent that the proposal affects issues such as agriculture, air quality, archaeology, climate change, ecology, flood risk & drainage, landscape & visual impact, noise, social economic, transport and utilities.

At a strategic level, the technical assessments confirm that issues such as noise and air quality are unlikely to have a significant adverse impact upon residential amenities and that adequate parking is provided for phase 1 of the application. Therefore the proposal is considered to comply overall with local plan policy HOU15.

Local Plan policies HOU16, BNV15, BNV16 and emerging policies CS9 and CS18(a) seeks to ensure that the overall design, layout and proposed townscape is of a high quality, promotes security and responds to the local character by creating locally distinctive neighbourhoods. The layout of the detailed 'Phase 1' application is orientated around the central public open space with properties aligned in a grid layout. This design typology helps to provide passive surveillance over the area and may help to create interesting and distinctive street frontages depending on the incorporation of design features, elements and varied facades.

Whilst the design and access statement refers to material and detailing principles in the design, few appear to have been translated to the proposed housing elevations which make up Phase 1 of the application. In recent years Bradwell has experienced a number of significant housing developments and many have lacked discernible distinctiveness and detailing. This application provides a significant opportunity to produce high quality design rather than continuing with the homogenous design which permeates throughout Bradwell. Therefore, consideration should be given to incorporating further detailing elements into the overall design in order to comply with local plan policies HOU16, BNV15, BNV16 and emerging policies CS9 and CS18 (a).

The detailed 'Phase 1' application is also considered to relate poorly, in terms of walkable access, to the existing fringe of Bradwell, centred upon the existing bridleway and public footpath connections from Clay Lane and Jew's Lane. Detailed comments from a Public Right of Way perspective are appended as part of this consultation report.

The outline permission seeks the development of approximately 10.4 hectares of employment land in the south-east section adjacent to Beacon Business Park, during the later phases. The employment zone is separated from the residential area by the link road to the north and open space to the west and proposes elements of green infrastructure to the south to soften the impact upon the open landscape. These outline principles are considered to conform to local plan policy EMP14 and EMP16 and in accordance with emerging Core Policies CS18 (e) and (k).

The concept masterplan seeks to develop 2 hectares of land for a new primary school and up to 0.5 hectares of land for a new local centre comprising a mix of retail and non-retail commercial uses. Given their size and respective relationship to the needs of the whole development, the outline proposals for a new primary school and local centre are considered to be in line with local plan policy SHP6, EDC1 and emerging Local Plan Core Strategy policies CS18(g) and (h).

Local Plan Policies NNV5, NNV10, NNV16 and emerging policy CS18 (j), (l) & (m) seek to ensure that development would not impinge upon landscape character but rather restore or create landscapes and encourage biodiversity and provide multi-functional green infrastructure.

The technical studies supporting the Environmental Statement, particularly in terms of landscape & visual impact and ecology demonstrates that the proposal would not have a significant detrimental impact upon landscape quality or the area's wildlife and habitats. Rather, the provision of green infrastructure swathing through the development may seek to encourage and positively enhance biodiversity or new habitat mosaics in to the area.

Breydon Water SPA and Halvergate Marshes SPA were categorised as the most significant receptor to potential impacts arising from the development but were adjudged as having a neutral impact during both construction and operational phases of the development. Major negative impacts were only identified in regards to the permanent re-development of Arable land, however this was assigned an ecological receptor value of 'Very Low' based upon the evidence of the surveys.

The Core Strategy Habitat Regulation Assessment (HRA) concluded that there could be significant disturbance effects at Breydon Water SPA and Ramsar site as a result of the scale and location of new development proposed. It is expected that access levels will be low and therefore have no significant disturbance effect on the SPA although there is some uncertainty, given that the significant levels of development at the Waterfront and in Bradwell (directly to the south of the estuary). It will be important to ensure measures are in place to check that access levels remain low and that potential mitigation or avoidance measures can be put in place should access levels increase. This is to ensure that there are no adverse effects on the integrity of the site from recreation impacts.

Therefore the HRA suggests that visitor monitoring is required to trigger mitigation measures to prevent any adverse impacts on the site. Potential mitigation measures include fencing, signposting, re-routing of paths, keeping dogs on leads and provision of alternative sites.

With regards to NNV16, the proposal seeks to develop 56.5 hectares of predominately agricultural land which is classified as being within Grades 1 & 2 agricultural land. This is contrary to the aims of local plan policy NNV16 which seeks to protect high grade agricultural land and direct development to lower tiers where possible. The accompanying Environmental Statement suggests that whilst the impact upon agricultural is permanent and therefore significant, the impact upon soil resources could be mitigated through a Soil Management Plan and that the effects on occupying business are not adverse due to existing farm diversification that has already occurred.

Emerging Policy CS18 (m) seeks to reduce carbon dioxide emissions by 10% through enhanced energy efficiency measures or the installation of renewable or low carbon sources. Whilst the accompanying planning statement to the application concludes that there are 3 viable solutions to delivering 10% of the development's energy through the use of renewable energy<sup>4</sup>, the information does not go on to inform whether on-site householder improvements (i.e. solar panelling) or decentralised uses (i.e. Biomass boiler) will be sought as part of the development. Subsequently the detailed Phase 1 application for 150 homes has made no allowance for on-site or decentralised energy sources.

Lastly, criteria (n) of Policy CS18 seeks to minimise the risk of flooding by taking into account the findings of the Surface Water Management Plan (SWMP) and the use of Sustainable Drainage Systems (SUDS) in accordance with Policy CS11. The SWMP has been finalised but not yet adopted by the Council and has identified the application as being within the Bradwell Critical Drainage Area (CDA) and therefore consideration should be given to addressing the risk.

The Environmental Statement (ES) supporting the application has referred to the emerging Great Yarmouth SWMP and references a particular area at risk of surface water flooding within the site, particularly in the vicinity of Jews Lane<sup>5</sup>. Overall the ES identifies that development of the existing Greenfield site could result in an increase in impermeable area and has the potential to increase surface water run-off from the application site which could have a long term substantial impact on flood risk at the site and elsewhere.

The ES proposes 4 types of mitigation measures to address identified issues in foul drainage, surface water drainage, flood risk and water resources<sup>6</sup> and ranges between provided a moderate beneficial effect to minor adverse and negligible effects.

---

<sup>4</sup> Para 8.17 (Planning Statement, Bidwell 2013)

<sup>5</sup> Para 12.31 (New Neighbourhood at South Bradwell, Great Yarmouth. Environmental Statement, Vol. 1)

<sup>6</sup> Table 12.1 (New Neighbourhood at South Bradwell, Great Yarmouth, Environmental Statement, Vol. 1)

## Conclusion

Paragraph 214 of the National Planning Policy Framework requires due weight to be given to development plans adopted prior to 2004 according to their degree of consistency. The Borough-Wide Local Plan Policies considered in Section 1 of this report are considered to be consistent with the NPPF and are therefore afforded due weight in the determination of the application.

<sup>1</sup> Para 8.17 (Planning Statement, Bidwell 2013)

<sup>1</sup> Para 12.31 (New Neighbourhood at South Bradwell, Great Yarmouth. Environmental Statement, Vol. 1)

<sup>1</sup> Table 12.1 (New Neighbourhood at South Bradwell, Great Yarmouth, Environmental Statement, Vol. 1)

Paragraph 216 of the National Planning Policy Framework states that decision takers may also give weight to relevant policies in emerging plans depending on the stage of preparation, degree of consistency with the NPPF and the extent to which there are unresolved objections to relevant policies.

The emerging Local Plan Core Strategy is at an advanced stage of preparation and has been prepared in accordance with the NPPF. There are 4 criteria points relevant to emerging Core Policy CS18 (c, d, i & m) which have outstanding resolved objections. Therefore the emerging policies identified in Section 2 of this report are considered to be a significant material consideration in the determination of the application, but with less weight attached to criteria (c), (d), (i) & (m) of Core Policy CS18.

Paragraph 196 of the National Planning Policy Framework states that the NPPF is a material consideration in planning decisions. Therefore those NPPF policies identified in Section 3 of this report are considered to be a significant material consideration in the determination of the application.

Paragraph 159 of the National Planning Policy Framework states local planning authorities should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. The application site was assessed as deliverable and developable within the plan period and used as evidence to underpin the emerging Local Plan Core Strategy. Therefore the findings of the SHLAA identified in Section 4 of this report are considered to be a material consideration of limited weight in the determination of the application.

The planning application collectively conforms to the general principle of identified policies of the Great Yarmouth Borough-Wide Local Plan (2001) emerging policies of the Local Plan Core Strategy (specifically Policy CS18) and the relevant policies outlined in the National Planning Policy Framework with the exception of the following policies as outlined below:

The planning application is contrary to emerging Local Plan Core Policy CS18 (c) as it is not accompanied with a site specific viability assessment to be undertaken to maximise affordable housing provision. This is a material consideration, however it remains as an unresolved objection<sup>7</sup> and is therefore only afforded limited weight.

<sup>7</sup> Local Plan Core Strategy Regulation 19 (September 2013)

The overall design of the detailed phase 1 element of the planning application should go further to incorporate locally distinctive or architecturally significant elements to ensure the proposal better complies with Borough-Wide Local Plan policies HOU16, BNV15, BNV16 and emerging Local Plan Core Strategy policies CS9 and CS18 (a) which seek to produce a high quality urban environment. Currently, the overall design is austere, regimented and lacks a sense of place.

The detailed phase 1 element of the planning application should also go further to improve connections between the existing development off Meadowland Drive and the proposal in order to fully comply with Paragraph 61 and 75 of the NPPF and emerging Local Plan Core Strategy policy CS18 (a). Full justification is appended as part of this report.

Note 1 – Comments relating to Public Rights of Way

Note 2 – Comments relating to Trees

*Notes regarding Public Rights of Way affected by application 06/13/0652/O  
Development at Wheatcroft Farm  
Master Plan*

Throughout the application reference is made to Clay Lane (BR 7 Bradwell) and Jew's Lane (BR 10 Bradwell) as being public footpaths; however they are bridleways and both are recorded in The Definitive Statement of Public Rights of Way as having a minimum width of 10 feet. They are attractive, well used, predominantly country ways and both form part of a Norfolk County Council promoted circular route (Bradwell 8).

Although a 'safe crossing point' is referred to in the Design and Access Statement (page 51) a special equestrian crossing (Pegasus Crossing) should be installed where Clay Lane crosses the line of the proposed A12 – A143 link road.

The Design and Access Statement makes reference to the bridleways and how they will "provide strong links to the adjacent development and countryside as well as allowing existing residents' access to newly proposed facilities". Unfortunately, access points from the development to the public rights of way network generally appear limited and nonexistent in Phase 1 (see below). With the proposed development eventually enveloping both bridleways, and with limited exit points, it may make them inconvenient or possibly intimidating to use. To prevent this additional links and access points to the bridleways should be created allowing residents to make to full use of them.

As these bridleways will eventually become urban routes thought should be given to surfacing them in a material suitable for pedestrians, cyclists and also equestrian users. Advice on recommended materials should be sought from Norfolk County Council's Public Rights of Way Officer.

The master plan states these routes will be used as links to the adjacent development and also access to proposed facilities; therefore they will need footway lighting installed so that they can be used after dark.

The exact site boundary on the application location plan (dwg. no. S522800088-118), and on other supporting drawings, is unclear in the area around Clay Lane and the proposed Kings Drive development (06/13/0643/F). Confirmation as to who has title of the boundary hedges and the sub-soil over which the bridleway passes should be sought as this could cause issues with maintenance and enforcement of the bridleway in the future (encroachment, overhanging vegetation etc.).

#### *Phase 1*

The above also applies to Phase 1. In addition there appears to be no way for residents of this development to gain access to Clay Lane, which would be the shortest route to Bradwell village centre on foot or by bicycle. A pedestrian/cycle link inserted between plots 45 and 46 would seem a logical location based on the proposed site layout.

#### *Master Plan*

The overall concept masterplan appears largely acceptable, however the master plan is only at the outline stage and detailed plans of the proposed tree works will be required before a full assessment can be made. Each phase should conform to British Standard BS 5837:2012 and include documents such as Tree Protection Plans, Arboricultural Method Statements and Arboricultural Impact Assessments. Further documentation may be requested by the local authority at each phase. As an outline the plans do not provide a clear indication as to which existing trees are to be removed; the detailed plans must clarify this before development starts.

The site currently contains large areas without significant tree cover. The most significant specimens are situated on the field and highway boundaries as well as the buffer strip around Beacon Park. The trees and hedgerows are an important habitat and provide significant amenity for the footpaths and bridleways. Loss of these hedgerows, especially those alongside Clay Lane should be rejected. The application suggests that existing hedgerow will be retained and expanded. Good management of the hedgerow is a positive for the application and should be enforced through planning conditions. The site contains a relatively small amount of large, mature trees, however many of the mature trees are an important landscape feature and should be retained in compliance with suggestions in the environmental Report Volume 1 (page 252).

Providing a quality, green environment alongside the footpaths and bridleways will encourage a greater use of them and less reliance on cars. However the quality of the cycle and footpath routes should be expanded beyond the application area to provide a cohesive, good environment along the entire route.

The design principles suggested within the Design and Access statement under the heading 'Planting' should be adhered to within future full applications. However it states, 'Street Trees will be used where possible', street trees are important and should not be a secondary concern. The masterplan shows limited street planting on the smaller roads, using trees can soften the landscape. Where there is less space smaller trees would be best. Street trees will aid the developments compliance with CS18 in the emerging Core Strategy.

As this is only an outline there is not sufficient enough detail of the protective measures used during and after the development to make a full judgement regarding the existing trees. A planning condition could be imposed that prohibits the removal of trees until detailed plans are provided.

The cohesiveness of the buffer strip surrounding Beacon Park will be broken by the new link road. However the masterplan suggests the buffer strip will be extended in the south around the designated employment area. This new section of tree cover should replace the trees lost during the construction of the link road. Replanting of the new tree belt should begin as soon as reasonably possible to negate this loss. The active use of the employment area in the south east of the site should be discouraged until these trees are planted. The species of tree should be the same mix as the current tree buffer.

There is significant tree cover surrounding Wheatcroft Cottages and the master plan gives little indication whether these trees are to be retained. Many of these trees are mature specimens which should be retained.

The master plan shows a reasonable amount of planting alongside the larger roads. The designs partially conform to policy CS18 (point K) of the emerging core strategy by incorporating levels of landscaping and open space. The boundary hedging should soften the impact of urban dwellings adjacent to rural areas and the retention of hedgerows is a positive. However a greater level of tree planting alongside the smaller roads would be recommended. High levels of landscaping should be enforced in the detailed plans for each subsequent phase. Groups of communal trees could be considered as landscape features. The density of housing may change from the outline to detailed applications which could impact upon the landscaping.

The landscaping of the masterplan should not be considered in isolation, the landscaping styles should connect with adjacent urban areas. A cohesive landscaping approach will allow the new development to blend with the existing parts of Bradwell as well as other recent applications to the north of the development site. The recommendations outlined in paragraph 6.3 of the document, 'Arboricultural Constraints Bradwell, Concept Masterplan for Persimmon Homes' appears sound, but greater detail would be expected in the full applications. The opinions of the Tree and Landscape Officer should be considered regarding the protection of existing trees.

### *Phase 1*

The phase 1 'Site Layout' (referenced as SL01) should contain a greater level of tree planting to offer a higher quality environment, especially alongside the 'Asphalt to Type 6' roads. The Site Layout plan states 'Landscaping shown indicative only, for details see landscaping plan', however a landscaping plan does not appear to be included within the application. After speaking with Bidwell's they have confirmed that the 'landscaping plan' will be formulated in detail at a later stage. The landscaping plan will require more detail to what is currently provided within the Site Layout. This includes, but is not limited to, a replanting schedule detailing species and planting techniques of proposed trees. The trees on site should be of mixed

species, though predominantly native, but also capable of thriving in an urban environment. These ideas are largely put forward in the Design and Access Statement. Phase 1's landscaping should resemble the landscaping in the link road application by using a similar mix of tree species.

The 'Site Layout' shows the hedgerow is to be retained and extended which is a positive for the application. The hedgerow and trees should be given adequate protection through imposed planning conditions. These conditions should include a minimum of 5 years of protection for newly planted and existing trees, this time limit should commence upon the sites completion. Furthermore any trees that are felled during this period should be replaced.

I would also recommend further protective conditions are imposed to the road-lining and footpath trees in the event that the roads are not adopted by highways. Phase 1 partially conforms to CS18 of the emerging Core Strategy; the boundary hedging does soften the dwellings against the rural environment. However the 'Site Layout' should include more trees amongst the dwellings; for example trees lining the secondary and shared roads. This will ensure the development complies with policy CS18 and CS9 of the emerging Core Strategy. The Phase 1 plan does not adequately match the suggestive tree cover of the masterplan. I would recommend a greater level of trees within phase 1. However, as noted on the 'Site Layout', this plan is indicative only and the future landscaping plan may provide a greater level of planting.

I would like elements of phase 1 clarified prior to the plans approval. The 'Tree Protection Plan, Phase 1' (reference OAS 1401-TSO 5) and the Tree Constraint Plans (OAS 1401-TS01 to TS05) are unclear in regards to hedgerow removal. The key suggests that areas of existing hedge or vegetation to be removed will be marked in diagonally stripped lines. The vegetation on the plan is often marked in vertical stripped boxes. It is unclear whether the vertical strips are a separate designation or whether these are marked for removal. I believe the vertically stripped designations relate to retained hedgerow (in line with the site layout), but this should be confirmed prior to development commencing. If the vegetation marked in vertical strips is marked for removal then this should be discouraged. Existing hedgerow should be considered largely sacrosanct, so complete clarity must be achieved prior to development to ensure as little removal as possible.

There is a discrepancy between the 'Site Layout' and 'Tree Protection Plan'. The tree protection plan suggests that group 6 will be removed in its entirety while the site layout suggests only a partial removal of trees. This difference should be clarified prior to approval. The loss of the trees marked G6 and T43 will be negated by the landscaping scheme so is considered an acceptable loss.

The document; 'Arboricultural Implications Assessment and Preliminary Method Statement for Persimmon Homes' appears to be satisfactory however I am not a qualified arboriculturalist. I would recommend seeking Patrick Tabor's opinion, who is the Tree and Landscaping Officer to clarify whether the methods used are adequate and match British Standards.

A revised Tree Protection Plan (reference OAS 1401-TS05 Rev A) was provided by Bidwells to address comments made by Great Yarmouth Borough Council. Great Yarmouth Borough council was concerned that the grey vertical stripes on the original Tree Protection Plan may designate vegetation to be removed. As large portions of the hedgerows were originally mapped as vertical grey stripes there was a concern that a large amount of hedgerow was to be removed.

*The revised plan clearly shows that unbroken, vertical grey stripes refer to; 'Existing hedge or group. Cat C low quality and value' and not vegetation to be removed. The revised Tree Protection plan satisfactorily addresses this concern.*

## **4. Planning Assessment**

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise. Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires that decisions on planning applications must be made in accordance with the policies and proposals in the Development Plan, unless material considerations indicate otherwise. For the purpose of determining this planning application, the Development Plan should be considered as a whole, with appropriate weight applied to each of the policy documents which make up the Development Plan.

4.2 At the time of writing, the Development Plan for Great Yarmouth comprises the saved policies of the Great Yarmouth Local Plan. There is no longer regional guidance as the Regional Spatial Strategy for the East of England (RSS14 or East of England Plan) was finally revoked on 3 January 2013.

### Material Considerations

4.3 Certain material considerations may outweigh policies in the adopted Development Plan, particularly where Development Plan Policies are out of date or have been superseded by National Planning Policy. For the purpose of determining this planning application, the main material considerations are described below.

### *National Planning Policy Framework (NPPF)*

4.4 The NPPF was published by the Government on 27 March 2012 and is a material consideration of significant weight in the determination of this planning application. The NPPF sets out the Government's planning policies for England and how it expects them to be applied (paragraph 1). The document replaces and consolidates previous Government policy statements and guidance and introduces new considerations that may not be reflected by development plan policies that were prepared and adopted in accordance with previous guidance

4.5 As a consequence, the NPPF states that up until 27 March 2013 (one year from its publication) decision takers may give full weight to development plan policies adopted since 2004 if there is a limited degree of conflict with the NPPF (paragraph

214). In other cases, such as the Great Yarmouth Borough Wide Local Plan 2001, adopted policies are to be given weight according to the degree of consistency with the NPPF (paragraph 215).

4.6 In accordance with paragraph 216 of the NPPF, the policies in the emerging Publication Draft Core Strategy DPD may be given weight according to the stage of preparation, extent of unresolved objections, and degree of consistency with the NPPF.

4.7 Paragraph 14 emphasises that “at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking..... For decision-taking this means:

- “Approving development proposals that accord with the development plan without delay;
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- Any adverse impacts of doing so 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.”

4.8 With specific regard to housing development, paragraph 49 states that "housing applications should be considered in the context of the presumption in favour of sustainable development." The NPPF needs to be considered in combination with the Development Plan and, in particular, whether the constituent parts are out-of-date or consistent with that document.

4.9 The NPPF seeks to significantly boost the supply of housing and requires local authorities to maintain a sufficient supply of specific deliverable sites to provide five years' worth of housing plus an additional buffer of 5% or 20% to ensure choice and competition in the market for land (paragraph 47). The current five year housing supply situation in Great Yarmouth as at October 2013 is 6.55 years. This is based on a 20% buffer, due to under-delivery over recent years. The Council have included dwellings within phase 1 within the 5 year housing supply calculation.

4.10 The NPPF requires that where a 5 year supply requirement cannot be demonstrated, the weight to be given to existing Local Plan policies relevant to the supply of housing should be diminished in favour of the policies in the NPPF. However as paragraph 4.9 above demonstrates this is not the case here.

#### *Compliance with local planning policy*

4.11 There is general compliance with adopted Council planning policy.

4.12 Policy HOU15 seeks to protect residential amenity. The technical assessments, including the noise assessment confirms that noise impact of the site will be generally low following completion and noise will not be a significant issue,

other than in a very small area, which is mainly due to traffic from other developments. However, mitigation measures such as fences, double glazed windows and/or careful orientation of facades at the detailed design stage will overcome any issues.

4.13 The concept Masterplan has been developed to ensure other aspects of residential amenity is protected. The concept Masterplan demonstrates that the capacity of the site is capable of siting and accommodating the number of dwellings proposed in a manner which would not affect the amenities of nearby residents, or the residents of properties within the development itself.

4.14 Policy HOU16 requires a high standard of layout and design for all housing proposals. The concept Masterplan and phase 1 housing layout demonstrates a high standard of layout and design, sympathetic to the local character of the area, whilst making the best and most efficient use of land.

4.15 Policy TCM13 states that development will not be permitted where it would endanger highway safety or the satisfactory functioning of the local highway network. The Transport Assessment demonstrates that access can be satisfactorily and safely achieved.

4.16 Policy TCM23 requires that all new road layouts within large scale residential development make provision for access to, or by, a public transport route. The Transport Assessment demonstrates that public transport can penetrate the site. The local bus company has endorsed the proposals in terms of public transport accessibility and proposed routes.

4.17 Policy SHP6 permits the provision of new local shopping facilities and non-retail commercial uses in neighbourhood and village shopping centres provided that the development is of a scale compatible with the size and character of the centre. The proposal includes provision for a neighbourhood centre, including retail and non-retail commercial areas. The Environmental Statement confirms that the neighbourhood centre is compatible with the scale of the development and would not compete with existing local centres.

4.18 Policy EDC1 requires a developer contribution proportionately towards the cost of improvement or the costs of provision of a new school where development proposals create a direct need for additional education provision which cannot be met by existing facilities. The proposal includes a site for a primary school, and the Heads of Terms sets out the contributions towards other educational facilities.

4.19 Policy EDC4 supports the dual use of education facilities. This will be a matter for the school to determine.

4.20 Policy EMP14 requires that proposals for general industry and warehousing, and for estates comprising light industry include adequate separation from existing or proposed neighbouring The concept Masterplan proposes a landscaping buffer around the new employment area.

4.21 A Development Policies and Site Allocations DPD is expected to be published for consultation later in 2013/early 2014 but nothing is available to date.

4.22 The Core Strategy Vision includes an sustainable urban extension to the south of Bradwell to provide an enhanced mix of housing and employment enabling the completion of the Link Road connecting the A143 and the A12 via Beacon Park. This is to provide existing and new residents with easy access to employment, community facilities and shopping, improving their quality of life.

4.23 Policy CS2 sets a requirement for approximately 30% of new development to take place in the borough's Key Service Centres at Bradwell and Caister-on-Sea. In order to achieve sustainable development within the Borough the policy promotes the development of two strategic mixed-use development sites: the Great Yarmouth Waterfront area (Policy CS17) and the Beacon Park extension site at land south of Bradwell, the Beacon Park Extension (Policy CS18)

4.24 Policy CS18 allocates land for up to 1000 new homes, of mixed type and tenure up to 15 ha of employment land, retail, health, education and green infrastructure, and the completion of the Link Road at land to the south of Bradwell, where the application site is located.

4.25 However, consultees have brought out some issues that will need to be addressed either by conditions or through the Section 106 agreements if members are mindful to approve the application.

4.26 In addition there has been negotiations with the applicant which has resulted in an amended Master Plan for the site.

- All highway issues have been addressed subject to the conditions recommended such as the widening of roads to meet county council standards and to allow refuse lorries to enter;
- House design has been changed so that bungalows are incorporated where adjacent residential development exist to the boundaries of the site;
- The Environment Agency comments have been addressed such as removal of dwellings which were identified as within the pathway where surface water congregates under the GYBC Surface Water Management Plan;
- A revised Tree protection plan has been submitted to address the issues identified above

4.27. The new master plan also contains pedestrian links to both existing bridleways and allows for the retention of the existing hedge in Clay Lane which will be extended and strengthened as required. In addition there are some design changes such as house type alterations.

4.28 In addition, the applicants have provided information to allow Natural England to reach a conclusion of no adverse effects on integrity of sites of international importance when this application is considered alone and I recommend the Council adopts this conclusion. Natural England highlights the Council's responsibility in terms of the Habitats Regulations and comments over the cumulative impact of development across and indeed, outside the Borough. The need to address the

cumulative impact via mitigation measures is a very timely reminder, particularly at this sensitive time in the development of the Core Strategy, for both the Borough Council and developers which in reality is a joint responsibility and this is currently being addressed via the plan review.

4.29 Given the assumption that the land is Grade 1 & 2 then only 0.04% of the total area of Grade 1 & 2 land in Norfolk and 1% of this grade of land in Great Yarmouth Borough would be lost to the development. Therefore, no significant weight should be afforded to the loss of agricultural land in this location. The ability for the remainder of the farms and adjoining agricultural land to remain in productive agricultural use will not be jeopardised by the land's development. Furthermore, receipts from the sale of land for development could be used to improve the quality and productivity of land elsewhere on the farm estate.

4.30 Environmental health are happy with the information supplied in technical information provided with the Environmental Assessment subject to the conditions provided in their consultation and outlined earlier in this report. A Noise Assessment of the site has been prepared by 10db Acoustics. The Assessment's methodology was agreed with the Council's Environmental Health Officer.

4.31 The assessment suggests that groundworks associated with the proposed development have the potential to disturb or destroy any archaeological remains that may exist within the site. In order to mitigate for this, further archaeological work will be required. The assessment confirms that a programme of archaeological trial trench evaluation has been agreed with the local authority and this will help to determine the extent and character of any archaeological remains within the site. This work will help to identify if further mitigation work is required; any such work is likely to comprise open-area excavation, and this will be agreed with the Norfolk Historic Environment Service prior to it being carried out.

4.32 The assessment also suggests that the proposed development has the potential to impact upon the historic character of the surrounding area. However, this impact is likely to be of negligible significance and mitigation may only be achieved through the design of the proposed development.

4.33 Residual impacts are minimal, although archaeological excavation, by its very nature, leads to the destruction of archaeological remains. The records and data generated, however, have the potential to contribute to a greater understanding of the archaeology of the area and this may, therefore, be seen as a beneficial impact of the proposed development.

4.34 The assessment concludes that the effect of the proposed development in conjunction with other planned developments in the surrounding area comprises the gradual loss of the archaeological resource of the wider area and the loss or alteration of the historic landscape in this same area. The use of appropriate mitigation measures, as proposed for this site, will help to reduce the effect of the adverse impacts associated with development.

4.35 The development is replacing agricultural land and, as a result, there is an increase in emissions. The Report proposes mitigation measures which would result

in a 10% reduction in emissions when compared to development constructed to current regulations and that 10% of the energy demand will be provided by renewable sources. These mitigation measures include the following:

- High performance building fabric;
- Achieving BREEAM 'Very Good' ratings for non-residential buildings (formally or informally); and
- Providing a minimum of 10% of energy through renewable sources

4.36 In terms of ecology, the Norfolk Wildlife Trust has confirmed that there were no Schedule 1 birds, rare or scarce plants or Great Crested Newts identified on the site or being affected by the development. The site has amongst others the following features of interest:

- Two Natura 2000 sites, being Breydon Water and Halvergate Marshes within 4km;
- Locally significant lengths of hedgerows and grass field margins;
- Minor use by grass snake;
- Communities of breeding and wintering birds typical of an arable landscape, including breeding;
- Skylark, Yellowhammer and Song Thrush;
- Low levels of usage by six species of bats for foraging and commuting; and
- Bat roosts within mature trees on the site and within adjacent farm buildings.

4.37 Given the proposed provision of public open space on the site, the scheme complies with Natural England Accessible Natural Greenspace Standards; no indirect effects from increased recreational pressures are seen as likely on the European protected sites of Breydon Water and Halvergate Marshes. The proposed site restoration scheme will result in a net loss of arable land, but a net gain in hedgerows and grassland. There will be a temporary loss of hedgerows; Existing arable bird communities will be replaced by more urban and woodland species.

4.38 The resulting avoidable effects of development are identified and potential mitigation set out in the Assessment Report. These include specific measures for nesting birds, for any grass snake and for any bats, as well as protection of habitats during construction and in surrounding area. The report recommends that any habitat creation within the site's landscaping should be completed as soon as feasible, especially for hedgerows and treebelts, to allow these to mature.

4.39 The Assessment concludes that as there are no residual effects once mitigation is taken into account and assuming that the mitigation is delivered then there are no significant constraints from site development from ecology.

4.40 Mitigation works should be clearly set out within a Construction Environmental Management Plan as per BS402020. Also, an Ecological Clerk of Works should be appointed for the site with overall responsibility for implementation of mitigation as per BS402020. A Biodiversity Action Plan is also suggested for the site to inform the long-term management of landscaping areas and other public open spaces. It is recommended that any woodland management plan should be undertaken to UK

Woodland Assurance Scheme standards. These recommendations are suggested to be conditioned should members be mindful to approve the application.

4.41 In terms of Foul Drainage, Anglian Water records indicate a 150mm public foul sewer to the north of the site serving the properties at Browston Corner. A further 150mm diameter sewer serves the residential development along the Beccles Road, again north of the site. This becomes a 225mm pipe within Burnet Road/Primrose Way. There are larger sewers available to the east of the site in Edinburgh Avenue, Gorleston, although these have already been utilised in recent times to serve the Beacon Park development. Anglian Water, in a pre-development report Ref. 1003/SP34 (001), dated 26 July 2012, confirmed that the foul drainage from the proposed development is in the catchment of Caister Sewage Treatment Works and that there is sufficient capacity to accommodate the additional flows. In the report, Anglian Water also suggested that a direct connection was likely to have a detrimental effect on the existing sewerage network, and that further investigation was necessary.

4.42 Anglian Water have confirmed that the sewerage system has sufficient capacity to accommodate the development and that it will not cause any significant detriment to the capacity of the existing sewerage system performance, and will not result in any increased discharges to the environment. There is, therefore, no requirement for off-site reinforcement. However, the topography of the site is such that a pumping station will be necessary to collect the foul sewage from the relatively flat site. The final location of this depends to a large extent on the proposed phasing of the development, but is likely to be on the eastern side of the site where ground levels are lowest. The pumping rate will be in the order of 11.34 litres per second.

4.43 With regard to Surface Water Drainage, the site is relatively flat, with ground levels in the region of 12m AOD, reducing down to around 7m AOD, from west to east. Although Gorleston Cliffs to the east are relatively close, there is little risk of tidal flooding in the area. The Environment Agency's Indicative Flood Map also confirms that the site is not at risk of fluvial flooding from the River Yare to the north or from the River Waveney to the south and west. The nearest watercourse is to the southwest of the site and flows westwards to the River Waveney at St Olaves, through Fritton Decoy.

4.44 The Flood Risk Assessment has been compiled to assess the existing level of flood risk for a proposed housing development off Beccles Road, South Bradwell in accordance with the National Planning Policy Framework (NPPF). It also assesses the impact that the site will have on surrounding areas. The report recommends the drainage design for the proposed residential development, so far as it is possible, given the prevailing situation regarding changes under way in current legislation.

4.45 The proposed system of surface water management will ensure that there is no significant flood risk to downstream land owners. The surface water discharges accord with the requirements of NPPF and the Code for Sustainable Homes and an appropriate precautionary response to the potential threat from climate change has been included in the assessment to ensure that this conclusion does not only relate to conditions prevalent at the present time.

4.46 This assessment has highlighted the potential risks to the site from all sources of flooding and concluded that the site is not at risk. This concurs with its designation as being within Flood Zone 1.

4.47 The Assessment demonstrates that the overall effect of the site's development upon the landscape will be beneficial, due to the following key reasons:

- The existing landscape structure is degraded and the proposed development will introduce new lengths of native hedgerow and frequent native tree planting, resulting in the restoration of the landscape structure;
- The existing edge of Bradwell comprises the fences of rear gardens which form incongruous elements in the view towards the north east. The proposed development will result in the redefinition of the built edge of Bradwell so that it forms a more positive element within the view;
- The development in the existing area of Bradwell generally does not reflect local vernacular or contribute positively to local character. The proposed development will use local relevant materials and will contribute positively to the local character

4.48 The Landscape and Visual Impact Assessment has shown that the proposal site is an area of degraded landscape in a wider area of higher quality landscape. It reveals that there are few landscape features away from the hedgerows and trees associated with the two key Public Rights of Way: Clay Lane and Jew's Lane. (Note: the Clay Lane hedgerow is to be retained and enhanced as requested in consultations including the Parish Council).

4.49 The Assessment recommended mitigation measures which relate to the introduction of a new strong landscape infrastructure which would not be designed to screen views towards the residential development but rather to soften views towards it and aid its integration into the local landscape. A denser planting belt is proposed to be established along the southern and south western boundary of the employment area as these types of building tend to be more visually incongruous in rural edge areas.

4.50 The Assessment suggests that once mitigation has matured, the proposed development will form a sensitive extension to Bradwell and a well-designed edge to the built form. Maturation of vegetation will take time and its continued maintenance is essential to its successful establishment.

4.51 Both the Highway Agency and County Council state that subject to appropriate conditions outline above regarding completion of dwellings, provision of the road and signalisation along with legal obligations regarding travel plans and provision of a bus service any adverse impact of the development on the highway network can be mitigated whilst contributing to the sustainability of the proposal..

4.52 The utility companies subject to comments above are supported of the proposal.

## **5. Conclusion**

5.1 This is a strategic development site allocated within the Publication Draft Core Strategy. There is an identified need for more housing in Great Yarmouth Borough and this proposal helps to meet both objectives and contributes positively to the 5-year land supply. In addition it helps to assure the development of the Link Road from the A143 to the A12 and potentially helps to open up the future development of other allocated land therefore helping to promote the long term development of the Beacon Park estate while taking pressure away from existing road systems.

5.2 The Environmental Statement and the response from consultees and indeed the developer (in terms of amendments to the Master Plan) have been accommodated and utilities infrastructure can accommodate the proposed level of development. There are no barriers to site delivery which will take approximately 15 years through a phased development approach. The scheme's first phase can be built and ready for occupation well within 5 years.

## **6. Section 106 Heads of Terms**

To mitigate the impacts of the development, the following Heads of Terms have been proposed:

- Affordable Housing;
- Highways and Public Transport;
- Education Facilities;
- Library Facilities;
- Fire Service;
- Sports and Recreation Facilities and Biodiversity Areas;
- Community Facilities; and
- Site for Health Facilities.

## **7.0 Recommendation**

7.1 The application is recommended for approval subject to the conditions referred to in the report and the Section 106 as necessary; it is considered compliant with the National Planning Policy Framework and emerging and current local plan providing a sustainable form of development, economic benefits and employment to the Borough.

7.2 Members should be aware that should the application be approved under the Town and Country Planning (Consultation) (England) Direction 2009, because of the size and location of the proposal it will need to be referred to the Secretary of State prior to any decision being issued because of the level of employment uses/office space proposed and the fact it is an EIA level application.

Background Papers: Planning File 06/13/0652/0F

5  
**Elaine Helsdon**

---

**From:** [REDACTED]  
**Sent:** 20 December 2013 06:28  
**To:** plan  
**Subject:** Planning Application 06/13/0652/O

Dear Mrs Helson:

I object to and respectfully ask you to re-consider the building of houses opposite the bungalows on Browston Corner on the land between Browston Lane and Beccles Road, and ask you to consider allowing bungalows instead which would be more in keeping with the area.

This is not only my view but that of my neighbours too.

Yours Sincerely

Roger Hayes  
1 Browston Corner  
Beccles Road  
Bradwell  
NR31 9DJ

S

**Elaine Helsdon**

---

**From:** Steve Carter [mailto:steve.carter@bt.com]  
**Sent:** 23 December 2013 22:37  
**To:** plan  
**Subject:** Application 06/13/0652/0 Full PP 150 houses

I would like to make the following objections to the above:-

- a) There should be NO "proposed link to Clay Lane" between buildings 45 & 46 (this is consistent with the existing limited access to the North of Clay Lane); note: contradiction between drawings.
- b) There should be fences at rears of buildings 13 & 31 thru 46 to protect the existing natural hedges (similar to those recently constructed to the East of Clay Lane).
- c) Whilst it is clear from the perspective that buildings 34 thru 39 are single story, it is not clear to me if buildings 31 thru 33 are also single story; if not I would like to object ( this is consistent with those recently constructed to the East of Clay Lane)
- d) The 'infiltration area' was originally designated as a lagoon (on the highways plan) - please confirm that this will still be a lagoon, otherwise I would like to object.

Please acknowledge receipt of this email (within the allotted time scale).

Steve Carter  


Owner of 1, Clay Lane, BRADWELL, NR31 9DH

Great Yarmouth Borough Council  
Customer Services

23 DEC 2013

Colindale  
1 Browston Corner  
Beccles Road  
Bradwell  
Gt Yarmouth  
Norfolk  
NR31 9DJ

19<sup>th</sup> December 2013

Planning Services  
Developmental Control  
Great Yarmouth Town Hall  
Hall Plain  
Gt Yarmouth  
Norfolk  
NR30 2QF

Dear Mrs E Helsdon

Your ref: Application 06/13/0652/O

I object to and respectfully ask you to re-consider the building of houses on the land between Browston Lane and Beccles Road, opposite the bungalows on Browston Corner. I ask you to consider allowing bungalows which would be more in keeping with the area.

This is not only my view but that of my neighbours too.

Yours Sincerely



Roger Hayes



06/13/0652/C S  
**Elaine Helsdon**

**From:** mark gray [mailto:mark.gray@persimmon.co.uk]  
**Sent:** 22 December 2013 20:16  
**To:** plan  
**Subject:** Planning Application - Wheatcroft Farm, Bradwell

Firstly I think it was wrong to give this limited amount of time to raise any objections which we may have. There were problems with accessing information on the website which I highlighted to you and for people without web access and working full time getting to the town hall between 9 and 5 is not easy. Also, considering the size of this proposed development, I think it was a very inappropriate time to expect people to comment on the proposals. This is the busiest time of year for most people, and I think that the time scale for comments should have been extended to take this into account, three weeks just is not long enough. This is a very emotive subject and one which the residents of Bradwell feel very strongly against.

I feel very strongly opposed to the future development in Bradwell especially due to the amount of dwellings involved. It is very difficult to accept the justification in the approval of this planning application considering the amount of brown field sites that are a constant eyesore in Great Yarmouth and will never be developed as they are in your words "not financially viable". These will never be financially viable compared to green field sites and so you will retain these sites that only adversely affect the image of the town and instead take the easy, cheaper option of building on green fields, losing valuable, high grade agricultural land forever.

My greatest concern, also shared by the majority of people at the first consultation in June 2013, is that the future development on the land next to my house on Meadowland Drive would have a detrimental effect on the increased traffic through the existing estate. It is therefore vitally important that the Persimmon plan has the roads in place to route this traffic (from Mr Kings future development) out onto the new bypass road to fully utilise this expensive road project. Any additional traffic through Meadowland Drive and Carraway Drive will cause misery for people trying to get off the estate on a daily basis. It is presently a very bad situation that no amount of "traffic modelling" can put right. Your Local Plan Core Strategy 2013 para 5.2.7 states "It is important that development contributes to improving the quality of life for the existing communities". This is achievable by ensuring that a road is included in this current planning application so any future development on the land next to Meadowland Drive is routed out to the new bypass, an option that I know has been put forward by Persimmon homes. It would be ludicrous to do anything but this, it utilises the new road and encourages people to head towards Yarmouth via Beacon Park rather than through Bradwell, encourages people to walk into Bradwell and most importantly lessens the negative impact on the existing community both with increased traffic congestion and also the financial implications of property devaluation especially on the perimeter dwellings.

The people most affected are the existing dwellings next to the future development such as mine on Meadowland Drive and your priority should be to minimise the impact of this development on the existing community (as stated in your core strategy). I have been told we will not be financially compensated for the devaluation of our property so it is your responsibility to "soften the blow" as much as you can. Simply leave this land out of the equation (140 homes), it will create a natural break between new and old development, the farmer will be still able to utilise this land, continue to provide a natural open space for people to enjoy, no increase in traffic congestion and most importantly no impact on existing dwellings both financially and visually. It will be as you first described it "an extension of Beacon Park rather than an extension of Bradwell."

Your leaflet you sent out with the planning application letter states that "effect of value on property" is irrelevant in reaching planning decisions, this is simply wrong no matter what the law says. I like most people have worked hard to pay for my home and it is wrong for my home to be devalued whereas developers profit at my expense. Don't turn Bradwell into a huge unattractive housing complex by building on green fields, you must not take the easy option but instead use alternative "not financially viable" sites that can only improve the community. Your decision is a huge responsibility that will impact massively on future generations living in Bradwell so please ensure you make the right one, not the easiest one.

Mr. D. Minns  
Planning Dept.  
GYBC



8  
Marbury  
Clay Lane  
Bradwell  
Gt. Yarmouth  
NR31 9DH

19 / 12 / 13

Dear Sir,

Re Planning Application 06/13/0652/0

I would like to place my objection to the proposed plan to build properties with their gardens butting up to the current boundary hedge. Our windows and living rooms are quite close to this boundary hedge, we think our outlook would be impaired, especially when you consider that the end of residents gardens are usually used for sheds and storage for any rubbish that they accumulate. We are also not convinced that any of the future residents would be will or able to upkeep the hedge on their side.

We attended presentations to the Parish Council and public consultation meetings organised by Bidwell the agents for this development. None of what was presented or promised bares any resemblance to the current plans submitted. The plans at the public consultation showed a 3 metre grass strip along the boundary hedge, then a road then properties. The agents informed us a maintenance company would be employed to maintain the south side of the hedge. In the light of events we had come to accept this proposal reluctantly. We are now totally vexed that the submitted plans bare no resemblance to the public consultation presentation. "What was the point?"

Our property is close to the boundary hedge, any fence our side would cause our living quarters to become quite dark. If the hedge has to stay which we are told by the experts that it must, we would request that the plans revert to what was presented at the public consultation. Alternatively we request a close boarded fence be erected to the south side of the hedge. This would give us privacy, security and peace of mind. We think this would not be detrimental to the hedge as it is on top of a four foot bank. We would then be responsible for its up keep on both sides, which we are willing to do as we have done for the last twenty years.

Yours sincerely

Mr. W. Morrow



Mr. D. Minns  
Planning Dept.  
GYBC



Marbury  
Clay Lane  
Bradwell  
Gt. Yarmouth  
NR31 9DH  
19 / 12 / 13

Dear Sir,

Re Planning Application 06/13/0652/0

I wish to register my objection to part of this plan.

We attended the consultation held earlier in the year at the Bradwell parish council office and studied the plans of phase one of this development.

The agent from Bidwells went to great lengths to explain that our boundary and the Hawthorn hedge would be separated from the development by a 3 meter grass verge and a service road. When questioned it was also explained that a contractor would maintain this verge.

The plans shown to us at this consultation have now been altered. The new version has omitted the grass verge and the service road and shows the development of 150 houses adjoining our property. Our bungalow is upsides this boundary. This gives us issues with privacy, being overlooked, noise and security.

Please could the road and verge be replaced as on the original plan? This would also provide better and safer access to the public bridleway that runs through Clay Lane and Wheatcroft Farm, as horse riders would not have to use the main Beccles Rd to access it.

Yours sincerely

A blacked-out redacted signature.

Mrs J. Morrow

- [illegible]

Bradwell 3 Primary - Hillside, Homefield and Woodlands							
	R	1	2	3	4	5	6
2014/15	113	104	104	106	84	97	101
2015/16	110	113	104	104	106	84	97
2016/17	101	110	113	104	104	106	84
2017/18	106	101	110	113	104	104	106
2018/19	105	106	101	110	113	104	104
2019/20	105	105	106	101	110	113	104
2020/21	105	105	105	106	101	110	113
2021/22	105	105	105	105	106	101	110
2022/23	105	105	105	105	105	106	101
2023/24	105	105	105	105	105	105	106

Peterhouse Primary							
	R	1	2	3	4	5	6
2014/15	39	36	47	44	41	44	51
2015/16	46	39	36	47	44	41	44
2016/17	47	46	39	36	47	44	41
2017/18	45	47	46	39	36	47	44
2018/19	46	45	47	46	39	36	47
2019/20	46	46	45	47	46	39	36
2020/21	46	46	46	45	47	46	39
2021/22	46	46	46	46	45	47	46
2022/23	46	46	46	46	46	45	47
2023/24	46	46	46	46	46	46	45

Cliff Park Infant							
	R	1	2	3	4	5	6
2014/15	73	68	67	78	50	63	76
2015/16	67	73	68	67	78	50	63
2016/17	66	67	73	68	67	78	50
2017/18	68	66	67	73	68	67	78
2018/19	67	68	66	67	73	68	67
2019/20	67	67	68	66	67	73	68
2020/21	67	67	67	68	66	67	73
2021/22	67	67	67	67	68	66	67
2022/23	67	67	67	67	67	68	66
2023/24	67	67	67	67	67	67	68

Herman Academy							
	R	1	2	3	4	5	6
2014/15	93	86	83	82	81	74	88
2015/16	91	93	86	83	82	81	74
2016/17	88	91	93	86	83	82	81
2017/18	90	88	91	93	86	83	82
2018/19	90	90	88	91	93	86	83
2019/20	90	90	90	88	91	93	86
2020/21	90	90	90	90	88	91	93
2021/22	90	90	90	90	90	88	91
2022/23	90	90	90	90	90	90	88
2023/24	90	90	90	90	90	90	90

