



PORINGLAND PARISH COUNCIL

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Clerk to the Council: Mrs Faye LeBon FdA

6th September 2019

Claire Curtis
Planning Department
South Norfolk Council
South Norfolk House
Cygnet Court
Long Stratton
Norwich
NR15 2XE

Dear Claire,

Objection to Planning Application 2019/1593

Outline planning application for the erection of up to 98 residential dwellings including 5 live/work units, structural planting and landscaping and a sustainable drainage system (SuDs) with a vehicular access point from Burgate Lane. All matters reserved except means of access.

Thank you for consulting us on the aforementioned application. Poringland Parish Council discussed the application at its meeting on 4th September and agreed unanimously to strongly object to the application, recommending refusal of the application on the following grounds:

- 1) **Necessity for Development:** The site lies outside the planning boundary for Poringland. As the Local Planning Authority has achieved a five year housing land supply, there is no reason for this speculative development which is contrary to Policy DM 1.3 (The sustainable location of new development).
- 2) **Vehicular Access to the Development:** The applicant proposes to change the priority of traffic on Burgate Lane. The priority traffic will be directed straight into the development, with through-traffic towards Alington and Yelverton being proposed to turn left away from the new development. Poringland Parish Council objects to priority traffic going to a housing estate and ultimately a dead end, and through-traffic being forced to turn off. The through-traffic consists of numerous vehicles, and not just domestic vehicles but commercial ones, including large agricultural vehicles. These vehicles will be substantially impacted by the proposed 'throttle point' and it will hold up large emergency vehicles such as fire engines. To force through-traffic to turn off to essentially continue along a through-road is a farcical suggestion and can only have been proposed by the applicant to benefit their development with no consideration for the detriment to other users of this road.

Vehicles travelling away from the development is also of concern as the Burgate Lane junction with Upgate/Hall Road has limited visibility and cannot be improved due to the land which could be used for a wider visibility splay being in private ownership. Traffic from the new development will be trying to exit Burgate Lane via this junction. At peak time this will be an excessive amount of traffic trying to exit at this junction resulting in traffic queues and the inevitable build up of pollution. Upgate/Hall Road are very busy highways due to the ability to use them as 'rat run' to avoid the congested B1332.

- 3) **Surface Water Drainage:** We are grateful to the applicant making reference to the Poringland Integrated Urban Drainage Study. However, they make reference to Report Reference 8807/02/SH/0108/2041. We would like to draw attention to the applicant that the report has since been updated, and the report they should be referring to is Report Number 8807/02/SH/05-08/2237. Section 1.3 of this report states:

“this report follows on from our previous Report No. 8807/02/SH/01-08/2041.....”

The applicant has referred to a completely outdated report and therefore all of their references in table 6.1 to the Poringland Integrated Urban Drainage Study are nonsensical. As they have not applied their application to the correct report, there is no proof of compliance, so any reference to such compliance with the Poringland Integrated Urban Drainage Study should be disregarded.

Aside from this glaring error, the references made by the applicant to the 'dry ditch' must also be disregarded, as this ditch is rarely dry. Surface water from White House Gardens enters this ditch via a drainage pipe. Similarly, surface water from Brooks Meadow and run-off from the proposed site, which is currently an arable field, also enters this ditch. If the arable field becomes an urban surface, this will exacerbate the amount of surface water entering this ditch.

As detailed in the correct version of the Poringland Integrated Urban Drainage Study, the proposed site is bisected by watercourses which are an important part of the drainage system to the village as a whole, not just the site. This same study details the historic flooding in the village being caused by infilling of field drainage systems. In addition to this, the geology of the village, identified as being sand and gravel over chalky boulder clay, has created a perched water table of differing heights across the parish. This means that local percolation tests are limited evidence of the site's ability to drain surface water. The water percolates through the sand and gravel layer and becomes trapped at the layer of boulder clay. The water then travels along this boundary until it finds another means of escape, which tends to result in the flooding of another area of the village.

It was also noted that the applicant proposes an attenuation pond to the south east of the development site. The applicant also proposes a children's play area to the south of the development site, close to the attenuation pond. The Parish Council is gravely concerned about having an area where children are encouraged to play, so close to an area that would be of great danger to children.

With further reference to the attenuation pond, the applicant is silent on how the attenuation basin will clear. Due to the geology of the area, as previously described, there should be no assumption of simple slow percolation.

- 4) **Biodiversity:** The applicant advises that there will be a 'net biodiversity gain' as a result of their development. The Parish Council strenuously objects to this statement. The applicant proposes to remove part of a valued hedgerow, protected because of evidence of it being shown on the 18th Century Tithe Maps. The applicant proposes to replace this valued 300 year old hedgerow with new hedgerows. This is not acceptable to the Parish Council.

Poringland Parish Council also questions the bat survey that has been presented as evidence for the lack of impact the development will have on wildlife. The survey counted 65 bat movements and advised that the nearest bat movement was 160 metres from the site. However, a survey commissioned by a neighbouring property, only 65 metres from the site boundary, recorded in excess of 1,700 bat movements. Whilst we appreciate that wildlife movement will be different on different days, the difference between these two figures is enough to call into question the accuracy of the applicant's recordings.

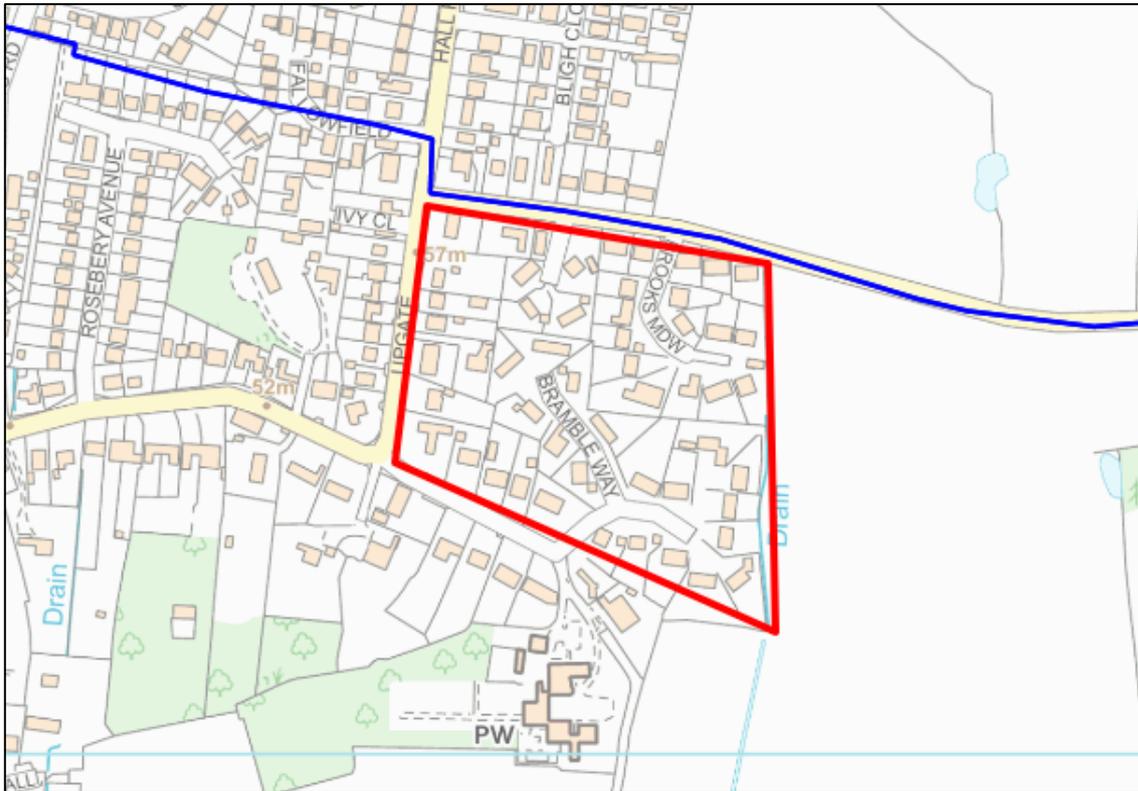
- 5) **Location of Site:** The site lies to the south of Poringland. Poringland Parish Council has expressed the wish for any new development to be situated to the north of the parish. This has been written into the emerging Poringland Neighbourhood Plan which, as at the date of this response, is nearing the end of the Regulation 16 consultation. The Neighbourhood Plan is therefore a significant way through the planning policy process and the policies in the plan should be respected by the applicant. The Parish Council, with the support of the local community, wished for any new developments to be to the north of the parish to prevent exacerbation of traffic moving through the village on already congested roads during busy periods (eg: towards Norwich in the mornings and towards Bungay in the early evenings). The emerging Neighbourhood Plan is not resistant to development, it is just conscious that new development should be in the right place for not only existing residents, but for residents of any new development.
- 6) **Community Engagement:** The applicant's Statement of Community Involvement (SCI) is truly disappointing. Para 2.2 of the SCI advises

'Gladman wrote to Poringland Parish Council with details of the proposed consultation, including copies of the consultation leaflet and copy of the Development Framework on 23rd October.'

Let us be very clear, that the applicant wrote to Poringland Parish Council on 23rd October **2017** about a different application (which was subsequently refused by the Local Planning Authority). Poringland Parish Council knew nothing of this application until we were advised by the Local Planning Authority as part of the consultation process.

- 7) **Density of Development:** The applicant proposes a density of 28 dwellings per hectare, which the applicant advises *'is considered to be a suitable average density given the site's*

urban edge location'. This area in the parish of Poringland is certainly not 'urban' and this density is far from in keeping with the neighbouring properties. The below plan shows the neighbouring area to the site. There are 52 properties in this area, which measures 4.6ha.



This equates to a density of 11 properties per hectare. The proposal is therefore out of character to its location, from a density perspective.

- 8) **Sustainable Transport:** Pedestrian access from the site to services in the village will involve walking along unlit roads with no pavements. This is unacceptable from a safety perspective, particularly for children walking to and from school, and those with limited mobility. The applicant proposes an alternative pedestrian route via an unmade pathway within the southern boundary of the site. However, this is likely to be waterlogged for much of the year, and there are no specifications available as to its accessibility for those with disabilities. Any proposals to urbanise the area off site to include new street lighting will be resisted. This is in line with the emerging Neighbourhood Plan policy to minimise loss of dark skies.

The applicant has made reference to the regularity of the bus service, however they have only considered the services that run directly through the centre of Poringland, and not the services that run to the bus stop closest to the site. The services that run closest to the site have recently been cut by two services per day. This has had a great impact already on residents in the vicinity, and leaves the area vulnerable to further cuts.

With a limited bus service from this site and difficult walking routes, the site favours use of the private car as the preferred method of transport. This is not sustainable from an environmental perspective, and will leave those without access to a private vehicle

isolated. At a time when the causes climate change need to be urgently addressed, a development that encourages car usage should not be considered.

- 9) **Impact on Local Services:** Poringland has this year reached crisis point in its school intake. In September 2019, 28 reception age children in Poringland were unable to secure a place in Poringland Primary school. At Framingham Earl High School, years 7 and 8 are currently at capacity. There remains numerous areas in the village with planning permission where dwellings have yet to be constructed. These properties will put yet more strain on school places. Further development cannot be considered on top of this.

The Parish Council is also concerned about the impact of the proposed development on local healthcare services. We are grateful to The Norfolk and Waveney Health and Care Partnership for providing more detailed information on the impact of this development in their response dated 28th August 2019

- 10) **Type of Housing:** The applicant proposes 5no. 'Live/Work Units' but gives no further details. What usage class of business will be permissible for these units? How much traffic will they generate? Or is this just a normal dwelling with a spare room that can be used to work from home which the applicant is using to try to fulfil an obligation to increase commercial opportunities in the village?

- 11) **Contribution to Affordable Housing:** Whilst we are grateful to the applicant for considering an extra contribution to affordable housing, this should not be used as a reason for granting planning permission. Developers in the form of Norfolk Homes, Badger, Big Sky, David Wilson Homes, Charles Church/Persimmon and Bennett Homes have already contributed in excess of 300 affordable homes in the local area. And of course the applicant still has time to decide that in fact the extra three dwellings, or indeed any of the affordable housing contribution, may not be viable to their business.

To conclude, Poringland Parish Council strongly recommends refusal of this application as a development that lacks any form of sustainability or benefit to the local community.

If you would like any further clarification of the above points, please do not hesitate to contact me.

Yours sincerely,

Mrs Faye LeBon
Clerk to Poringland Parish Council