

Drayton Parish Council Response to Planning Application 20161066

Drayton Parish Council objects to the planning application 20161066 for up to **250** dwellings, but would support the application if the dwelling numbers were limited to **200** for the following reasons:

When you go through the timeline of the application consideration should be given to the following points:

Representatives from Drayton Parish Council (DPC) had a meeting with the landowner on 3 March 2016 where they were informed that the previous planning application for 200 dwellings was going to be resubmitted, like for like, nothing had changed, the delay had been simply due to choosing a preferred developer. Many residents contacting the Parish Council, whilst accepting that no development on the site is an unrealistic expectation, permission for 200 homes in a quality development is acceptable.

The date of the pre- application advice from Broadland District Council (BDC) is stated as being given on 14 April 2016.

In the Flood Risk Assessment & Drainage Strategy document part 1 it clearly states that as part of pre application discussions with the Planning Authority the developer has been encouraged to consider applying for up to 250 dwellings on site as the current density is considered low.

It is not disputed that the density per hectare is low; it is the impact on the village, infrastructure, flood risk and the residents of up to 50 additional dwellings that is the concern.

At the BDC council meeting held on 21 April 2016 it was resolved to approve BDC site allocation document DPD which shows DRA1 with an application of up to 200 dwellings. This document was adopted by BDC on 3 May 2016.

In the Planning Inspector's report into the BDC site allocation development plan document by Inspector Louise Crosby, a question was asked if there is a need for a buffer in housing numbers. The response indicates that a buffer in housing numbers does exist and a larger buffer would potentially result in the creation of a materially greater number of dwellings than had been tested in the Joint Core Strategy (JCS).

The above extracted comments appear to suggest that the up to additional 50 dwellings were proposed by BDC and not the developer and that as a buffer is included in the site allocation Development Plan Documents (DPD) a larger number of dwellings on this site is unnecessary.

It is somewhat surprising that an increase in numbers for DRA1 was being promoted by the Planning Authority before the date of the Council meeting which then gave

approval for up to 200 dwellings and not the increased number. It has also worth noting that the indicative plan shows that the additional dwellings were only added to the plan on 18 May 2016; this again is surprising as it would have been presumed an indicative plan would have been presented to the Planning Authority on 14 April 2016 if the increase in dwellings was developer led.

It is unfortunate that the documents accompanying the application have not been updated and it would have given greater clarity if the application had not been submitted until after the correct figures, especially regarding flooding and foul drainage issues had been produced.

In the Flood Risk & Drainage Strategy document part 2 some of the figures are clearly incorrect.

The Developer Impact Assessment Report from Anglian Water still shows the development as 2 separate sites and for only 185 properties and not one combined site for 200 dwellings let alone more, and the figures shown for 'creep' are clearly based on 185 properties.

The Pre-Assessment report also from Anglian Water and dated 29 April 2016 shows the number of units as 200.

Returning to the site density issue, which is the reason given for increasing the application from 200 to 250 dwellings other sites in the Norwich Policy Area (NPA) approved Site Allocation DPD must be looked at:

TSA2. Pinebanks, Thorpe St Andrew. Number of dwellings 231, site area 16.1 ha, density per ha=**14.35**

BLO2. Blofield. Number of dwellings 22, site area 1.4ha, density per ha =**15.71**

DRA1 Number of dwellings 200, site area 12.5ha, density per ha=16.

Even with the 200 dwellings the density is still higher per ha than the 2 examples shown from the BDC Site Allocation DPD.

The majority of the proposed development area is in one of the 3 critical drainage areas in the Norwich Urban Area Surface Water Management Plan, there is no other development proposed in the BDC Site Allocation DPD that is in a critical drainage area therefore extra protection measures must be afforded to this area by not unnecessarily increasing the density in a critical drainage area.

As flooding and foul sewage drainage are two of the major concerns for residents and DPC it would have been better to have delayed submitting the planning application until the updated information was provided so responses to the application could have been based on correct figures.

The capacity at the doctors surgery is the major concern as the proposed development will exacerbate an existing problem. The parking on Manor Farm Close is quite simply dangerous most days (photos attached) and although the developer is not required to address the current problem, it must not be made worse by the development. There are numerous occasions when cars are parked partly on the footpath and people going to the surgery either in a motorbility scooter, wheelchair or pushing a pram cannot get passed without going into the road and there have been several near miss incidents.

Since the date of the previous planning application (20130885) the Medical Practice which also has a surgery in St Faiths in its practice group has taken on the surgery and patients from Horsford. Normally in a planning application other proposed housing developments cannot be taken into account when determining a planning application, however, if developments are in the BDC site allocation DPD which has been adopted, they can become a material consideration and taken into account. There are 2 sites in the adopted site allocation DPD in Horsford and one in Newton St Faiths which are all within the surgery patient area.

HOR1 for 63 dwellings

HOR2 for 125 dwellings

HNF for approx 60 houses.

The total number for these 3 allocated sites is 248 dwellings so along with the Drayton application it makes a proposed total of 498 new properties which the surgery in Drayton, being the main one will be unable to cope with unless it is given significant more land than is proposed in this application for both car parking and building expansion. If this addition land is not provided the medical practice may have to consider relocating which would be a major concern and be very detrimental to the residents of Drayton, a footpath through to the new development from the surgery is also essential.

Separately, another outline planning application has been submitted for 29 dwellings in Drayton and very shortly a public consultation is to be held to consider a further 74 dwellings in Drayton.

We accept that these two new proposals are not in the site allocation DPD and cannot be considered in conjunction with this application but it will mean if these applications are built out the total number of new properties in the Surgery catchment area will be 601.

We understand from the developer's agent that proposals are being considered to double the land given to the surgery. The Parish Council welcomes this addition and seek reassurance that this is a condition attached to any planning permission granted.

The Parish Council has also been made aware that the proposed dwelling number of 250 will increase the **deficit** in places at Drayton Infant school to 42 and increase the **deficit** in places at the Middle School to 66 according to LEA figures, this is another major concern should the application be approved.

The Parish Council has serious concerns regarding the proposals for the surface water and foul sewage drainage proposals. Although the Parish Council understands the measures being proposed, it is far from convinced that the measures are sufficient without stringent control, maintenance and monitoring.

Significant drops in land levels from 33 metres(AOD) at the top of site North West corner down to 23 metres at the bottom South East corner and even lower still to between 10-13 metres (3 different measurement levels are shown in the documentation) at the South West corner.

In the Flood Risk Assessment & Drainage Strategy document part1, part 5.3 offsite Surface Water Drainage Strategy.

Points 5.33 and 5.34 mention the detailed designs of the lagoon and ditches and states that they both have to accommodate a 1 in 100 storm event plus an allowance of 20% for climate change, however, new guidelines from September 2016 say that an allowance of 40% should be made for climate change.

This is also mentioned in the Design and Access statement, point 9.6 on page 29, which states that the lagoons will provide sufficient capacity for the 1 in 100 year design storm with an allowance for climate change. To comply with the current guidelines DPC would therefore require that the lagoon capacity is increased to 23,333 m³ from the current proposed 20000m³, which then covers the additional 20% climate change guidelines.

DPC also has concern with the positioning of the lagoon as there is no provision shown for offsite overland flows South of the lagoon(SUDS) at the land high point of 23 metres (AOD)before the land drops to the low point of 10-13 metres. The Parish Council would therefore request that either an intercept ditch is provided in this area to drain into the lagoon or a dense tree belt is planted and the properties shown at the South West corner of the site adjoining Hall Lane are not built as shown on the indicative plan to allow a larger extreme event catchment area to avoid surface water runoff towards the village centre which is the natural flow path.

DPC also has concerns with comments in the Contamination Report, part 1.

Section1.Chalk-Related Subsidence Risk Assessment

The presence of chalk at relatively shallow depths beneath the site indicates that the possibility of subsidence, related to shallow holes and other chalk solutions or manmade cavities should be considered and that the site appears to fall into the

moderately high subsidence risk category. Therefore, DPC request that further investigations should take place before any development is granted permission.

Drayton Parish Council therefore requests that if approval is to be given to this planning application it should be restricted to approval for a maximum of **200** dwellings as per the previous approved application (20130885), which will provide the required number of dwellings as required in Drayton (DRA1) in the approved Site Allocation DPD.

Finally, DPC would wish to see the UK Power Networks pole mounted transformer at the junction of Hall Lane and School Road moved to ground level or moved to another location as it is felt, if it was left it would be an eye sore at the entrance to the new development and will spoil the 'open village feel' approach.

Drayton Parish Council has submitted a separate document outlining requirements for S106 and planning conditions.

Jonathan Hall

Clerk to the Council

25.8.16

Planning Application 20161066

S106 / planning condition requirements.

This development is significantly large for a village the size of Drayton. If approved it will have a significant impact on its residents and the infrastructure, therefore a significant contribution must be made for the benefit of the village and its inhabitants.

Drayton Parish Council would wish for the following requirements to be included in the Heads of Term for S106 agreement and/or planning conditions for the above numbered planning application:

- In the previous similar planning application 20130885 for 200 dwellings there was to be an offsite play area S106 contribution requirement of £16000. The Parish Council requests this amount to be uplifted by the RPI inflation rate since this application was approved, also to be directly proportionally increased if the application is approved for a number larger than 200 dwellings.
- The allotment area to be fenced (with suitable fencing), with pathways as appropriate, also an adequate water supply to insulated stand pipes and taps to be provided.
- The allotment car park area to be fenced, tarmaced and spaces to be white lined in accordance with current short stay parking bay standards.
- A reasonable contribution to the Drayton Middle School swimming pool refurbishment project.
- A reasonable contribution to the St. Margaret's Church Hall refurbishment Project.
- A provision of additional land, over and above what was agreed in the 20130885 planning application, to meet the requirements of Drayton Medical Practice so they can adequately address the development pressures. This area to be fenced with a footpath through to the new development and the area required by the surgery for additional parking to be tarmaced and white lined in accordance with current short stay parking bay standards, other space to be provided for possible building extension.
- 'SUDS (Lagoons) schemes require much more maintenance than traditional drainage piped system and as such it is imperative that a suitable regime is established to ensure that they function in the way they are designed to.'
- Drayton Parish Council, therefore, requests a condition to be attached to any planning approval regarding the maintenance of the intercept ditch and the lagoon. It need to be clear who will be responsible for the maintenance of both

with a checkable maintenance schedule to ensure the ditch is kept clear and the lagoon is kept free from pollutants.

- If these checks and maintenance measures are not put into place, the proposed measure to alleviate the flooding problems in Drayton will conversely make it worse.
- Full CIL payment for the latest amount set by the District Council.
- A reasonable contribution (in addition to any CIL payment, which will not sufficiently cover such) for the much needed improvements to the footpaths, parking and flooding problems in the village centre, to which this development will seriously affect.
- A fair contribution to improved transport links, such as the local bus service (i.e. pram crossings, bus shelters etc), traffic calming, safe crossings for pedestrians etc.
- Any specifications for the above requirements to be agreed by Broadland District Council in conjunction with the Parish Council.
- To meet Policy EN3-Green Infrastructure requirements, the Parish Council requests a highways standard footpath on the East side of School Road from the point of the new road access into the development on School Road through to Reepham Road, therefore linking up with the identified NDR overbridge on Bell Farm Track and onto Drayton Drewrery. This should also include an improved entrance to Longdale Park where currently there is no path.
- To provide additional landscape screening (which could also be considered as soft SuDS) along the northern boundary of the site. The screening should be planted to ensure that the drainage scheme (ditch) is protected from any root zone which runs along the same boundary.