

Application Reference PO/18/2169 - Land at Pine Tree Farm Norwich Road Cromer – Schedule of Consultation Responses

Hybrid application comprising: Outline planning permission (with all matters except for access reserved for future determination) for up to 300 dwellings to include a new roundabout and access onto A149 and associated infrastructure and Full Planning permission for provision of a new football club comprising the creation of football pitches (together with associated fencing and floodlighting), erection of clubhouse, changing facilities, new access road and formation of car park to facilitate the relocation of Cromer Town Football Club

Consultee	Date	Support/Object	Summary of Comments
Norfolk and Waveney Sustainability and Transformation Partnership (STP)	18/04/19	Comments	<ul style="list-style-type: none"> - Requires a contribution of £113,500.
Sport England	24/04/19	Supports	<ul style="list-style-type: none"> - Supports the application because of the provision of new football pitches.
Minerals and Waste	24/04/19	Objects	<ul style="list-style-type: none"> - The County Council in its capacity as the Mineral Planning Authority (MPA) objects to the planning application unless: <ol style="list-style-type: none"> 1. the applicant carries out investigations/assessment including testing to confirm the viability of the resource for mineral extraction, and 2. If the mineral resource is proved to be viable, the applicant considers how it could be extracted prior to development taking place through a Materials Management Plan-Minerals, to ascertain the quantities of aggregate which could be obtained from groundworks, sustainable drainage systems etc., and then reused in the construction phase of the scheme.
Economic Growth Team	24/04/19	Supports	<ul style="list-style-type: none"> - The Economic Growth Team recognised that the scheme would bring several economic benefits to Cromer and its community.
Cromer Town Council	29/04/19	Comments	<ul style="list-style-type: none"> - CTC objected to the location of the proposed toucan crossing, which they felt was too close to the rail bridge on the A149 to the north, - They objected to the reduced width carriageway to enable a widening of the footway over the bridge on the A149 to the north, - They were concerned that the A149 junction with Station Road, Cromer is not a suitable or viable crossing point capable of accommodating increased pedestrian footfall to the north of the development, toward the town centre and schools. - They were concerned that the development is relatively remote from the town, - There were concerns around the viability and sufficiency of the estate travel plan, - There were concerns at the validity of the observations and data supplied within transport assessments, as some of this work was felt to have been carried out during times of the year when Cromer experiences less traffic movements, - Proposed that should be a continuous 30mph zone along the A149, - They wanted further details on how the proposal will encourage cycling at Reserved Matters stage, - They strongly objected to the location of the proposed access to the development at the south, which would result in the loss of a mature oak tree presumed to be viable habitat contributing to both biodiversity and the tributary farmland landscape character, - There were concerns regarding impact on schools, doctors, hospital and care provision and the increased traffic on Norwich Road, which would need to be addressed in the proposal.
Strategic Housing	01/05/19	Objects	<ul style="list-style-type: none"> - Raised that the applicant did not propose delivering 45% of the homes (H02 – Core Strategy) as affordable homes. The proposal was for 25% affordable, based on a viability assessment and residual land value. Though they are objecting, Strategic Housing did concede they would address the viability assessment in more detail. - They felt that the indicative scheme mix for the whole development did not appear to be compliant with the requirements of policy H01, that 40% of the homes have two or less bedrooms and 20% of the homes are suitable for or easily adaptable to meet the needs of the elderly, infirm or disabled. The proposed mix for 301 dwellings included 82 one or two bed dwellings (27%) with the remaining 72% being three, four and five bed homes.
LLFA	03/05/19	Objects	<ul style="list-style-type: none"> - The LLFA objected to the application in the absence of an acceptable FRA relating to:

			<ul style="list-style-type: none"> • <i>'Insufficient information has been provided to demonstrate that surface water can be managed on the site and discharged to the ground via infiltration without resulting in an increase in the risk of flooding to the site or elsewhere. An alternative method of drainage has not been provided should infiltration rates prove to be unfavourable. Hence the site has not demonstrated that there is an achievable surface water drainage proposal for this application.</i> • <i>Insufficient evidence has been provided to demonstrate there is a feasible drainage strategy in place for the management of surface water runoff from the proposed site access roads.</i> • <i>Insufficient information relating to the surface material of the proposed sports pitches in the south of the site. Should materials other than grass be proposed, a drainage strategy would be required for this area given the identified risk of flooding in this location.'</i>
Norfolk Coast Partnership	03/05/19	Objects	<p>The Norfolk Coast Partnership objects to the application:</p> <ul style="list-style-type: none"> - They felt that the landscape impact on the AONB would be significant, and the attempts to mitigate through screening would not soften the impact. - They claimed that Anglian Water would not have the capacity to take a development of this scale. - They objected to the site's location outside of the development boundary on greenfield land in the AONB, thus not being sustainable growth, - They felt that development contravened policy EN1 as development could be considered elsewhere, EN2 as it will have impact on settlement character, and PB3 of the AONB management plan as it would impact special qualities of the AONB.
Public Rights of Way	03/05/19	Objects	<ul style="list-style-type: none"> - PROW objected to the scheme on grounds of the applicant not addressing a PROW (Northrepps Road 16). To overcome the objection, they required information demonstrating how the PROW is to be incorporated into the development.
Norfolk County Council	03/05/19	Comments	<ul style="list-style-type: none"> - Outlined necessary contributions to be made to education, fire service, libraries, and the environment.
Natural England	22/05/19	Objects	<p>Natural England objects to the development for the following reasons:</p> <ul style="list-style-type: none"> - The proposed development was felt to significantly impact the special qualities of the Norfolk Coast Area of Outstanding Natural Beauty (AONB) - The proposal was contrary to local plan policy, was thought to fail to pass the exceptional circumstances text of the NPPF (para 172) and did not support the objectives set out in the AONB Management Plan.
Highways Authority	31/05/19	Objects	<p>The Highways Authority felt that the information provided at the time was incomplete, and therefore submitted a holding objection. The following was raised:</p> <ul style="list-style-type: none"> - There were concerns around the proposed roundabout at the southern access, which as it was appeared to limit visibility between the accesses of properties to the north and northern roundabout exit. - The proposed footway widening at the east side of Norwich Road appeared to require land outside of the highway boundary and outside of the applicant's control. - The Transport Assessment footway width (1.8m) for the railway bridge north of the site was different to a different drawing which shows it as 1.5m. - The highway layout was felt to need to include a road to the western boundary of the site to enable onward connection to Rougton Road. - The traffic data did not consider the seasonal variability of Cromer,
	10/10/19	Objects	<ul style="list-style-type: none"> - The Highways Authority continue to have significant concerns as previously raised above. A particular concern is the proposed roundabout at the southern access, as previously mentioned, which they believe is unsolvable.
NCC Historic Environment Science	10/06/19	Conditions	<p>The Officer felt that the site had significant archaeological potential. As a result, the following conditions were proposed:</p> <p><i>A) No development shall take place 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 and 6) Nomination of a competent person or persons/organization to undertake the works set out within the written scheme of investigation. and,</i></p>

			<p>B) No development shall take place other than in accordance with the written scheme of investigation approved under condition (A). and,</p> <p>C) 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 scheme of investigation approved under condition (A) and the provision to be made for analysis, publication and dissemination of results and archive deposition has been secured.</p>
Network Rail	13/06/19	Comments	<ul style="list-style-type: none"> - Required clarification regarding the bridge across the railway on which the proposed footpath widening is to take place. The location plan for the application indicates it is owned by the applicant however their records showed that Network Rail own the land adjacent to the bridge.
	17/06/19	Conditions	<p>Following the clarification they sought above, Network Rail returned with a second response with the following comments:</p> <p><i>'The developer must ensure that their proposal, both during construction and after completion of works on site, does not:</i></p> <ul style="list-style-type: none"> - <i>encroach onto Network Rail land,</i> - <i>affect the safety, operation or integrity of the company's railway and its infrastructure,</i> - <i>undermine its support zone,</i> - <i>damage the company's infrastructure,</i> - <i>place additional load on cuttings,</i> - <i>adversely affect any railway land or structure,</i> - <i>over-sail or encroach upon the airspace of any Network Rail land,</i> - <i>cause to obstruct or interfere with any works or proposed works or Network, Rail development both now and in the future.'</i>
Landscape Officer	28/06/19	Objects	<ul style="list-style-type: none"> - They felt that the landscape around Cromer is constrained by the AONB, where in para 172 of the NPPF, the application should be refused unless 'exceptional circumstances' are justified. The most significant issues relating to the AONB were said to be lighting, highways proposals leading to urbanisation of the AONB, and increased visitor pressure, particularly on the Overstrand Cliffs SPA. - The layout proposes all housing to the north of the site and the sports facilities in the southern section. The 6 sports pitches, clubhouse, parking facilities and required lighting levels are the element of the proposals that will incur the most significant landscape and visual impact. It was felt to be unfortunate that they have been located in the southern section where they will not benefit from the mature woodland screening of Beckett's Plantation and the woodland belt across the centre of the site. It was also felt that there is a lack of effective pedestrian and cycle linkage north from the site through to the town. - The scheme was felt to have a major landscape impact. Several key environmental assets were highlighted, including the Tributary Farmland Area as defined in the AONB integrated landscape character guidance. - A number of valuable trees would also be required to be removed. - Much of the development is in Grade 2 agricultural land, which was criticised.
	11/09/19	Objects	<ul style="list-style-type: none"> - The updated assessment did not demonstrate that the concerns in their previous response could be mitigated.
	02/10/19	Objects	<ul style="list-style-type: none"> - Updated surveys had been carried out, but these showed the presence of endangered bats and several species of bird, which the need to mitigate for was stressed, - Reiterated concerns for the effect on Becketts Plantation, - Acknowledged the variation to the scheme which would save several valuable trees, but criticised the removal of a valuable Oak Tree, - Maintained policy compliance issues EN9, AONB, - The applicant suggested minor negative impact on biodiversity on ecological receptors. However, the Landscape Officer was not convinced, due to disrupting noise and activity from the sports pitches and the additional 700 people and the schemes location in the AONB, in close proximity to Becketts Plantation, which has failed to be mitigated for.

	24/10/19	Objects	<ul style="list-style-type: none"> - Recommended that additional information is needed for HRA: <p><i>The HRA Supporting Evidence document (Wild Frontier Ecology, March 2019) does not contain sufficient information in order for the LPA to undertake a robust Habitats Regulations Assessment, including an Appropriate Assessment, (as required by Natural England in their letter dated 22nd May 2019) of the implications of the development on European designated (Natura 2000) sites.</i></p>
Environmental Health	31/07/19	Objects	<ul style="list-style-type: none"> - The Officer had concerns in the absence of detail in terms of noise calculations to confirm the noise impacts on transport noise and particularly, playing field noise. Very little results have been presented. - Regarding noise impact on residential dwellings, it was felt that the assessed noise levels on site in terms the noise criteria in BS88233:2014 and World Health Organisation standards have not been provided in any detail and calculation or Sound Plan noise mapping from the sports pitches was not presented. Furthermore, additional details on specification of glazing and passive ventilation, standard glazing to be recommended and numerical calculations and justifications were required.
	02/10/19	Comments	<ul style="list-style-type: none"> - Required further clarification on the days that the sports pitches will be in use. There is also concerns that this would result in floodlighting well into the evening. More information is required. - Further information is also required on noise from sports pitches and noise impact on sensitive dwellings, as raised above.
Conservation and Design	23/08/19	Objects	<ul style="list-style-type: none"> - The Officer felt that the development would have an adverse impact on the rural character and appearance of this area of AONB as well as resulting in less than substantial harm to a designated heritage asset. From a design perspective, the lack of connectivity and failure to secure a sustainable movement hierarchy means the proposal fails to comply with the emerging design guide. On balance, C&D consider that further design iterations are required to address the above concerns before a more positive view on acceptability in principle can be reached.