

Joint Letter from: Easton, Marlingford & Colton Parish Councils

Mr Rooke
Broadland District Council
Planning Department
Thorpe Lodge,
1 Yarmouth Road,
Norwich, NR7 0DU

24 August 2018

Dear Mr. Rooke,

Food Hub, Honingham: Planning Application ref 20181177 - Discharge of Condition 2.20

We note the advice that you have received from your solicitor, which you kindly shared with us, considered that you have no statutory duty to consult Parish Councils concerning this submission.

Whilst we are confident that both Broadland and NCC, as the Local Highways Authority, will professionally review the details of the application, we are concerned that the issues raised by Easton Parish Council dated 23rd July 2018 remain unanswered. We feel obliged to formally notify you of our opinion that in terms of process and detail the submission is so inadequate that it must be dismissed.

For clarity we list our general concerns.

1. The s106 agreement with the land owner restricts access to the LDO to a route from the Easton roundabout via Church Lane and Red Barn Lane. This submission restricts upgrading to Church Lane only. If it is the intention to restrict all access to the site to a single entry/egress position specifically not using Red Barn Lane, we suggest a revised S106 is required. Alternatively, should the developer wish to use another entrance either for construction purposes or an additional entrance, suitable upgrades must be considered for Red Barn Lane. The application 20181336 for the surface water lagoon and heavy engineering to the western boundary of the LDO site will add to the burden of HGVs using both Church Lane and Red Barn Lane, reinforcing the need for road improvements to the full length of the s106 route.
2. The agreement covers both construction and occupation. The timing of the various works under condition 2.20 is covered by condition 2.21. We do not consider these two conditions can be dealt with separately.

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3. Information provided within various submissions concerning these works suggests that the applicant considers the proposals are temporary in nature on the assumption that a permanent direct access from the A47 will replace this route. This is by no means certain and the section 278 works must be considered as the permanent permitted access solution to the LDO site. If and when definitive proposals and timescales for the A47 become certain, revisions and downgrades to these proposals may be considered appropriate as dictated by the agreed timing of the works under condition 2.21.

4. We do not understand the applicant's reference to partial approval in the application.

5. Of the six elements under condition 2.20, the first two, "Realignment/change of priority at the junction of Dereham Road/Church Lane" and "A right turn lane from Dereham Road into Church Lane" are alleged as not necessary at this time due to the modest traffic movements. The applicant does not evidence the reasoning or changes which underline this statement. The intention of condition 2.20 is for the design to reflect the full capacity and total traffic usage for the DO site. Any phasing of the highway works to suit the occupation phasing is a matter for condition 2.21. It is understood that the reference to modest traffic movements relates to the proposal for a Milling Plant as the first occupant. This is irrelevant to condition 2.20 which should address full occupancy and site construction traffic, which is likely to be extensive from day one.

6. Element six, the closure of Blind Lane is alleged as not necessary at this time due to the uncertainty of the proposed A47 dualling works. Again this can only be considered if and when definitive proposals for the A47 and timescales become certain. In the interim the situation as assessed by NCC at the time of the LDO consultation remains.

7. What is the precedent for passing bays on a permitted HGV route? We consider that the precedent is for a 6.5m wide carriageway established under planning application 20050708 for the adopted length of Grange Lane in the access to Honingham Thorpe Farm. This historic application noted the intention of this new road was a more direct access to the Easton roundabout (and A47) for farm traffic including caterpillar tractors, combined harvesters, sugar beet lorries and potato lorries, from Honingham Thorpe Farm. The LDO site will add to this volume of HGV traffic which is not given any consideration in this S278 design nor appears to have been considered in the original EIA Screening Opinion for the LDO.

8. A 1.5m wide trod is inadequate as the solution to pedestrian and cycling access to the site. The precedent of a 3m wide trod is established by South Norfolk in the details for the 890 homes at Easton. The proposed 1.5m width does not even allow for cyclists passing. The minimum width recommended by Sustrans Handbook for Cycle Friendly Design is 2.5m to allow cyclists to safely pass. With the shared

pedestrian usage, we support South Norfolk in its requirement for 3m wide pathways.

9. The trod simply stops at the junction of the new site entrance and there are no details how pedestrian and cycle access within the development to individual plots is to be effected. The proposals are simply paying lip service to the provisions of the NCC Walking and Cycling Strategy which promotes encouraging people to walk and cycle under planning as its statement “New developments, both housing and employment, provide the opportunity to create attractive environments and to build in coherent, convenient and safe links for walking and cycling.”

10. Notwithstanding our concerns regarding the inadequacy of a series of passing bays, we do not consider shared use of these with cyclists and pedestrians using the trod to be acceptable. Cyclists and pedestrians must be kept separate from motor vehicles and HGVs.

11. Drainage to the passing bays is proposed by a SUDs system of soakaways. The drainage assessment for the LDO concluded that “the ground conditions are not suitable for infiltration drainage”. We query whether further checks have been carried out to establish different conditions on the road verges to those encountered on the LDO site which allows this solution.

12. The visibility splay east of the new entrance notes that for the majority of its 125m length the existing hedge will have to be removed and replanted. Please confirm that all necessary permits for changes of the highway boundary and consultations with South Norfolk have been agreed under the Hedgerow Regulations.

13. The visibility splays at the proposed entrance appears to be designed for vehicles exiting the site only but does not consider other traffic at the bend on the existing highway. The wide area of verge at the bend of a narrow rural road provides visibility for traffic, legally travelling at up to 60mph, to see vehicles approaching from the opposite direction. This principle is negated by 16.5m long articulated lorries exiting the site and obscuring these lines of sight.

There are other issues which are particular to Easton village.

14. The proposals to cater for HGVs in the vicinity the Grade 1 Listed Church of St Peter are in conflict with ENP policies 1 and 4. The proposal (marked insert A, drawing no CL-1010 Rev P3) indicates that a critical part of the existing screening will be removed and would potentially lead to degradation in the setting of the Church.

15. The issue of car parking at the church is set out in the letter of 23rd July 2018 is not considered in the submission. Should the current proposal be agreed it will make the area around the church dangerous for anyone trying to visit.

16. The proposals near St. Peter's Church require additional land to be purchased from the diocese. Medieval churches are one of the few safe havens for wildflower diversity and insects, particularly butterflies. We firmly believe that loss part of an oasis for wildlife within the church setting can only be to its detriment and the rural setting.

17. With regard to insert B drawing no CL-1010 Rev P3 which shows a pram crossing, given the proximity to the bend a more formal approach to crossing the road at this point needs to be constructed. We believe in the interests of safety for pedestrians who have difficulty crossing a road within a few seconds a better solution is required at this position where vehicles are still decelerating out of the 60 mph zone.

We trust you will take these concerns in to consideration when making recommendations to the planning committee.

Yours sincerely



Cllr Julian Blackmore

Chair Marlingford and Colton Parish Council



Cllr Peter Milliken

Chair Easton Parish Council