



Easton Parish Council

Response Planning Application 2020/0962

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NEIGHBOURHOOD PLANNING AND PROJECT MANAGEMENT

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Executive Summary

The comments below are the views, comments and objections expressed by Easton Parish Council in respect of the Planning Application (June 2020) presented by Persimmon Homes in planning application 2020/0962.

While the Parish Council is pleased to see that Persimmon Homes have taken onboard a number of the concerns raised in our original response adopted by EPC on 6th July 2020. We are disappointed that they have failed to make reasonable adjustments in regard a number of key areas, as such it is our considered opinion that on balance, we must make the following statement.

Easton Parish Council at this time continues to be unable to support this application as it fails to comply with several planning policies. We would ask that South Norfolk Council, as the Local Planning Authority, **Deferred** the determination this application until the matters listed have been addressed.

The table below is an overview of our findings in relation to the revised layout plan EAS-PL01 Rev C

	Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Total	42	24	43	5	26	6	27	30	50	6	4	4	1
% of total housing	14.43%	8.25%	14.78%	1.72%	8.93%	2.06%	9.28%	10.31%	17.18%	2.06%	1.37%	1.37%	0.34%
Total	291	Units											
Accept	118	40.55%	↑ 12% Improvement										
Accept Provisional	131	45.02%	↓ -2% Reduction										
Not Acceptable	42	14.43%	↓ -10% Reduction										

- ❖ 42 properties equating to 14.43% of all properties on phase one are non-compliant with ENP 7.4.
- ❖ 30 properties equating to 10.31% of all properties parking layouts are poor in design and may lead to social disharmony. It has been calculated around 21%¹ of residents on this phase have the potential to be affected by parking disputes.
- ❖ Affordable homes and high-density areas have a disproportionate reduced number of visitor spaces. SNC Place Making Guide SPD 3.7.2.
- ❖ Bin blight continues to be a major concern in relation to drag distance and its knock-on effect in relation to 27 (9.28%) properties and needs to be designed out ENP 7.5
- ❖ Fear of Crime likely to affect 17% of the residents, due to poorly designed alleyways leading to the rear gardens of properties. Failure to meet ENP 6.6
- ❖ Shared roads have the potential to breach the Equalities Act 2010.
- ❖ Over 46% of plots are accessed from 'Shared Private Drives' – creating conflicts between pedestrians, cyclists and vehicles and failing to meet NPPF para.110.
- ❖ Infiltration results highlight only 50% of test results were classed as 'ok'.

¹ Based on 2019 data suggesting the average UK household is 2

<https://www.statista.com/statistics/281627/households-in-the-united-kingdom-uk-by-size/>

Introduction

This planning application will have an enormous impact on the day-to-day lives of every resident of the village of Easton and will change the village for ever – this is why it is so important to get this right first time – there will not be another chance.



Policy EAS 1 is the relevant site allocation policy concerning this reserve matters application. Within the requirements of EAS 1 (number 17) and the subsequent specific details stipulated in the Decision Notice of 2014/2611 (Condition 22) these are not addressed as part of this application and have just been ignored.

We feel that Condition 22 needs to be satisfied to ensure that if this application is approved, its design is appropriate and suitable so that there is no mismatch in approval outcomes. While the applicant procrastinates that this condition sits outside the scope of this application, we strongly contend it is a material factor in allowing this application to progress.



Condition 22 was applied as part of the Decision Notice issued by South Norfolk Council and was deemed appropriate and required to enable permission to be granted. The reason for Condition 22 is “To ensure that the highway network is adequate to cater for the development proposed.”

This development is required to address this issue to meet the requirements of the NPPF, paragraph 109.

It should also be noted that the Leader of South Norfolk Council made reference to and the need for the delivery of Condition 22 in the December 2020 meeting of the Greater Norwich Development Partnership Board.



The current application as it stands is at conflict with several policies within the Easton Neighbourhood Plan (ENP).

ENP 6.6

Enhancing the safety and security of our community, reducing the fear of crime and promoting people's sense of well being.

ENP 7.5

Designing layouts that provide accessible screened storage space for refuse and recycling within each property's curtilage.

ENP 7.4

Providing off-road car parking adjacent to or in front of new dwellings or in other adjacent locations that would be accessible to the occupiers of those houses and would be consistent with good standards of urban design. Where garages are provided to meet the standards identified in criterion 3 of this policy they should be located within the curtilage of each dwelling concerned.

This application continues to fail to comply with the Parking Standards for Norfolk Guide (2007) which states that 'garages will only be counted as car parking spaces where they are large enough to function as a car parking space and provide some domestic storage. It is considered that the minimum internal dimensions of a garage to fulfil these functions is 7.0m x 3.0m.' However, with the updated garage sizes we understand that in length the garages are only short by 15mm in length and 45mm in width to avoid undue wastage of materials which in turn helps reduce overall site and carbon wastage. It is our understanding that Norfolk Highways is happy to accept this breach of the guidance and as such we leave this matter to the discretion of officers in providing adequate justification as to the lowering of standards in relation to this particular development.

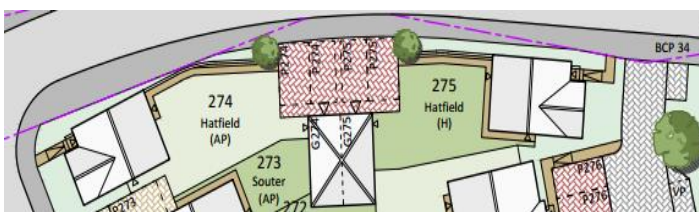
As part of the review process, each house type was reviewed to understand the sizing of each garage and space for parking that is provided to each plot. We have identified each plot and if a conflict exists between ENP policy 7.3 and 7.4 of this application as well as potential neighbour parking dispute areas which are of concern.

We have provisionally accepted several properties subject to the comments being addressed otherwise we would regard them as not meeting policy requirements of the Easton Neighbourhood Plan.

Pages 19 to 30 list each plot and our views on them concerning parking and other matters.

Garage locations

A number of the garages seem distant from the homes they should be associated with – poor design This includes Plots **80 / 86 / 202 / 203 / 274 / 275**.



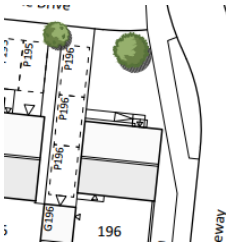
The revised layout only reduces the number of these potential problem properties by 1 which we believe reinforces our concerns over on street and verge parking in the areas affected by these properties.

This type of poor design is **not** acceptable.

Visitor Parking

We continue to be pleased that visitor parking has been provided in some areas of the development however we continue to have serious concerns at the lack of equality of distribution in which larger private ownership homes seem to have a much higher degree of visitor parking. While those living in affordable homes and high-density areas have a disproportionate reduced number of visitor spaces per dwelling in comparison to larger home types.

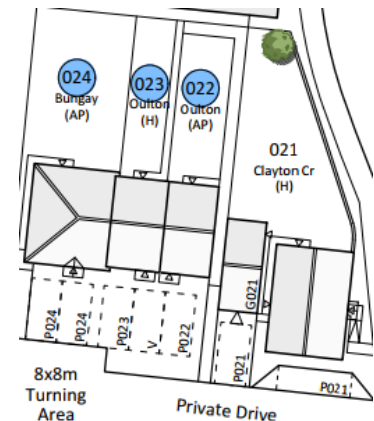
The parish council is opposed to this form of social disconnect which promotes the divide between social-economic groups. This goes against ENP Policy 2 Preserve 'Village Feel', Policy 6 Housing & Its Setting, the lack of suitable visitor parking detracts from the principals of ensuring the village of Easton continues to look and feel like a semi-rural village while accepting new homes in the area.



We are concerned that a verge area next to plot 196 becomes an unofficial parking area as such we would look for this to be designed out of the current layout drawing EAS-PL01 Rev C

Visitor spaces that are counted towards community accessible visitor spaces should not be positioned on private drives as this limits usability and may lead to conflicts between individuals. What are the rights of access to visitor spaces and who will maintain them? We have major concerns in relation to visitor spaces which have been positioned between the Oulton property types. Who will own and maintain them and who will have the right to use these spaces?

Properties affected by this potential flash point are plots **22/ 23/ 26/ 27/ 66/ 67/ 127/ 128/ 249/ 250/ 287/ 288 /289/ 290**, it should also be noted that these are all classed as affordable homes

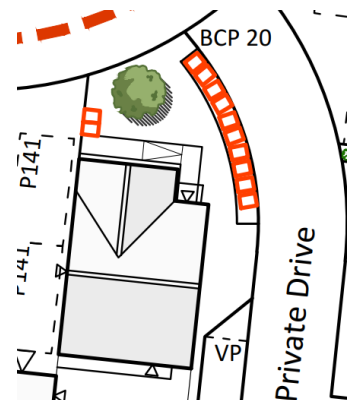


Bin Storage

ENP policy 7.5 requires all properties are provided with accessible screened storage space for refuse and recycling within the properties curtilage. EPC makes the following comments concerning this policy and its context with this application.

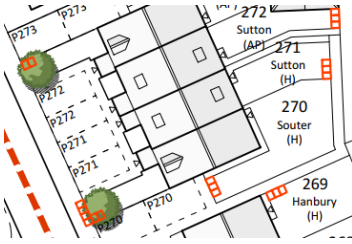
Bin blight continues to be a concern and needs to be designed out see South Norfolk Place-Making Guide SPD3.8.2. (Service and infrastructure elements), Environmental Protection Act 1990 s46 reinforced in Building Regulations 2010 H6 1.13.

Concerning the Refuse Plan EAS-PL04 Rev: B, a number of the bin collection points (BCP) are of concern as they may become unofficial parking or dumping areas. We are extremely concerned about BCP 20 which is on a private drive leading to six affordable designated rental properties and is positioned directly in front of Plot 141 and only a matter of meters from the front door. This is poor design and needs changing.



While this application shows the general day to day storage areas within most rear gardens this does not reflect everyday life – a visit to any street will find wheelie bins in most cases located at the front or side of a property.

It is unrealistic that bins will be stored in small rear gardens and, therefore is a concern, that in most cases these bins will not be placed in their designated screened storage areas (in the rear garden) and will be left at the front of properties due to the distance the designated bin collection areas are away from the front of the property.



Issues with layout have resulted in a number of homeowners having a considerable distance to drag their bins to the BCPs. No drag distance should be greater than 30m in line with guidance held in H6 1.8. Drag distances need to be calculated using pathways and not direct line of sight. This was agreed to be provided by the applicant but as yet not forthcoming.

This is needed to ensure that the obligations under policy ENP7.5 are adhered to in relation to the designing out of bin blight. The affected plots are **10/ 13/ 33/ 34/ 35/ 36/ 41/ 47/ 48/ 51/ 52/ 53/ 54/ 55/ 71/ 72/ 73/ 122/ 133/ 231/ 232/ 237/ 238/ 239/ 254/ 255/ 281**

We are concerned that BCP18 is not located adjacent to adopted highways and is located on 'private' space, therefore expecting refuse collectors to leave the highway to facilitate collections. This will result in a refuse collector walking excessive distance with multiple bins (back and forth).

The estimated drag distance from the furthest bin on BCP18 to the edge of the refuse collection route is 31.5m. The drag distance from plot 87 to the closest bin location on BCP 18 is 51.05m. These distances sit outside the current standards for drag distance Building Regulations 2010 H6 1.8.



This would result in disturbance and noise for future residents which would be persistent and unresolvable as such can be seen as a breach of ENP 6.6 as it will go against people's sense of wellbeing.

It is our opinion that this area should be a continuation of the adopted highway as it has 3 visitor spaces and a Size 3 turning head at the end of it.

Number of bins in BCPs will be excessive – waste bin, recycling bin, food waste and garden waste. SNC also allow 'side waste' to be collected – where are householders expected to put this? SNLP DMPD Policy 4.3 (2)

The BCPs are going to look unsightly and spoil the street scene. These BCPs are only required due to the extensive use of 'unadopted roads. We would also look for compliance with SNLP DMPD Policy 4.25.

It is still very disappointing that over 46% of homes are located off 'private drives' (unadopted roads), which is an extremely high number considering this development has the opportunity to apply 'best practice' in good design principles – rather than follow poor design standards as these proposals do and seek to implement bad design. This is unsatisfactory and should not be acceptable.

An alternative approach would be to redesign the layout and road hierarchy to improve the quality of this proposed development.

Highways

Street Hierarchy



We note the comments made in the agent's letter dated 3rd December 2020 page 12-13 and we do not accept their interpretation of the wording used within the Design Code. We have sought further professional advice as to the interpretation of the Design Code and we are satisfied that the remarks made in our original response are still valid and that the current illustrated layout **FAILS** to comply to the agreed Design Code and requires amending.

Shared Roads

The Parish Council continues to have serious concerns regarding the use of shared roads on residential developments.

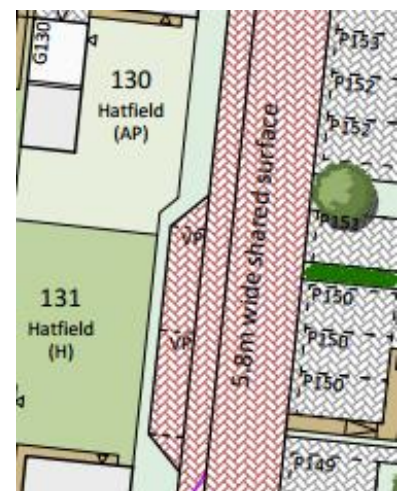


While we note on the layout design the inclusion of what looks like a pavement, we do not feel the design detail provides any level of comfort. The use of shared-space with low kerbs can cause problems for access, loading and turning. Not just for refuse collection but other large vehicles such as furniture delivery vans and removal lorries etc because cars parked on the kerbs limit the width of the road, especially for reversing and turning etc.

This can be seen as a potential breach of SNLP DMPD Policy 4.23

We also have further concerns that this is a token gesture as is clearly not designed for the safety of pedestrians as it puts them in direct conflict with other road users as illustrated the image showing visitor spaces on the inside of the so call safe footpath. This type of shared area is likely to be used as a parking area as it lacks definition from the rest of the road surface.

We refer you to our previous submission in relation to shared space usage on new developments. It is our considered opinion that a stand height foot path which is level and smooth is the most suitable solution for this area.



National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 91, which states *Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*



a) street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods.....

b) are safe and accessible.... through the use of clear and legible pedestrian routes.....

We refer to the document titled Adoptable Shared Road Equality Impact Assessment dated 25.11.2020 Ref 0094/EqIA and prepared by Schema Engineering on behalf of the applicant.

We note the contents of this report and the seemingly biased nature of its findings, however we are pleased that on page 4 the report identified that the 2018 CIHT review in consultation with the Disabled Persons Transport Advisory Committee (DPTAC) concluded that there is a lack of skills in the engineering sector in relation to designing accessible environments, and a lack of understanding of the requirements of the Equality Act 2010.

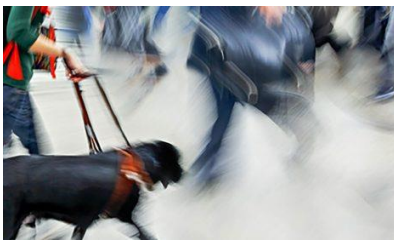
The conclusions of this report would seem to be built on the recommendations of the past and given the above are now questionable. This report does not mention any of the following facts which support the legal position as stated by Hewitsons Solicitors acting on behalf of Easton Parish Council in relation to the contention that the shared space roads are in contravention to current DfT Guidance on shared space roads.

- In July 2018 following a report by the Women and Equalities Committee recommending a halt to shared-space schemes, which “are a source of concern to many disabled people across the country”.
- in May 2019 the minister for disabled people wrote to the housing secretary urging that urgent action is taken over this issue.
- On the 7th January 2020, the National Federation of the Blind UK (NFGUK) and 112 other organisations representing people with disabilities handed in a petition to 10 Downing Street calling for an end to shared-space roads on new developments.
- In February 2020 Richard Bacon MP raised concerns around shared roads on new housing developments with the chief planning officer for South Norfolk and Broadland District Councils and is in discussions with MHCLG concerning this matter.

The president of the National Federation of the Blind UK, stated: "A pavement gives the opportunity for a blind person to access the local area knowing that they will not walk into moving traffic and this is as important in any housing estates as it is in any town or city centre."

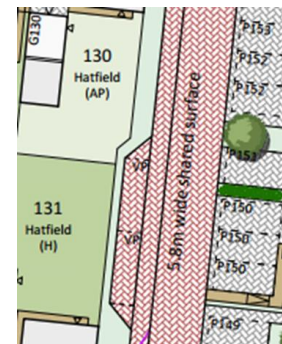
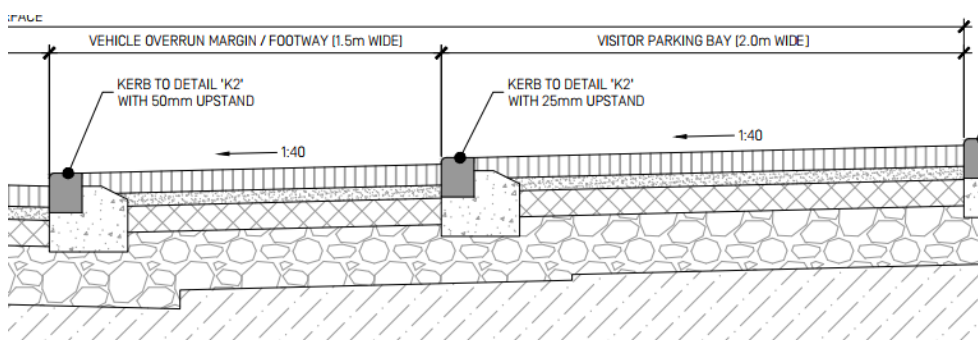
South Norfolk District Council is required under the law to perform its Public Sector Equality Duty (PSED) under the Equalities Act 2010 and should conduct its own separate independent enquiries. As part of these enquiries, it should be in contact with and direct discussions with potential user groups for their insight into any recommendations.

We are currently living in unprecedented times of a global health pandemic affecting many of those that should be consulted on this matter. It may be difficult to receive a direct response from many of the organisations that should be consulted in relation to the use of shared roads on new housing estates.



We would request that SNC in light of current circumstances accept the position that Disabled groups are not in favour of shared surface roads on new housing estates based on the campaign against their usage by the National Federation of the Blind UK (NFBUK) and 112 other organisations representing people with disabilities.

The NFBUK has two campaigns running at present, Pavements are for People and Shared Spaces <https://www.nfbuk.org/campaign-category/the-built-environment/>



When we look at the detail of the proposals no evidence has been provided to show that the design recommendations that are being suggested are anything more than window dressing in an attempt to appease the legitimate concerns of disabled people. The design of the visitor parking on the shared surface road is another clear example that those who are designing these estates need further training on disability issues.

Only Mews and Cul-de-Sacs are permitted to have limited shared space roads with no mention of loop roads in current guidance and as such this road should be removed from the plan.

It is a failure of the planning system to continue to allow shared roads and is in our opinion a clear and blatant discrimination against disabled people.

The continued use of shared roads is a potential breach of the Equalities Act 2010 and breaches several Articles within the United Nations Convention on the Rights of Persons with Disabilities including but not limited to Article 4.1(a) and Article 9.1.(a)

Shared Private Drives: Code 3.9.

Shared Private Drives are defined “as the most minor streets within the layout.” Sadly, this is not the case with a staggering to see 136 plots – that’s 46.6% of the total plots - are accessed from Share Private Drives.

All ‘shared private drives’ are required to be constructed to adoptable NCC Highways standard, as a requirement of ‘local planning policy’ (ENP Policy 10). No mention of the requirement is made in the Design Code Compliance Statement May 2020.

Policy 10: New Development Roads

The design, layout and building of new roads should be to Norfolk County Council Highways Authority adoptable standard and minimise the disturbance to the occupiers of existing dwellings. This includes avoiding new roads that immediately abut existing dwellings and gardens.

Have SNC now acquired clarity and confirmation from NCC Highways that ALL roads have been designed to the adoptable standard?

The wording used within the covering letter from the agent dated 3rd December 2020 is very vague on this point, at present our interpretation is that Persimmon Homes are looking to ignore the lawful requirements as set out in ENP Policy 10.

PLANNING LAYOUT - PHASE 1-6665263 fails to identify the “Macadam – Private Drives” in the Hard Landscaping Key as being to “Adoptable Specification” unlike the Asphalt Roads and Footpaths.

The key does identify Block Pave – Brindle will be constructed to the required standard but only on ‘share surface roads’, NOT ‘share private drives. (“* Where brindle block paving is used for shared surface roads, roads to be constructed to adoptable specification with block paved finish”).

The application requires amendment to demonstrate clearly that all shared private drives are constructed to NCC Highways adoptable standard.

Formal Play areas

The Parish Council is pleased to note the low-level screening that is to be used at visitor spaces next to LAP’s. We would look to the Police to give further guidance on this matter.

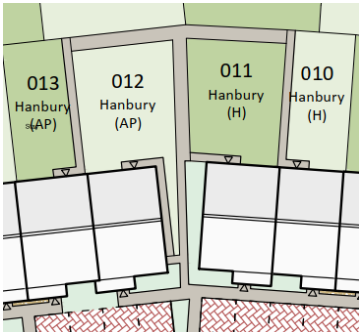
It should be noted that the Parish Council will only adopt children’s play areas in which we have been involved in the design and our preferred supplier is used. The reason behind this is to ensure a single contractor can service and maintain all the play areas which provide a major cost saving to the parish. Our preferred supplier is a local company called Action Play and Leisure.



Designing out Crime

We note the comments raised and the actions that are planned with regard to fence and trestle height, while in the short term this option may work over time residents will make changes to feel more secure like growing plants to fill the gaps in the trestle fencing or even replace trestle fencing for full height fencing. The idea is to design out crime from day one and we continue to support the original concerns raised by Norfolk Constabulary's Designing Out Crime Officer. We fully endorse the comments made and support the changes requested. Having reviewed the revised shared pathways on phase 1, we are very concerned that 50 properties on this phase have the potential to provide unnecessary recesses and casual access to rear of dwellings. In turn this has the potential to increase the fear of crime to 17% of the residents on phase 1.

Easton Parish Council request that in an effort to protect residents from potential crime wrought iron security gates are fitted with either centre key or code locks at the front build line of all properties that have a shared pathway to the rear of the property.

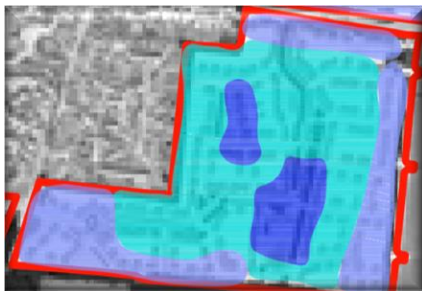


For ease we have listed all the plots likely to need this type of crime reduction measure.

Plots 10, 11, 12, 13, 33, 34, 35, 36, 37, 38, 39, 40, 41, 48, 49, 50, 54, 69, 121, 126, 132, 133, 220, 221, 223, 224, 225, 231, 232, 233, 236, 237, 238, 239, 241, 242, 243, 244, 245, 246, 254, 255, 256, 270, 271, 272, 276, 279, 280, 281, 282, 283, 284, 285

Density

We are pleased that the density areas have been adjusted and are more in keeping with what was agreed within the Design Code 2019.



Original agreed density 2014

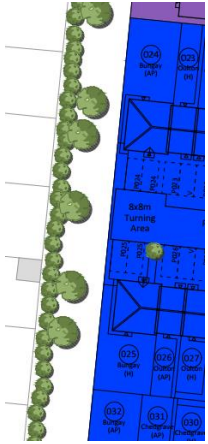


Design Code 2019



Revised layout December 2020

2014/2611 Discharge of Conditions 31 & 32 Report



We can find no evidence that Persimmon Homes have given due consideration to the points we previously raised in relation to the discharge of conditions 31 & 32 report filed with the original application.

We reiterate our comments and concerns in that page 7 s3.6 does not identify the 10m buffer zone on phase 1. We request that it is conditional that all buffer zones should be created in advance of any development and at least 2 years before the building of any new homes within 30m of the edge of the buffer zone. The reason for this is to ensure ENP Policy 9 Privacy of Existing Homes is fully implemented.

Should the applicant wish to build within this area before the privacy buffer is established, we would ask that a condition is set which requires the erection of a 1.8m high close board fence utilising concrete posts and concrete gravel boards, along the inside edge of their buffer boundary zone before any work on site is undertaken within that area to respect the privacy of existing residents.



Noise



It is understood that the acoustic report has been accepted by SNC and a number of mitigating measures are to be put in place. While we accept these conclusions, we continue to have some concerns that unless noise reduction measures are implemented on the boundary treatment between Phase 1 and the RNSG any new residents may suffer noise blight.

We continue to push for a time-limited condition on this application that will require the applicant to provide suitable noise protection measures if residents are unduly affected by the noise generated from the RNSG, this is to safeguard residents' rights to a private and family life and those of the RNSG to conduct their business.

We would suggest any condition is in place for 10 years from completion of phase 1 of the development, it should be monitored by SNC and the costs of such monitoring should be borne by the applicant of this planning application.

Surface & Foul Water Reserve Matters

Supporting Documents -

**Phase One Land at Easton prepared by Richard Jackson Engineering Consultants
Amendment C 24th November 2020.**

It is noted that neither Persimmon Homes nor Richard Jackson Engineering Consultants have directly referred to the concerns we raised in our initial response specifically in relation to Surface & Foul Water Reserve Matters Supporting Documents (SFWRMSD) Rev C report and we continue to hold these concerns.

We note that the revised SFWRMSD focus has been on trying to satisfy the LLFA technical concerns, although the details provided fall short in doing this – the report is considered incomplete and inconclusive.

In section 5.4 the explanation for reducing flow rates to meet the LLFA requirements does not specifically explain the impact of this significant flow rate reduction that will increase the need for water retention and increased water levels in the attenuation basin.



The proposed basins and swales will have a major impact on the visual landscape, as such we are looking to ensure that they are areas that are well maintained for visual, environmental and efficiency of use.

We would prefer to see the general upkeep and visual appearance of these features to be maintained by a management company and the costs recovered from the residents of this development rather than having further burden placed upon the limited public purse.

The SuDS Maintenance Plan is at odds with NCC Highways maintenance policies as they will only provide very limited cuts per year and have stated they will not clear litter from them. We look for amendments to the SuDS Maintenance Plan as its wording is vague and open to interpretation.



We would request the following amendments

Maintenance	Action	Frequency
Regular Maintenance	Check inlets, outlets, control structures and overflows.	Monthly
	Waste removal from site that might block inlets, outlets or what might cause an environmental hazard.	Weekly
	Grass cutting / plant control on / around detention basin.	Every two weeks during growing season
	Gratings, inspection chambers and silt traps – Check for damage and blockages.	Annually
	Regular maintenance and jetting of carrier pipes.	Annually
	Regular maintenance schedule to be updated.	Annually
Occasional Tasks	Jetting and suction where silt has settled.	Annually or as required by manufacturers

It is clear from the updated report that parts of the site continue to show serious issues in relation to infiltration which is most likely due to large clay pockets which are found in many areas of the village at a variety of depths.

We refer to the Geosphere Environmental Report 5184, GI/GROUND/EP, PD, /17-11-20/V1 which is buried within the Richard Jackson Engineering report starting on page 119.

The Executive summary, when read in conjunction with the rest of the report, highlights several concerns: in that BRE06, BRE027, BRE029 and BRE037 have infiltration concerns – these trenches were only dug to 2m in depth while others were dug to 3m, it would have been expected that the problem trenches would have gone deeper to be consistent with the others or at least an explanation why not. We refer to our comments on clay pockets above.

While the report highlights the issues with these locations, what it fails to highlight are issues with 20 other sites tested recording results as being 'poor' or 'not so good'. This means of the 48 locations tested only 50% were classed as 'ok'.

We note the off-site infiltration test where variable in success and as such we look to the LLFA, Anglian Water and The Environment Agency to ensure a rigorous review is undertaken before this application is considered.

These results are not satisfactory to demonstrate an adequate drainage strategy for the site without further robust evidence. We highlight the following additional issues within this report;

- Page² 8.2.1 While the burial ground to the west of the site is mentioned, the capped well to the east of the burial ground which was capped for fear of contamination in the 1960's has not been mentioned nor has the large burial ground to the south of BRE02



² Geosphere Environmental Report 5184, GI/GROUND/EP, PD, /17-11-20/V1
2020/0962 Persimmon Homes Planning Application (June 2020) Revised Comments December 2020

Local knowledge of the area has previously raised the issue of clay belts and the failure of water to infiltrate the clay belt, this results in the surface water flooding which is already happening in other parts of the village, along parts of Marlingford Road, Hall Road and Woodview Road.

Due to the depth of the infiltration basins, these should all be fenced off from the public due to safety concerns. The land they are on does not count towards public open space. It needs to be proven that these basins do not hold water even for short periods (the Surface & Foul Water Report dated 20 March 2020 confirms there will be standing water). A concern is that they are designed to hold water at a depth greater than 1m and have a total depth of between 1.6m and 1.8m below ground surface level.



Only once it can be proven that they do not hold water should they be allowed to count as public open space. We would look to the LLFA to guarantee that they will not hold water at any time, with water draining through the surface layer with limited to no delay even under extreme conditions.

Swales



As a surface water drainage solution, Swales are not the favoured approach of the Local Planning Authority. An open 'sewer' in which will collect litter and discarded bags of 'dog excrement'.

A swale will require frequent maintenance and cleaning to remain serviceable – who is going to undertake and pay for this work?

It should be noted that the Swales are significant elements of infrastructure having a depth of 0.5m and width of 6.0m. It is difficult to understand how adequate assessment of the performance of the Swales has been tested to a satisfactory level as the cross-section design (on page 18) specifies a number of variables which must impact on absorption, infiltration, retention rates and flow levels in the carried pipes to the basins.

This inconsistency is highlighted where an unknown length of Swale 4 reduces to a maximum of only 4m in width, with the knock-on effect of reducing its performance and capability.

Whilst there are specific performance assessments (based on assumptions) for Swales 2 and 3, there are no performance assessments for Swale 4 as it is 'not an infiltration Swale' –

- Why is this?
- Why have this Swale?
- Is Basin 1 going to be able to cope with all the surface run off and water from Swale 4?
- How deep is the water in Basin 1 going to get?

As Swale 4 is different (not really a Swale) please can the design specification and cross-section be provided for Swale 4?

It should also be noted that in Table 4 – Onsite Infiltration Testing Results (m/s), on page 135, the location BRE027 (located in Swale 3) resulted in “**No appreciable infiltration**” – again this illustrates the weakness and lack of robustness of the desk top assessment on the performance of Swale 3.

This also means that most of the collected surface run off water will need to be transported through the carrier pipe along Swale 3 and Swale 4 to the close’s attenuation basin with a knock-on impact on both Swale 4 and the overloading of Basin 1.

Diagram 49120-PP-SK24 does not show a surface water sewer linking Swale 3 and Swale 4. This isolates Swale 3, which already has an identified infiltration problem, and due to the topography of the land the western end of Swale 3 is likely to become saturated with the likelihood of flooding.

A number of the Swales are located with ‘Private Drives’. This presents a number of issues to resolve.

- How will Highways access (separate Section 38 agreements with each homeowner)? – unlikely.
- Will NCC Highways adopt the ‘Private Drive’ element that crosses each swale? – unlikely.
- Who takes responsibility for the bridges over the swale or tunnels under the ‘Private Drive’? – unknown!



The response to the LLFA in the letter from Richard Jackson Engineering Consultants dated the 24th November 2020 at point 10 would seem to indicate that it is suggested the LLFA and SNC allows a Caveat emptor approach to this matter, we do not believe that this is an acceptable approach.

For safety reasons we would look for all swales and basins to be proven not to hold water even in a 1 in a 100-year event, together with an established management plan undertaken which ensures weekly litter and debris clearance of the swales and basins.

We would look to the LLFA to guarantee that these structures will not hold water at any time, with water draining through the surface layer with limited to no delay even under extreme conditions.

Conclusion

Easton Parish Council at this time continues to be unable to support this application as it fails to comply with several planning policies. We would ask that South Norfolk Council, as the Local Planning Authority, **Deferred** the determination this application until the matters listed have been addressed.

Plot Review Findings

Building Plot reviews 1 - 28																
Plot	Type	Bedroom	EPC View	Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
1	Hatfield	3	Accept													
2	Hatfield	3	Accept													
3	Hatfield	3	Accept													
4	Hatfield	3	Accept													
5	Redcar	3	Accept													
6	Redcar	3	Accept													
7	Chedworth	4	Accept													
8	Chedworth	4	Accept													
9	Hanbury	3	Accept													
10	Hanbury	3	Accept Provisional													
11	Hanbury	3	Accept													
12	Hanbury	3	Accept Provisional													
13	Hanbury	3	Accept Provisional													
14	Hanbury	3	Accept													
15	Banham	2	Accept													
16	Banham	2	Accept													
17	Banham	2	Not Acceptable													
18	Banham	2	Accept Provisional													
19	A88B	3	Accept													
20	A88B	3	Accept													
21	Clayton	3	Accept Provisional													
22	Oulton	1	Accept Provisional													
23	Oulton	1	Accept Provisional													
24	Bungay	1	Accept													
25	Bungay	1	Accept													
26	Oulton	1	Accept Provisional													
27	Oulton	1	Accept Provisional													
28	Clayton	3	Accept Provisional													

Building Plot reviews 29 - 56				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
29	Clayton	3	Accept Provisional													
30	Chedgrave	2	Accept													
31	Chedgrave	2	Accept													
32	Bungay	1	Accept													
33	Bungay	1	Accept Provisional													
34	Chedgrave	2	Accept Provisional													
35	Chedgrave	2	Accept Provisional													
36	Chedgrave	2	Accept Provisional													
37	Chedgrave	2	Accept Provisional													
38	Clayton	3	Accept Provisional													
39	Rufford	3	Accept Provisional													
40	Coltishall	3	Accept Provisional													
41	Coltishall	3	Accept Provisional													
42	Coltishall	3	Accept													
43	Alnwick	2	Accept Provisional													
44	Alnwick	2	Not Acceptable													
45	Clayton	3	Accept													
46	Bawburgh	3	Accept Provisional													
47	Alnwick	2	Accept Provisional													
48	Alnwick	2	Not Acceptable													
49	Alnwick	2	Not Acceptable													
50	Hatfield	3	Accept Provisional													
51	Souter	3	Not Acceptable													
52	Sutton	3	Not Acceptable													
53	Sutton	3	Not Acceptable													
54	Souter	3	Accept Provisional													
55	Bawburgh	3	Accept Provisional													
56	Souter	3	Not Acceptable													

Building Plot reviews 57 - 84				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
57	Sutton	3	Not Acceptable													
58	Sutton	3	Not Acceptable													
59	Souter	3	Not Acceptable													
60	A88B	3	Accept													
61	Hanbury	3	Accept													
62	Clayton	3	Not Acceptable													
63	Hatfield	3	Accept													
64	Alnwick	2	Accept Provisional													
65	Alnwick	2	Not Acceptable													
66	Oulton	1	Accept Provisional													
67	Oulton	1	Accept Provisional													
68	Hanbury	3	Accept Provisional													
69	Hanbury	3	Accept Provisional													
70	Hatfield	3	Accept Provisional													
71	Coltishall	3	Accept Provisional													
72	Coltishall	3	Not Acceptable													
73	Coltishall	3	Not Acceptable													
74	Souter	3	Not Acceptable													
75	Sutton	3	Not Acceptable													
76	Sutton	3	Not Acceptable													
77	Souter	3	Accept													
78	Hatfield	3	Accept													
79	Hatfield	3	Accept													
80	Hatfield	3	Accept Provisional													
81	Rufford	3	Accept													
82	Hatfield	3	Accept													
83	Hatfield	3	Accept													
84	Alnwick	2	Accept Provisional													

Building Plot reviews 85 - 112				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
85	Alnwick	2	Accept Provisional													
86	Hatfield	3	Accept Provisional													
87	Chedworth	4	Accept													
88	Chedworth	4	Accept													
89	Clayton	3	Accept													
90	Hanbury	3	Accept Provisional													
91	Hanbury	3	Accept Provisional													
92	Hanbury	3	Accept Provisional													
93	Rufford	3	Accept													
94	Rufford	3	Accept													
95	Roseberry	4	Accept													
96	Mosley	3	Accept Provisional													
97	Mosley	3	Not Acceptable													
98	Mosley	3	Not Acceptable													
99	Roseberry	4	Accept													
100	Alnwick	2	Accept Provisional													
101	Alnwick	2	Accept Provisional													
102	Mosley	3	Accept Provisional													
103	Mosley	3	Accept Provisional													
104	Hanbury	3	Accept Provisional													
105	Clayton	3	Accept Provisional													
106	Winstar	4	Accept													
107	Roseberry	4	Accept													
108	Roseberry	4	Accept													
109	Winstar	4	Accept													
110	Chedworth	4	Accept													
111	Chedworth	4	Accept													
112	Roseberry	4	Accept													

Building Plot reviews 113 - 140				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
113	Winster	4	Accept													
114	Roseberry	4	Accept													
115	Chedworth	4	Accept													
116	Chedworth	3	Accept													
117	Chedworth	3	Accept													
118	Clayton	3	Accept Provisional													
119	Clayton	3	Accept Provisional													
120	Rufford	3	Accept													
121	Souter	3	Accept Provisional													
122	Sutton	3	Not Acceptable													
123	Souter	3	Not Acceptable													
124	Rufford	3	Accept													
125	Clayton	3	Accept Provisional													
126	Rufford	3	Accept Provisional													
127	Oulton	1	Accept Provisional													
128	Oulton	1	Accept Provisional													
129	Rufford	3	Accept													
130	Hatfield	3	Accept Provisional													
131	Hatfield	3	Accept Provisional													
132	Chedgrave	2	Accept Provisional													
133	Chedgrave	2	Accept Provisional													
134	Chedgrave	2	Accept Provisional													
135	Alnwick	2	Accept Provisional													
136	Alnwick	2	Not Acceptable													
137	Alnwick	2	Not Acceptable													
138	Chedgrave	2	Accept													
139	Chedgrave	2	Accept													
140	Chedgrave	2	Accept													

Building Plot reviews 141 - 168				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
141	Hatfield	3	Accept Provisional													
142	Coltishall	3	Accept													
143	Coltishall	3	Accept													
144	Chedgrave	2	Accept													
145	Chedgrave	2	Accept													
146	Coltishall	3	Accept													
147	Coltishall	3	Accept													
148	Chedgrave	2	Accept													
149	Chedgrave	2	Accept													
150	Roseberry	4	Accept													
151	Alnwick	2	Accept Provisional													
152	Alnwick	2	Not Acceptable													
153	Alnwick	2	Not Acceptable													
154	Roseberry	4	Accept													
155	Chedworth	3	Accept													
156	Marlborough	4	Accept													
157	Strand	4	Accept													
158	Mayfair	4	Accept Provisional													
159	Dowing	4	Accept													
160	Strand	4	Accept													
161	Strand	4	Accept													
162	Dowing	4	Accept													
163	Whitehall	3	Accept Provisional													
164	Dowing	4	Accept													
165	Dowing	4	Accept													
166	Whitehall	3	Accept Provisional													
167	Mayfair	4	Accept Provisional													
168	Whitehall	3	Accept													

Building Plot reviews 169 - 196				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
169	Oxford	4	Accept													
170	Oxford	4	Accept													
171	Dowing	4	Accept													
172	Strand	4	Accept													
173	Mayfair	4	Accept Provisional													
174	Dowing	4	Accept													
175	Strand	4	Accept													
176	Dowing	4	Accept													
177	Mayfair	4	Accept Provisional													
178	Mayfair	4	Accept Provisional													
179	Whitehall	3	Accept Provisional													
180	Whitehall	3	Accept Provisional													
181	Mayfair	4	Accept Provisional													
182	Marlborough	4	Accept Provisional													
183	Mayfair	4	Accept Provisional													
184	Mayfair	4	Accept Provisional													
185	Mayfair	4	Accept Provisional													
186	Mayfair	4	Accept Provisional													
187	Marlborough	4	Accept													
188	Oxford	4	Accept													
189	Marlborough	4	Accept													
190	Marlborough	4	Accept Provisional													
191	Mayfair	4	Accept													
192	Mayfair	4	Accept													
193	Oxford	4	Accept													
194	Dowing	4	Accept													
195	Dowing	4	Accept													
196	Whitehall	3	Accept Provisional													

Building Plot reviews 197 - 224				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
197	Marlborough	4	Accept Provisional													
198	Strand	4	Accept													
199	Strand	4	Accept													
200	Whitehall	3	Accept Provisional													
201	Strand	4	Accept													
202	Whitehall	3	Accept Provisional													
203	Whitehall	3	Accept Provisional													
204	Dowing	4	Accept													
205	Dowing	4	Accept													
206	Whitehall	3	Accept Provisional													
207	Whitehall	3	Accept Provisional													
208	Mayfair	4	Accept Provisional													
209	Whitehall	3	Accept Provisional													
210	Whitehall	3	Accept Provisional													
211	Mayfair	4	Accept Provisional													
212	Hatfield	3	Accept													
213	Alnwick	2	Not Acceptable													
214	Alnwick	2	Accept													
215	Alnwick	3	Not Acceptable													
216	Alnwick	3	Accept													
217	Redcar	3	Accept													
218	Redcar	3	Accept													
219	Alnwick	2	Accept Provisional													
220	Alnwick	2	Not Acceptable													
221	Alnwick	2	Not Acceptable													
222	Chedworth	4	Accept													
223	Hanbury	3	Accept Provisional													
224	Hanbury	3	Accept Provisional													

Building Plot reviews 225 - 252																
Plot	Type	Bedroom	EPC View	Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
225	Hanbury	3	Accept Provisional													
226	Chedworth	4	Accept													
227	Chedworth	4	Accept Provisional													
228	Alnwick	2	Accept													
229	Alnwick	2	Accept													
230	Chedgrave	2	Accept													
231	Coltishall	3	Not Acceptable													
232	Coltishall	3	Accept Provisional													
233	Coltishall	3	Accept Provisional													
234	Loddon	4	Accept													
235	Loddon	4	Accept													
236	Coltishall	3	Accept Provisional													
237	Coltishall	3	Accept Provisional													
238	Coltishall	3	Accept Provisional													
239	Chedgrave	2	Accept Provisional													
240	Redcar	3	Accept Provisional													
241	Redcar	3	Not Acceptable													
242	Souter	3	Not Acceptable													
243	Sutton	3	Not Acceptable													
244	Sutton	3	Not Acceptable													
245	Souter	3	Not Acceptable													
246	Redcar	3	Not Acceptable													
247	Redcar	3	Accept Provisional													
248	Oulton	1	Accept													
249	Oulton	1	Accept Provisional													
250	Oulton	1	Accept Provisional													
251	Alnwick	2	Accept													
252	Alnwick	2	Accept													

Building Plot reviews 253 - 280				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP20
Plot	Type	Bedroom	EPC View													
253	Mosley	3	Accept													
254	Mosley	3	Accept Provisional													
255	Mosley	3	Accept Provisional													
256	Mosley	3	Accept Provisional													
257	Coltishall	3	Accept													
258	Coltishall	3	Accept													
259	Hanbury	3	Accept													
260	Clayton	3	Accept Provisional													
261	Chedgrave	2	Accept Provisional													
262	Chedgrave	2	Accept													
263	Coltishall	3	Accept Provisional													
264	Coltishall	3	Accept Provisional													
265	Hanbury	3	Accept Provisional													
266	Hanbury	3	Accept Provisional													
267	Hatfield	3	Accept Provisional													
268	Hanbury	3	Accept													
269	Hanbury	3	Accept													
270	Souter	3	Accept Provisional													
271	Sutton	3	Not Acceptable													
272	Sutton	3	Not Acceptable													
273	Souter	3	Accept Provisional													
274	Hatfield	3	Accept Provisional													
275	Hatfield	3	Accept Provisional													
276	Winsters	4	Accept Provisional													
277	Hanbury	3	Accept Provisional													
278	Hanbury	3	Accept Provisional													
279	Winsters	4	Accept Provisional													
280	Mosley	3	Accept Provisional													

Building Plot reviews 281 - 291				Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern shared surface parking	Concern drag distance	Concern parking provision Neighbour disputes	Concern rear garden security	No natural parking surveillance	Limited natural surveillance	Rear parking court	Serious concerns re placement of BCP 20
Plot	Type	Bedroom	EPC View													
281	Mosley	3	Not Acceptable													
282	Mosley	3	Accept Provisional													
283	Mosley	3	Accept Provisional													
284	Mosley	3	Not Acceptable													
285	Mosley	3	Not Acceptable													
286	Mosley	3	Accept Provisional													
287	Oulton	1	Accept Provisional													
288	Oulton	1	Accept Provisional													
289	Oulton	1	Accept Provisional													
290	Oulton	1	Accept Provisional													
291	Hatfield	3	Accept Provisional													
Total % of total housing				42 14.43%	24 8.25%	43 14.78%	5 1.72%	26 8.93%	6 2.06%	27 9.28%	30 10.31%	50 17.18%	6 2.06%	4 1.37%	4 1.37%	1 0.34%
Total				291 Units												
Accept				118	41%	↑ 12% Improvement										
Accept Provisional				131	45%	↓ -2% Reduction										
Not Acceptable				42	14%	↓ -10% Reduction										