



# Easton Parish Council

Initial Response Planning Application 2021/1847

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ABZAG Ltd

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 (EPC) in respect of the Planning Application (August 2021) presented by Orbit Homes (2020) Ltd in planning application 2021/1847.

Due to several concerns, we must make the following statement:

Easton Parish Council at this time is unable to support this application as it fails to comply with several planning policies. We would ask that this application is **Deferred** permission until the matters listed have been addressed.

The table below is an overview of our findings concerning the layout of the Proposed Masterplan DWG 003 Rev P22

	Non compliance ENP 7.4	Confirm compliance ENP 7.4	Concern pavement parking	Concern pavement parking near bend or junction	Concern verge parking	Concern drag distance	Concern parking provision Neighbour disputes	Rear parking court	Lack of consideration of accessible needs Gardens	Rear Security concerns
<b>Total</b>	<b>10</b>	<b>1</b>	<b>6</b>	<b>1</b>	<b>2</b>	<b>6</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>1</b>
<b>% of total housing</b>	<b>13.89%</b>	<b>1.39%</b>	<b>8.33%</b>	<b>1.39%</b>	<b>2.78%</b>	<b>8.33%</b>	<b>2.78%</b>	<b>2.78%</b>	<b>5.56%</b>	<b>1.39%</b>
<b>Total</b>	<b>72</b>	<b>Units</b>								
<b>Accept</b>	<b>44</b>	<b>61.11%</b>								
<b>Accept Provisional</b>	<b>14</b>	<b>19.44%</b>								
<b>Not Acceptable</b>	<b>14</b>	<b>19.44%</b>								

Figure 1 EPC review of building plots

- ❖ 10 properties equating to 13.89% of all properties on this development are non-compliant with ENP 7.4.
- ❖ 2 properties equating to 2.78% of all properties parking layouts may lead to neighbourhood disputes and lead to social disharmony. It has been calculated in the region of around 5%<sup>1</sup> of residents on this phase have the potential to be affected by parking disputes.
- ❖ Bin blight continues to be concerning especially the drag distances in relation to 6 (8.33%) properties which needs to be designed out to comply with ENP 7.5
- ❖ Shared road areas have the potential to breach the Equalities Act 2010.
- ❖ 52.78% of plots are accessed from ‘Shared Roads or Private Drives’ – creating conflicts between pedestrians, cyclists and vehicles and failing to meet NPPF (July 2021) para.112.

<sup>1</sup> 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 impact on the day-to-day lives of the residents of the village of Easton, increases current housing stock by 11.43%.



Figure 2 Traffic chaos Show ground roundabout



Figure 3 Death on Dereham Road, Easton

The original planning application was approved under planning application 2019/1251 for the building of 64 units mainly market value units.

The revised application is for 72 affordable rented units of which around 40% will be affordable shared ownership units.

The Parish Council is in favour of this change subject to safeguards being put in place under a section 106 agreement in which local people and those with connections have the first refusal to available units including ex-military personal.

We would hope that Orbit Homes working with South Norfolk Council and Easton Parish Council will instigate an education plan that will support local people to register on the local housing list.

We would also like to have considered as part of the s106 agreement that the 1-bedroom flats can be considered for transfer of ownership to an agreed Community Land Trust.

This will enable Easton it offers the ability to support local people who may fall through the local housing needs net into truly affordable housing and not have to rely on private sector landlords.



The current application as it stands conflicts 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.

As part of the review process, each house type was reviewed to understand the sizing of each property and the 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 11 to 14 list each plot and our views on them concerning parking and other matters.

## Garage locations

At this time, we note no garages are proposed on-site as such we raise no concerns at this time, however, should garages be introduced at a later stage we will expect to be consulted again on this matter.

## Parking

We are disappointed at the limited visitor parking that has been provided in most areas of the development. 1 visitor parking place per 12 plots is an unacceptable ratio. We feel that placing two spaces in the northeastern sector of the development and 4 in the northwestern sector is a cynical attempt to tick a box that has little or no benefit to the residents of this new development.

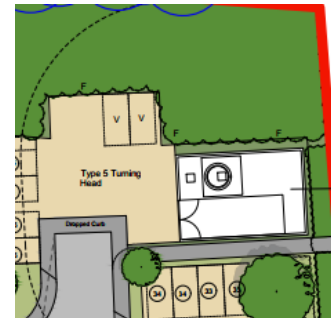


Figure 4 unsuitable location visitor parking

This lack of forward-thinking is likely to lead to unwelcome parking on pavements and will be a blight on generations to come that will live on this development.

This goes against ENP Policy 2 Preserve 'Village Feel', Policy 6 Housing & Its Setting, the lack of suitable visitor parking detracts from the principles of ensuring the village of Easton continues to look and feel like a semi-rural village while accepting new homes in the area.

Visitor spaces that are counted towards community accessible visitor spaces should not be positioned on shared 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 if properties are purchased in the future?



Figure 5 Against ENP 7.4

We would suggest that the adoptable highway is extended to include the type 3 turning head up to unit 54.

## 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 find it difficult to make full comments on this matter as there is a lack of detail as to a formal refuse plan.

The only areas we can comment on are as follows the BCP of plots 14 and 15 may be excessive. 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 a direct line of sight.

No BCP has been identified for plots 50 to 55 inclusive. Once a refuse plan is available, we will be happy to make a supplementary comment on this matter.

## Highways

As this development will increase resident numbers along this stretch of the Dereham Road we would look for some mitigation works to be undertaken as part of a s278 agreement, this would include a new bus shelter to replace the existing brick shelter next to the development, a safe crossing point created between the two bus stops on Dereham Road. We would also look for you to consider further migration at the other two bus stops on Dereham Road to include a safe crossing point for them as well. The Parish Council is prepared to financially support this work.

## Street Hierarchy



Figure 6 BLIND Paralympian Will Norman has said “walking down clogged up footpaths is like playing “Russian roulette”  
Picture by Nick Toogood



Figure 7 Can you spot the problem

The Parish Council is pleased that the original approved design has now included pavements around the adopted roads however we have serious concerns regarding the use of a shared drive serving the plots 50 to 55.

It is disappointing that Orbit Homes has not fully embraced the Equalities Act.

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

The current shared drive design is not designed for the safety of pedestrians as it puts them in direct conflict with other road users. 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.

It is our considered opinion that a stand height footpath which is level and smooth is the most suitable solution for this area.

National Planning Policy Framework (NPPF July 2021) gives significant weight to promoting safe communities (in section 8 of the NPPF July 2021). This is highlighted by the provision of paragraph 92, which states *Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*



Figure 8 Wheelchair users have rights as well



Figure 9 Mother and baby placed in danger

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 would refer you to 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 concerning 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.

- 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 concerning the use of shared roads on new housing estates.





Figure 10 The partially sighted need safe space to walk

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/>

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:

Shared Private Drives is defined “as the most minor streets within any layout.” Sadly, this is not the case it is staggering to see 38 plots – that’s 52.78% of the total plots - are accessed from Share Private Drives.

All ‘shared private drives’ are required to be consulted to adoptable NCC Highways standard, as a requirement of ‘local planning policy (ENP Policy 10).

**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.

### Formal Play areas



Figure 4 Children's pay area

The Parish Council is pleased to note the low-level screening that is to be used around the LAP.

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 have no comments to make at this time but reserve our position to do so at a later date.

## Density

We are satisfied with the density areas of this application

## Path to nowhere

We are surprised to see that a path has been created to a section of land which is highly contaminated to the degree Persimmon Homes walked away from its development as part of planning approval 2014/2611. With the inclusion of this path the Dementia friendly status for this site is diminished.



## Surface & Foul water

### Drainage Basin

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

Due to the depth of the infiltration basin, we are pleased to see it will be fenced off from the public due to safety concerns. The land it is on should not count towards public open space as it is fenced.

We are happy with the adopted drainage strategy for this development.

## Conclusion

Easton Parish Council at this time is 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 of this application until the matters listed have been addressed.

# Plot Review Findings

Plot	Type	Bedroom	Parking	Garage	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 drag distance	Concern parking provision Neighbour disputes	Rear parking court	Lack of consideration of accessible needs Gardens	Rear Security concerns
1	H6 Walpole semi	3	2	0	Accept										
2	H6 Walpole semi	3	2	0	Accept										
3	H5 Calabria semi	2	2	0	Accept										
4	H5 Calabria semi	2	2	0	Accept										
5	H6 Walpole terrace	3	2	0	Accept Provisional										1
6	H6 Walpole terrace	3	2	0	Not Acceptable	1				1		1			
7	H6 Walpole terrace	3	2	0	Accept										
8	H5 Calabria semi	2	2	0	Accept										
9	H5 Calabria semi	2	2	0	Accept										
10	H6 Walpole	3	2	0	Accept Provisional			1							
11	H6 Walpole corner semi	3	2	0	Accept										
12	H6 Walpole corner semi	3	2	0	Accept Provisional					1					
13	H5 Calabria semi	2	2	0	Accept										
14	H5 Calabria semi	2	2	0	Accept Provisional						1				
15	H5 Calabria semi	2	2	0	Accept Provisional						1				
16	H5 Calabria semi	2	2	0	Accept										

17	H6 Walpole	3	2	0	Accept														
18	H2 Portland comer	3	2	0	Accept														
19	H2 Portland comer	3	2	0	Accept Provisional				1										
20	H4 House semi with H	4	3	0	Accept Provisional					1									
21	H2 Portland comer	3	2	0	Accept														
22	H1 House semi	2	2	0	Not Acceptable	1													
23	H1 House semi	2	2	0	Not Acceptable	1													
24	B5 Bungallow	2	2	0	Accept Provisional			1							1				
25	B5 Bungallow	2	2	0	Accept														
26	Bungallow	1	2	0	Accept														
27	Bungallow	1	2	0	Accept														
28	H1 House semi	2	2	0	Accept														
29	H1 House semi	2	2	0	Accept														
30	H1 House semi	2	2	0	Accept														
31	H1 House semi	2	2	0	Accept														
32	H1 House terrace	2	2	0	Not Acceptable	1													
33	H1 House terrace	2	2	0	Not Acceptable	1													
34	H1 House terrace	2	2	0	Not Acceptable	1													
35	H1 House terrace	2	2	0	Not Acceptable	1			1									1	
36	H1 House terrace	2	2	0	Not Acceptable	1			1									1	
37	H1 House terrace	2	2	0	Accept														
38	H1 House semi	2	2	0	Accept														
39	H1 House semi	2	2	0	Accept														
40	H3 Palmerston semi	3	2	0	Accept														
41	H3 Palmerston semi	3	2	0	Accept														
42	H3 Palmerston semi	3	2	0	Accept														
43	H3 Palmerston semi	3	2	0	Accept														
44	H3 Palmerston semi	3	2	0	Accept														
45	H3 Palmerston semi	3	2	0	Accept														
46	H2 Portland semi	3	2	0	Accept														
47	H2 Portland semi	3	2	0	Accept														
48	Flat Ground	1	2	0	Not Acceptable														1
49	Flat 1st Floor	1	3	0	Not Acceptable														1
50	Flat 1st Floor	1	3	0	Not Acceptable														1

51	Flat Ground	1	2	0	Not Acceptable										1	
52	B6 Bungallow	2	2	0	Accept Provisional						1					
53	B6 Bungallow	2	2	0	Accept Provisional						1					
54	Bungallow	1	2	0	Accept Provisional						1					
55	Bungallow	1	2	0	Accept Provisional						1					
56	H2 Portland comer	3	2	0	Accept Provisional			1								
57	H2 Portland comer	3	2	0	Accept											
58	H2 Portland semi	3	2	0	Not Acceptable	1										
59	H2 Portland semi	3	2	0	Not Acceptable	1										
60	H2 Portland	3	2	0	Accept Provisional			1								
61	H2 Portland semi	3	2	0	Accept											
62	H2 Portland semi	3	2	0	Accept											
63	H5 Calabria semi	2	2	0	Accept											
64	H5 Calabria semi	2	2	0	Accept											
65	H6 Walpole semi	3	2	0	Accept											
66	H6 Walpole semi	3	2	0	Accept											
67	H5 Calabria semi	2	2	0	Accept											
68	H5 Calabria semi	2	2	0	Accept											
69	H5 Calabria semi	2	2	0	Accept											
70	H5 Calabria semi	2	2	0	Accept											
71	H5 Calabria semi	2	2	0	Accept											
72	H5 Calabria semi	2	2	0	Accept											
					Total	10	1	6	1	2	6	2	2	4	1	
Total number of units		72		Percentage		13.9%	1.4%	8.3%	1.4%	2.8%	8.3%	2.8%	2.8%	5.6%	1.4%	



*Figure 5 Grade 1 Listed Church of St Peter, Easton*

