



Holt Draft Development Brief Consultation

Land at Heath Farm / Hempstead Road

Responses to Public Consultation

22 April - 20 May 2013

Report of Representations

Holt Draft Development Brief Consultation, Land at Heath Farm / Hempstead Road

The Draft Development Brief for Land at Heath Farm / Hempstead Road, Holt was published for 4 weeks public consultation from 22 April to 20 May 2013. A total of 20 representations were received during this period. This document is a complete report of all representations received and duly made.

The tables in this document display the content of each representation, showing the representation number and the name of the person or organisation making the comment. It shows the nature of their representation (support, comment or object). Please note that this is an officer's interpretation of the representation.

This report will be made available to Council Members for discussion in relevant Committee meetings and will be publically available.

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Report of Representations

Holt Draft Development Brief Consultation, Land at Heath Farm / Hempstead Road

Comment ID	Name	Organisation	Objection/ Support/ Comment	Comments
HOL001	Philip Raiswell	Sport England	Comment	<p>Thank you for consulting Sport England on the above Development Brief. Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Development Brief reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'Playing Fields Policy – A Sporting Future for the Playing Fields of England'.</p> <p>http://www.sportengland.org/facilities_planning/planning_applications/playing_field_land.aspx</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below (although please be aware that this is in the process of being updated to reflect revised planning guidance):</p> <p>http://www.sportengland.org/facilities_planning/developing_policies_for_sport.aspx</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Development Brief reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.</p>

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				<p>http://www.sportengland.org/facilities_planning/putting_policy_into_practice.aspx If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities_planning/design_and_cost_guidance.aspx</p> <p>If you need any further advice please do not hesitate to contact Sport England using the contact details below.</p>
HOL002	Sally Anne Longden		Comment	<p>You have asked for comments on how the site will be developed. I have a few suggestions (quite apart from thinking good quality farm land should not be developed, thus enabling various governments to keep adding to our population via unrestricted immigration) as follows:</p> <ol style="list-style-type: none"> 1. Why are none of the plots available for self-build for which there is such a demand (including my husband and me).? In other countries the roads and plots are laid out, with services to the front, and either people self-build or employ an architect. Quite frankly, most of the new-builds from major house providers are badly designed with poorly proportioned rooms to boot, and it is not good saying "oh well they all sell out", that is only because there isn't any choice in the matter for the purchaser. It is not rocket science to lay out a house with regard to the sun's movement, and how people actually live, with proper attention paid to storage and utilitarian spaces. 2. Why the 'curly -wurly' road layout? All that means is that some plots have overshadowed gardens and darkened rooms. Plus houses set out in the middle of each plot means two virtually unuseable side returns instead of one useful one. Why not have houses towards one edge, they still have the same distance between, but crucially a large side return to utilise. 3. I would hope that all dwellings have a proper bit of garden; a covered rear porch or separate utility room to dry laundry; and a front vestibule in front of the entrance to the house, in which to take off wet gear, hang up coats, store baby buggies etc. I would hope for a minimum of Parker Morris standards and a bedroom only described as such when it can contain a bed (not having to be placed under a window) with space on three sides to walk around in, plus a side table, four feet of hanging space minimum, and a chest of drawers per person.

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				<p>4. Please ask that the pavements and driveways are water permeable, and that each house has proper floors, not silly 'chalet' roofs forcing folk to live with difficult dormer windows, sloping ceilings and no attic storage space.</p>
HOL003	Patrick Gurner		Object / Comment	<p>My wife and I own a property at Hempstead Road in Holt. I have a number of concerns relating to the draft Development Brief for Heath Farm/Hempstead Road (February 2013), which I have set out below. I particularly object to the concentration of B1/B2/B8 uses on the Hempstead Road frontage.</p> <ol style="list-style-type: none"> 1. The supporting text to Policy H09 requires the removal of heavy goods vehicles from Hempstead Road and the early provision of traffic management measures in Hempstead Road. The concentration of B1/B2/B8 uses on the Hempstead Road frontage, as shown on the Illustrative Masterplan (Fig 1), will encourage more HGV traffic onto Hempstead Road from the existing Bypass junction and make the delivery of traffic management measures more difficult to achieve. 2. The draft Development Brief appears focussed on achieving a housing estate that looks in on itself and relates to the proposed Link Road, rather than delivering comprehensive development that relates well to Holt. This is clearly illustrated by the Phasing Plan (Fig 6) which does not attempt to phase the land that connects Holt to Heath Farm, increasing severance rather than delivering connectivity and integration. 3. An attractive residential frontage would be preferable on Hempstead Road, with access into southern housing areas providing opportunities for lit and over-looked pedestrian and cycle routes towards Hempstead Road. These routes would complement the direct pedestrian /cycleway connection to the Hempstead Road underpass, required by Policy H09(f), which runs parallel to the Bypass (Fig 1). 4. As well as being direct, the H09(f) pedestrian/cycle link should be lit and over-looked by houses for as much as possible along its length. This would encourage personal security and active use during the poor daylight conditions of winter mornings and late afternoons. This primary pedestrian/cycleway link should be available from first occupation of th development, to discourage car use and to encourage sustainable travel. The secondary pedestrian/cycle route south via Hempstead Road would not be 'direct' and would not fulfil the H09(f) policy requirements. 5. The Phasing Plan (Fig 6) and the Illustrative Masterplan (Fig 1) appear contrived to make access to Hopkins Homes land difficult. There is no particular need to lay out

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				<p>the open space as proposed on Figure 1 and a corridor which linked towards the Country Park would be beneficial. Housing would, in any event, be preferable on the Hempstead Road frontage.</p> <ol style="list-style-type: none"> <li data-bbox="1099 384 2145 507">6. Hopkins Homes appear to be a reluctant partner in the preparation of the draft Development Brief. Not all of the technical assessments cover Hopkins Homes land; they are not included in the phasing and access assessment (Fig 6); and the Illustrative Masterplan is contrived to make access to their land difficult. <li data-bbox="1099 539 2145 751">7. Paragraph 6.8 of the draft Development Brief explains the intention that the Link Road will be complete from the Bypass to Hempstead Road no later than the completion of 200 dwellings. This proposal is not consistent with the supporting text to Policy H09, which requires the removal of heavy goods vehicles from Hempstead Road and the early provision of traffic management measures in Hempstead Road. The early construction of the Link Road is particularly important to Holt Town Council and the Link Road should be complete and open to traffic prior to first occupation. <li data-bbox="1099 783 2145 938">8. The draft Development Brief does not explain how bus services will be provided for the site to comply with the sustainable transport requirements of Policy H09(a). Paragraph 5.8 notes that the Link Road would have the benefit of diverting buses and HGVs from Hempstead Road to the A148, but no details of any possible service route or timetable are given. <li data-bbox="1099 970 2145 1125">9. The County Highways submissions on the Site Allocations DPD, dated November 2007 (see pages 22 and 23 enclosed), refer to the H09 site as remote and trips by private car as inevitably the preferred mode of travel. NCC consider the site poorly located for public transport and new provision in terms of service and bus stop infrastructure would be needed. <li data-bbox="1099 1157 2145 1337">10. Chaplin Farrant's statement on behalf of the H09 landowners dated the 25th June 2010, responds to the Site Allocations DPD Inspector's Questions (see pages 8 and 11 enclosed). Their response to Questions 2.4(xii) and 2.5(xiii) address County Highways concerns and explains how existing bus services will be re-routed and extended into the proposed development area. The draft Development Brief is silent on this previous commitment. <li data-bbox="1099 1369 2145 1428">11. To avoid travel behaviour being primarily car-based, and to overcome County Highways stated concerns, buses services should be provided from first occupation.

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				In summary, the draft Development Brief (February 2013) does not deliver a plan for comprehensive development and does not commit to the early delivery of the Link Road from the Bypass to Hempstead Road nor the early delivery of the necessary direct pedestrian / cycle link to the town centre and the required bus services.
HOL004	Miss L Lyons		Object	Holt is a small country town and 290 homes is far too many. The town will suffer as a result of this building. I can understand some building extension of industrial area and some homes perhaps one third of the proposed total.
HOL005	Mrs P Hawkins		Object	For a relatively small town like Holt 290 homes are far too many. We have not got the infrastructure for that amount. Once you start building on green fields it goes on and on and Holt and the surroundings will be ruined.
HOL006	Susan Westbrook & Diana Prentice		Comment	In all recent developments there has been no mention of increasing the medical practice or schools. Open spaces in Hopkins Development (current) i.e. Neil Av have caused more trouble than anything else i.e. it seems an individual has to contact the Council to alter the amenity area to suit them! E.g. grass cutting, height of hedges and creating new shrub areas all without consultation. Will this happen in this new development?
HOL007	Louise Glover		Support	I am the current owner and occupier of the land and business as follows: Grindstone Ltd, 2 Heath Drive, Holt. I strongly support the development proposals for the above land. As an employer in a young, growing business it is becoming increasingly difficult to recruit due to the lack of affordable housing in the local area. Staff are having to drive up to 20 miles to reach us and understandably it is easier for them therefore to work in towns like King's Lynn and Norwich. Holt is in definite danger of becoming a stagnant retirement town without new housing and business opportunities.
HOL008	Peter Gooden		Support / Comment	<ol style="list-style-type: none"> 1. I am in favour of the majority of the development at Heath Farm. 2. Bringing any employment development to the site, despite the most favourable terms, will I think, prove very difficult in this area because of its isolated locality – far from coastal ports, Norwich & King's Lynn, the present site, with land to spare, lost 2 of its better companies. What a pity the District Council turned down Structure Flex's plan.

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				<p>We lost the biggest employer who is doing extremely well in Melton Constable.</p> <ol style="list-style-type: none"> 3. The excellent primary school had a good number of vacancies. 4. Unless a bar on HGV's in Hempstead, Charles & Coronation Roads is put in place, Charles Road will have an increasing number of HGV's using it as a short cut. The snag is that buses serve those roads and are well used, especially by the elderly. Is a plan to allow only buses to continue using the route possible? 5. The introduction of a 'superstore' on the Thaxter's site – with 80 parking spaces will make the junction with the A148 lethal without a roundabout. 6. A new Tesco in Sheringham will, I fear, prove more attractive than Holt with its parking problems – 10 minutes on the A148 + free parking. <p>No doubt other 'fors' and 'againsts' will come to mind.</p> <ol style="list-style-type: none"> 7.
HOL009	Mrs P White		Comment	<p>I am very concerned about the pedestrian and cycle access as planned, particularly the crossing point across Hempstead Road to the underpass. As you can see from my sketch, my house is at this very point with my kitchen window overlooking the end of the path and the Hempstead Road junction with the A148.</p> <p>At the moment, we have quite a large number of pedestrians using exactly this path, crossing the road literally yards from my home! My husband and I use the underpass to get to Holt so we are very aware of how dangerous the traffic in both directions can be – this particularly so for a lot of elderly people, mothers with prams and young children, dog walkers and school children. Traffic on A148 coming towards Holt comes around the corner often at speed while visibility up Hempstead Road is poor in both directions, plus traffic for Old Station Way.</p> <p>The deeds of my property show that the boundary extends to a point where currently people stand to cross the road. I do hope that someone from the Road/Transport/Highways Dept will have a further look at the current suggestion.</p>
HOL010	Sue Bull	Anglian Water Planning Liaison Manager	Comment	<p>Thank you for the opportunity to comment on this document.</p> <p>5.54 ' Water meters will be installed in all homes to encourage occupants...' this is not optional, it is a statutory requirement under the Water Industry Act 1991 (Part 3, Chapter 2, Section 47) for all new water main connections to be fitted with a meter.</p> <p>5.59 Early engagement is key to ensuring adequate surface water management measures are included.</p>

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				<p>5.60/5.61Kingdom TP submitted a pre planning enquiry and as a result Anglian Water carried out an assessment that identified a foul drainage strategy that included the requirement for foul network upgrades. The developer will need to requisition the upgrades that will provide capacity for the proposed development.</p> <p>Holt Sewage Treatment Works currently has capacity to treat the flows from the proposed development.</p>
HOL011	Wendy Richley		Comment	<p>I am concerned to read that specific mention has been made of allotment provision but no mention of children's play area – which is currently underprovided for south of the town. Infrastructure – no mention of health / social care provision other than a nursing home. No mention of education provision – will current primary school places be sufficient? Public parking not addressed. Public transport improvements not addressed.</p>
HOL012	Bob Cummings		Object	<p>Whilst I recognise that this process is to invite comments on the Brief, not to consult on the actual decision to develop the land, I do believe that such a large development will be detrimental to the unique character of Holt and to the current residents of the town and the immediate surrounding areas.</p> <p>My key comment on the proposed Development Brief is with regard to the proposal to build up to 290 residential properties.</p> <p>As we are all acutely aware, car parking in the town struggles to meet current demand outside of school holiday periods and, within those holiday periods the car parks are overwhelmed. If each of the proposed new properties has just one car (and a large proportion are likely to have two), then that is potentially another 290+ vehicles, using the existing inadequate facilities. (Local discussions with regard to additional car parking for the town have been ongoing to no avail and, again if anything is to be done, then it needs to be sympathetic to the lovely character and atmosphere of Holt, which is the very thing that attracts people to live here and to visit in large numbers.) The additional vehicles would make parking impossible.</p> <p>Although the proposed development would be within walking distance of the town, human nature is such that people would wish to drive in to shop.</p> <p>I therefore wish to object to the proposed plan for residential properties, as it currently stands.</p>

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HOL013	David Hurdle	David Hurdle Transport Planning Consultant	Comment	<p>I write these as a resident of North Norfolk who frequently visits Holt and as a local transport consultant very interested in sustainable development. I have used the brief's paragraph numbers -</p> <p>5.8 The only place where buses seem to be mentioned. There does not seem to be much emphasis on minimising car use yet Holt has too much traffic and the development will create more. Effort must be made to secure the provision of a good, attractive bus service. Has discussion taken place with potential operators? This is essential at the pre-application stage. Bus provision and facilities must be built in to a planning agreement. Bus routeing and stops must be decided upon before the application is submitted. Certain principles need to apply:</p> <ul style="list-style-type: none"> • Bus access should be better than car access in terms of time taken within and accessing the site. It should be more attractive to use the bus than get the car out. • People should live within 400m walking distance (not 'crow-fly') of a bus stop, ideally 200m. • Bus stops should have comfortable seating (wooden with arms, not hard perches so often built into shelters); real time information displays, lighting, shelter. • Homes and other buildings should have real time bus information. This is perfectly feasible. Developer funding is providing this in Leighton Buzzard, as well as real time information at stops in the town centre. Let me know if you want more information on this. • New residents should receive vouchers for bus travel and a travel pack of information. • Buses should be operating when the first buildings are occupied not when the whole site is complete, so people don't get into the habit of using their cars from 'day one'. <p>If a small 'hopper bus' materialises to serve the site and various parts of the town, then consideration should be given to:</p> <ul style="list-style-type: none"> • Serving Weybourne which has no bus link with Holt no doubt due to narrow roads. • Serving the North Norfolk Railway which already sometimes runs a bus from their station to the town centre in the summer; maybe a deal could be struck for the

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				<p>hopper bus to take on that role? A further, related thought is for the car park at the station taking on the function of a park and ride site, thus reducing traffic in Holt.</p> <p>5.11 It will be essential that:</p> <ul style="list-style-type: none"> • All pedestrian/cycle routes are lit. I could not find mention of this. • Safe access is provided to/from the site as well as within it. • Cycle routes within the site should provide shorter access than using a car. • The speed limit within the site should be a self-enforcing 20mph or less so that when using roads cyclists feel safe. <p>A problem with cycle networks is that they are so often incomplete. The opportunity should be taken with this development to secure funding to complete a Holt Cycle Network, i.e. to plug gaps that are off-site.</p> <p>5.13 How many car parking spaces per dwelling will be provided? A brief should specify that but I cannot find details..</p> <p>5.22 & 5.45 Is account being taken, for cycle storage, of the government's Code for Sustainable Homes? See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5976/code_for_sustainable_homes_techguide.pdf</p> <p>6.5 There is no mention of a Travel Plan. This must be done for a development of this scale. I would be pleased to be considered for doing, having specialised in Travel Plans for the last 15 years! A Transport Assessment is not enough.</p> <p>7.3 This omits to mention a good cycling network.</p>
HOL014	Richard Drake, Senior Planner (Minerals and Waste Policy)	Norfolk County Council	Comment	<p>The proposal site is underlain by an identified mineral resource (sand and gravel) which is safeguarded as part of the adopted Norfolk Minerals and Waste Core Strategy, and Core Strategy policy CS16 'Safeguarding' is applicable. Safeguarded mineral resources are derived primarily from the BGS Mineral resources map (2004) as amended by the DiGMapGB-50 dataset. A map showing the safeguarded mineral resource is included with this response*. The site is also close to historic and current sand and gravel workings, and</p>

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				<p>therefore the likelihood that mineral resources underlying the area covered by the Development Brief are viable is greater than if this were not the case.</p> <p>The County Council in its capacity as the Mineral Planning Authority (MPA) would object to any future planning application on this site unless:</p> <ol style="list-style-type: none"> 1. the applicant carries out investigations to identify whether the resource is viable for mineral extraction, and 2. if the mineral resource is viable, the applicant considers whether it could be extracted economically prior to development taking place. <p>It is the view of the MPA that the Environmental Statement in support of a planning application on this site should address the issues above.</p> <p>The development brief should be amended to include information on the presence of safeguarded mineral resources on site, and a requirement for any future planning application to consider prior mineral extraction, as detailed above.</p> <p>The following wording is suggested to be included in the development brief:</p> <p style="text-align: center;">“Mineral resource safeguarding</p> <p style="text-align: center;">Any future planning application would need to contain, within its Environmental Statement, details of investigations to identify if the mineral resource (sand and gravel) underlying the site is viable for mineral extraction.</p> <p style="text-align: center;">If investigations identify a viable resource the ES would need to include an assessment as to whether the resource could be extracted economically prior to development taking place.</p> <p style="text-align: center;">If the resource could be extracted economically prior to development taking place, then this must be carried out in order that the mineral resource underlying the site is not needlessly sterilised (in accordance with NPPF).”</p> <p>A duty is placed upon Local Planning Authorities to ensure that mineral resources are not needlessly sterilised, as indicated in National Planning Policy Framework paragraph 143, and the ‘Guidance on Safeguarding Minerals’ published jointly by DCLG and the BGS. Paragraph 144 of the NPPF states that “When determining planning applications, local planning</p>

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				<p>authorities should: not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes”.</p> <p>The policy section of the development brief does not include reference to the adopted Norfolk Minerals and Waste Core Strategy which forms part of the development plan; it is considered that this section should be revised prior to final publication to take this and the requirements of the NPPF into account in relation to mineral safeguarding.</p> <p>There are opportunities for the sand and gravel from on-site resources to be used in the construction phases of developments. This will improve the sustainability of the project by reducing the need to extract sand and gravel from other locations, reducing the carbon cost of the project by reducing the quantity of aggregate needing to be transported to the site, reducing the quantities of material removed from the site as part of the groundworks operations, and ensuring that resources in other areas are not unnecessarily extracted, so that they can be available to sustain future growth. There are also opportunities on restoration for areas in which mineral has been extracted to form part of sustainable drainage systems, areas for recreation/open space, and/or renewable energy schemes, such as ground source heat pumps.</p> <p>Norfolk County Council as the statutory authority for Mineral Planning in Norfolk notes that North Norfolk District Council did not amend the draft Development Brief for Church Farm, Ingham Road, Stalham following the consultation response dated 25 July 2012, regarding the need to include similar safeguarding requirements, and wishes to bring a number of points to your attention.</p> <p>The Church Farm Development Brief does not indicate that the applicants will need to meet the requirements of Policy CS16 in any future planning application. Such a failure would be likely to result in an objection to the application from the Mineral Planning Authority as the Statutory Authority in Norfolk with regard to Mineral Safeguarding. An application which does not address mineral safeguarding would also be contrary to the NPPF and the Norfolk Minerals and Waste Core Strategy (which forms part of the Development Plan for Norfolk) and potentially North Norfolk District Council could be seen as failing in its duty under paragraph 144 of the NPPF in regard to Mineral Safeguarding.</p> <p>Norfolk County Council as the statutory authority for Mineral Planning in Norfolk wishes to be kept informed as the draft Development Brief for Land at Heath Farm is progressed through the application process, and in particular we wish to be informed of the date of any committee meeting which would be being asked to agree the Heath Farm Development Brief.</p>

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				<p>*The map submitted by Norfolk County Council showing safeguarded areas for Minerals sites is available to view on page 28 of this report.</p>
HOL015	Di Dann	Holt Town Council	Comment	<p>We are writing in response to the Development Brief for the above site and following a recent Town Council meeting. We outline in this letter a summary of our thoughts from that meeting, previous town council meetings going back to 2007, and letters we have received on the proposals.</p> <ul style="list-style-type: none"> • Our members always wished for this site so it provided an opportunity for jobs and housing for local people, and because they saw it as a way of alleviating the problems of the Hempstead Road traffic. This means we want to see jobs which are not necessarily in the service sector (e.g. a Care Home) and it means houses which can be bought by local people and are not expensive retirement homes for those that might wish to retire to our lovely town. The indicative plan gives no firm promises of either. • The display made by the developers had a short list of threats and a long list of opportunities from the development. The short list of threats did not include any mention of the biggest problem we have in Holt which is the lack of car parking. This development will add to this problem. People living or working on the site will not walk into town. • The site, as proposed, will make this a separate community to Holt. Greater efforts need to be made to ensure that it is part of our community. • It is known that development of the existing industrial area on Hempstead Road is strangled financially by the present owner. This has been the case for a number of years. We have concerns that this situation will remain, even with the extended area as proposed on the indicative plan. • We are concerned that the site will be inadequately resourced for open space areas, play facilities. • We are concerned that links to the town will not be constructed as a first priority. <p>Having identified the above as concerns, we have thoughts as to how these concerns can be addressed through the design, priorities and the resources given over to the site as soon as</p>

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				<p>possible:-</p> <ol style="list-style-type: none"> <li data-bbox="1099 323 2170 539">1. Housing providing opportunities for local people must be provided. Detached four bedroom properties with 2 garages are not the answer to this problem. There must be a mix of housing as well as the affordable housing and housing should have areas for cars to park. The HGV restriction and the Infrastructure into the new site must be done as priorities of Phase1. Car parking spaces must be provided with houses, and there must be adequate parking for workers on the industrial area. We already have a problem on the existing industrial site with workers' vehicles. <li data-bbox="1099 571 2170 874">2. As far back 2010 we were told by NNDC officers that Holt will, in the future, be expected to provide employment not only for the people of Holt but also for the neighbouring towns of Sheringham and Cromer. We would hope, and expect, North Norfolk District Council to provide encouragement for industry and employment to come to Holt as it has Fakenham and North Walsham in the past. Industry and employment must be enterprise with training opportunities. NNDC must be seeking to improve the level of support offered to existing non retail and tourism businesses to ensure that they remain in the town and seek to facilitate the growth and expansion of these sectors (refer "A Vision for Holt " Strong economy and thriving community). The designated H09 site is identified in the Vision for Holt for this development. <li data-bbox="1099 906 2170 1185">3. The Brief must ensure that the route through the site is able to take a bus service and that the infrastructure needed is in place as a priority – lighting, shelters and seats, information points, accessibility and pull in areas. They must also provide money to help establish a "hopper" type bus service to help link the town, Kelling surgery and the H09 site. This will minimise the impact of additional car parking problems which this site will impose on the town. It is essential that all of this is provided from first occupation. It is important that this service is operating as soon as possible and certainly by the time the first houses are occupied. It is vital to establish the early habit of using the service rather than the car. <li data-bbox="1099 1217 2170 1369">4. A cycleway and footpath into town and the Country Park are priorities at the outset. Routes should be made as safe as possible and should be set out to encourage use with well-lit cycle tracks. Speed limit within the site should be a self-enforcing 20 mph. Along with this there should be street furniture - cycle stands, litter bins, maps and information points and benches. <li data-bbox="1099 1401 2170 1428">5. The proposed Industrial area must not be constrained like the present Hempstead

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				<p>Road Industrial area. We understand that businesses are making enquiries to move to the new site but no encouragement has been given by the landowner. The Sanders Coach Company wishes to move onto the area designated on the indicative plan B1 but we understand that this request has not been well received. This may be because the B1 strip of land proposed to the north of the Industrial area is seen as a buffer against the adjacent Residential area A. Sanders are a main employer of our town and immediate area, they are also the company which will provide our hopper service. Sanders should be encouraged in their expansion. Their present problem is insufficient parking for their staff vehicles. Currently cars are parked on either side of the road leading from their site onto Hempstead Road. Unless this parking situation is resolved the through route will never become possible!</p> <p>6. Thurlow Nunns have a petrol filling station and shop on the Old Cromer Road in town. The limited space on the Cromer Road forecourt creates problems in town with vehicles parking along the road waiting to use the filling station. This business would be ideally situated near to the By-Pass roundabout.</p> <p>7. The design, installation and management of the open space areas including allotments should be something which the community is involved with at the outset. Sufficient funds should be allocated locally towards its upkeep.</p> <p>The site proposals have the opportunity of addressing some key problems which we have in the town, and we hope that this can be built into the Development Brief. We do not want to see existing problems worsened.</p> <p>We trust that the above will be considered by you in the revision of the Brief.</p>
HOL016	John Hiskett	Senior Conservation Officer, Norfolk Wildlife Trust		<p>Thank you for consulting Norfolk Wildlife Trust on the development brief. On the basis of the information provided and our knowledge of the adjacent County Wildlife Site we have the following comments to make:</p> <ul style="list-style-type: none"> • We note that Policy H09 includes clauses to buffer the CWS and to secure management of the CWS. We fully support these aspects of Policy H09. This may need to include fencing of the CWS in order to facilitate management of the site. We will respond further on this issue at the outline and detailed planning stages. • We also support the proposals under paragraph 3.19 and 3.20 to carry out an ecological assessment and subsequent mitigation, if required, of land to the east of

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				<p>the CWS, part of which is designed to act as a buffer to the CWS.</p> <ul style="list-style-type: none"> In our view, all of the POS to the west of the development, including the buffer to the CWS should be developed and managed as a semi-natural green space, as far as is practical, after allowing for pedestrian and cycle access links.
HOL017	Laura Waters, Infrastructure and Economic Growth Planner	Department of Environment, Transport & Development, Norfolk County Council		<p>Economic Development The actual employment allocation would seem to be a sensible amount. This will be largely for local employment, although given its attractiveness the town may provide a suitable location for an inward investor, especially if they already have a second home in the area for instance. The NNDR around Norwich when built may also make the town more accessible (and other parts of Norfolk more accessible from Holt). As such it may experience further growth as a result, although not as much anticipated at places such as Aylsham.</p> <p>However, the B1/B2/B8 allocation does seem to butt up against the proposed 3rd phase housing area and should some sort of buffer should be introduced.</p> <p>Finally, in Para 2.7 the definition of the word "quantum" needs to be checked.</p> <p>Estates Whilst the overall brief offers a possible vision for a phased development, it appears dependent upon the use of Norfolk County Council owned land (marked in olive green on the attached plan). Various illustrations / references in the draft Brief (including Figures 1 and 3 as well as Para 5.11) make reference to the provision of a route / link over NCC owned land (outside the brief site). NPS are not aware of any detailed discussion with NPS on behalf the landowner and no terms or mechanism has been proposed or agreed to allow access over this land. This NCC land (marked olive green) has previously been promoted for housing in the LDF process and would not wish to see any use / access route / link that may prejudice or impact on the long term potential of this site for an alternative, more valuable, use.</p> <p>In view of the above, it is considered that reference to this link / route should be deleted at this stage from the Brief and also any potential early planning application.</p> <p>Children's Services It's conceivable that Holt Primary School could be expanded to 315 places, although the capacity would have to increase by at least another 3 classrooms. There are a couple of possible locations for a new block, but each would have its own complications. The site</p>

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				<p>slopes and a proper feasibility study would have to be commissioned to identify any potential obstacles; drainage routes, cabling, underground structures etc. It is highly likely that build costs will be higher than normal. It's also likely that any location chosen would have a knock-on effect on the rest of the school and could exacerbate the existing limitations of the site. The additional impact on traffic and parking could also become a factor and site expansion may face objections from Planners and Highways.</p> <p>Minerals and Waste It is understood that the Minerals & Waste comments have been sent through to you separately.</p>
HOL018	Martin Barrell, Planning Liaison Technical Specialist	Environment Agency	Comment	<p>Contaminated Land Policy HO9 from the Site Allocations DPD, usefully reproduced as part of this document; states that the development of the site will include "Investigation and remediation of any land contamination".</p> <p>For information, the site is located on superficial deposits of sand & gravel, designated as Secondary 'A' Aquifer, overlying the Chalk Bedrock, designated as Principal Aquifer. It is situated within Groundwater Source Protection Zone 3 and there is a licensed groundwater abstraction borehole located approximately 250m to the north east.</p> <p>Any development proposed for this site must therefore address the potential impacts on groundwater and surface water quality during construction and operation. This will include from the potential mobilisation of any contaminants that may be associated with the site, and the disposal of any potentially contaminated surface water from the development.</p> <p>Regarding land that may have been affected by contamination as a result of its previous use (or that of the surrounding land); sufficient information should be provided with any planning application, in the form of a Preliminary Risk Assessment. This will include a desk study, conceptual model and initial assessment of risk to provide assurance that the risks to controlled waters are fully understood and can be appropriately and adequately addressed.</p> <p>The document indicates that although the site is predominantly undeveloped agricultural land, it does include some areas of potentially significant sources of contamination; in particular the presence of a haulage yard and historic landfill site.</p> <p>Paragraphs 3.13-3.15 state that part of the site has been subject to a Phase I and Phase II geo-environmental assessment (2012), and the associated ground investigation undertaken</p>

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				<p>did not identify any significant risks to potential receptors at the site, including controlled waters. However, the part of the site yet to be investigated includes the former haulage yard, which will need to be subject to further investigation, assessment and remediation as necessary.</p> <p>Full copies of any such Phase I & Phase II assessments undertaken should therefore be provided as part of any planning application.</p> <p>Incorporating Sustainability Measures into the Development Paragraph 5.53 indicates the possible use of ground source heat pumps. We broadly support the use and promotion of more sustainable sources of energy, although we wish to highlight that the installation of a Ground Source Heating and Cooling System (GSHC) as part of a development should be subject to the following general requirements:</p> <ol style="list-style-type: none"> 1. The method of installation for a GSHC system must not promote, or provide an on-going preferential pathway for, the movement of any near surface soil/water contamination into the Aquifer. 2. The Environment Agency should be consulted on the details of any proposed "Open Loop" GSHC system to ensure pollution of controlled waters is prevented, and any required authorisations or consents for the abstraction and discharge of groundwater are obtained. 3. The construction detail for a "Closed Loop" GSHP system must ensure that any potential failure in the integrity of the system during its operation does not pose an unacceptable risk of contamination entering the groundwater. <p>Reference should also be made to our "Groundwater Protection: principles and practice (GP3), Ref: LIT 7562 November 2012, Version 1, for our position statements R1-R6 regarding this issue, and our associated guidance document "Environmental good practice guide for ground source heating and cooling", Ref: GEHO0311BTPA-E-E.</p> <p>Sustainable Urban Drainage Strategy We support the requirement for SUDS to be used to drain the surface water from the site as included in paragraphs 5.58-5.59. As outlined in the priority stipulated in Part H of the Building Regulations, the SUDS features should drain using infiltration where soil and groundwater conditions allow.</p>

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				<p>The SUDS management train should be used within the site to mimic the natural processes as closely as possible. This concept is fundamental to designing successful SUDS. It uses drainage techniques in series to incrementally reduce flow rate, volume and pollutants. The hierarchy of techniques that should be considered in developing the management train are prevention, source control, site control, regional control. Prevention can be achieved by the use of good site design and good housekeeping. Source control can be achieved by controlling of runoff at or very near its source (e.g., soakaways, other infiltration methods, green roofs, pervious pavements). Site control can be achieved by management of water in a local area or site (e.g., routing water from building roofs and car parks to a large soakaway or infiltration basin). Regional control can be achieved by management of runoff from a site and several sites (e.g., in a balancing pond).</p> <p>It would be beneficial to include above ground infiltration features such as basins and trenches within the SUDS scheme, as these offer biodiversity and amenity benefits as well as the flood risk reduction functions. As such, a well considered SUDS scheme can have a key role in the delivery of “high quality, connected, multi-functional and biodiverse open green spaces”; as expressed in the Vision at paragraph 4.2 and expanded upon in Table 1 Section 5 key development framework principles. Also given the low current ecological value of the site (as stated within paragraphs 3.16-3.20), the incorporation of such SUDS systems is likely to present an opportunity to retain any existing features and provide enhanced habitat within the site for some of the species currently found at the fringes.</p> <p>It may also be easier for these features to be maintained by a management company, than individual soakaways. Alternatively if soakaways are proposed it would be preferred if these were shared features, with a maintenance company maintaining them, rather than relying on individual property owners to undertaken maintenance.</p> <p>Where soakaways or other infiltration systems are proposed for the disposal of surface water, consideration should also be given to the implications for water quality and groundwater in particular. Our general requirements in that respect are as a follows:</p> <ol style="list-style-type: none"> 1. Soakaways or other infiltration systems shall only be used in areas on site where they will not present a risk to groundwater, with the depth of soakaway kept to a minimum to ensure that the maximum possible depth of unsaturated material remains between the base of the soakaway and the top of the water table, ensuring that a direct discharge of surface water into groundwater is prevented. 2. Soakaways shall not be constructed in land affected by contamination, where they

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				<p>may promote the mobilisation of contaminants and give rise to contamination of groundwater.</p> <ol style="list-style-type: none"> 3. Only clean water from roofs shall be directly discharged to soakaway. 4. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures. <p>Further to these requirements, our Groundwater Protection: Principles and Practice document (GP3:2012) includes the following our position statement for the use of SUDS:</p> <p>Position Statement G13 – Sustainable drainage systems</p> <p><i>We support the use of sustainable drainage systems (SuDS) for new discharges. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater.</i></p> <p><i>Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, we will require a risk assessment to demonstrate that pollution of groundwater would not occur. They will also require approval from the SuDS approval body (SAB), when these bodies have been established, to ensure they follow the criteria set out in the SuDS national standards (when published), including standards for water quality, design and maintenance.</i></p> <p><i>For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit.</i></p> <p>Finally, this section does appear to confuse water efficiency measures with sustainable drainage techniques. We welcome the proposal to reduce water consumption and retain rainwater within the site where feasible, such as through the use of water butts and rainwater harvesting. We also welcome and support the inclusion of the water conservation objectives in paragraph 5.54. However, the use of water butts and rainwater recycling cannot be taken into account in the design of a SUDS scheme as we have to assume that such features are already full prior to a rainfall event. Therefore, we would suggest that water efficiency is expanded upon in a separate section.</p>

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				<p>Foul Water Drainage Strategy & Utilities</p> <p>The proposed development brief includes the text of Policy H09, which sets out the main water quality concern in terms of the need to overcome the potential constraints at Holt sewage treatment works (STW) as sites come forward across Holt.</p> <p>While this development brief is for a specific parcel of land, it is considered appropriate for it to incorporate a more town-wide strategic view of certain issues such as the provision of waste water treatment, to ensure that the issues and potential constraints are presented adequately.</p> <p>Paragraphs 5.60 and 5.61 as currently drafted do not highlight the potential constraints at Holt STW, which are that in order to deliver the full quantum of growth proposed across the town; improvements will need to be made at the works in order to accommodate increases in the waste water flows, whilst ensuring compliance with the Water Framework Directive. Bullet point 'h' of the Site Allocation Plan Policy H09 refers to this constraint, and this should be further highlighted in paragraphs 5.60/ 5.61 of the development brief.</p>
HOL019	Steph K		Comment	<p>How this site will change the back of Gravel pit lane gardens. My comments & i would like answers on the brief & my universal concern, flooding of our land due to the housing, how the perimeter border or landscape buffer will be addressed, the proximity of the houses & will they be able to overlook our land, land contamination, height & the change in vista or view from both house & garden, noise level increasing, increase in traffic, timescale plan of works, how long in total & each phase from start to finish & ecological value as we have both toads & newts in our garden. or as you suggest? what is the plan & position of the residential houses in this area, this is not clear from your drawings & location of phone mast (will this stay or be moved).</p>
HOL020	Anne & Simon Harrap		Comment	<p>We would like to comment on the outline proposals from the point of view of the Gravel Pit Lane County Wildlife Site, which adjoins the proposed development.</p> <p>As the occupiers of the County Wildlife site (which we have rented from NNDC for over 25 years) we have always allowed public access. We would not wish to prevent any access should these developments go ahead, but need to prevent easy, casual access, because to safeguard the conservation interest of the County Wildlife Site it is essential to prevent high levels of trampling and the use of the area as a 'dog toilet'.</p> <p>To do this we suggest that measures should be taken to prevent any pedestrian through-routes, and to prevent direct access from the development. This would have to include both</p>

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				<p>fencing and screening, on the eastern and northern boundary of the country wildlife site (see blue line on attached map; there should be no access from 'other residential' if this development should take place, with covenants places on the houses to prevent any gates / openings into the County Wildlife Site area).</p> <p>Ideally, the pedestrian / cycle route into Holt would be also screened to the south to discourage easy ingress into the area (see green line on attached map, with access also prevented from 'other residential' should this development take place), with the area to the south of the green line all managed for conservation.</p> <p>Please note that the Public Open Space to the north of the county wildlife site is heavily contaminated with broken glass etc (the area was used as a rubbish tip, and is said locally to have been filled with rubbish, possibly toxic / dangerous, from a nearby US airbase after WWII). If used as public open space it would have to be cleared up, but to enhance the county wildlife site any landscaping and / or planting would have to be wildlife-friendly.</p> <p>In order to preserve the open grassland of the country wildlife site increasing management is necessary. The developers should therefore not only fund any fencing / screening to protect the site and decontamination of adjacent areas, but also fund future management of the county wildlife site.</p> <p>*Map submitted by Anne & Simon Harrap showing fencing / screening requirements is available to view on page 29 of this report.</p>
HOL021	John Shaw, Senior Engineer	Norfolk County Council Highways	Comment	<p>(Received and added to this report on 20 June 2013)</p> <p>As you are aware, the Highway Authority provided detailed comments upon a previous draft last November. Many of my concerns have not been addressed but rather the brief appears to be less specific and open to interpretation. I have no real issue with this approach as no doubt the detail can be addressed via the Transport Assessment at a later stage.</p> <p>I would like to recommend the following amendments to the text, removing the words in red and replacing with those in blue:-</p> <p>Page 15 - The Highway Authority is of the view Hempstead Road needs be closed with all traffic diverted along the new link road. We recognise this</p>

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				<p>aspect has not been subject to public consultation and accordingly feel it prudent to keep all options open at this stage. However, the sentence relating to traffic management solutions needs to be expanded to make it clear that whatever solution eventually comes forward, it will need to be a physical measure rather than a prohibition order. Whilst there is still a difference of opinion as to what shape the physical measures should take, nevertheless we are in agreement it needs to be a physical measure.</p> <p>We recommend amending the text as follows:-</p> <p style="padding-left: 40px;">“The proposals will need to include the provision of a link road between Hempstead Road and the bypass, which will have the effect of reducing or removing the level of traffic along from Hempstead Road. Physical traffic management solutions will need to be implemented to reduce the level of remove HGV traffic along from Hempstead Road.</p> <p>Page 16 – The need to reduce HGV traffic isn’t really the vision itself. I think we need to emphasise the end result. Could I suggest something along the following lines:-</p> <ul style="list-style-type: none"> • Reduce the dominance of traffic in the street scene (in particular heavy goods vehicles using Hempstead Road) so that people feel safer when walking or cycling. Incorporate measures to effectively manage/reduce the number of heavy goods vehicles using Hempstead Road. <p>Page 19 – Our Local Member has expressed a desire to protect bus services and I wonder if we could include something along the following lines under the heading of creating a well-connected place:-</p> <p style="padding-left: 40px;">Links by public transport will be considered in the context of the whole journey, integrating seamlessly with other sustainable modes.</p>

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				<p>Page 22 (paragraph 5.10) – As you are aware, the Highway Authority has consistently stated we would not support the proposed south-western residential part of the site being accessed from Hempstead Road. Our concerns summarise as follows:-</p> <ul style="list-style-type: none"> (1) There are poor footway links along Hempstead Road. This conflicts with the vision statement at page 19 of the development brief where it is claimed this development will “provide an attractive well connected pedestrian environment” (2) The details provided to date indicate adequate levels of visibility cannot be achieved. (3) This proposal would lead to an intensification of traffic through the Hempstead Road/ bypass junction. Whilst the junction is currently adequate to cater for existing levels of traffic, we would not wish to see an intensification of use. <p>Subsequent to drafting the development brief, the Highway Authority has re-examined its position. It is now our belief that we would be able to support this proposal if Hempstead Road were physically closed to vehicular traffic, with motorised vehicles diverted along the new link road. Hempstead Road would still remain open for use as a through route by pedestrians and cycles. Closure in this manner would (1) protect pedestrians by reducing traffic (2) Allow an access strategy to be developed that requires shortened visibility splay lines (3) reduce traffic through the above bypass junction.</p> <p>We accept such a proposal has not been subject to public any consultation and our recommendation is that public consultation is sought at an early stage.</p> <p>Without a physical closure, the highway advice remains that access needs to be derived via the eastern part of the site. Accordingly we recommend that the text is amended as follows:-</p>

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				<p>In the event that an access cannot be obtained from Hempstead Road, provision could will be made from the eastern part of the site.</p> <p>Page 27 (para 5.22) - We have experienced significant problems on some new development relating to rear parking courts and garaging. Can I suggest the text is amended to read – "...and communal parking in some conveniently located courtyards and garaging to the rear.</p> <p>Page 29 – (para 5.27) as per page 27 above</p> <p>Page 30 (para 5.30) as per page 27 above</p> <p>Page 31 (para 5.37) as per page 27 above</p> <p>Page 36 (para 5.48) – The Highway Authority will not allow reclaimed timer sleepers within land to be adopted as public highway. The reference to golden gravel needs to be removed in relation to adopted pedestrian and cycle paths.</p>

Attachments

All additional material submitted by consultees as part of their representation is available below.

HOL014

Map submitted by Norfolk County Council showing safeguarded areas for Minerals sites.

