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Mr Geoff Lyon
 North Norfolk District Council
 Planning Section
 Holt Road
 Cromer
 Norfolk
 NR27 9EN

04 December 2019 **Sent by Email**

Dear Geoff,

RE: LAND OFF BERESFORD ROAD, HOLT, NORFOLK – Planning Application Ref: PO/18/1857

We write in respect of the above planning application proposal. In particular, you will recall that during the Planning Committee meeting on 10 October 2019, Councillor Nigel Lloyd expressed some disappointment that there was no reference to the climate change emergency in the officer's report. The Head of Planning provided a verbal response to this comment, which is recorded in the Council's minutes for this meeting as being as follows:

"The Head of Planning explained that given its position with regard to the existing and emerging local plans, the local planning authority had to be guided by National Planning Policy which had not yet caught up with the climate emergency. He was unable to advise the Committee to give material weight in planning judgements to issues that were not currently planning policy"

My concern with the above response is that it doesn't assist Members in fully understanding the sustainability credentials of the application proposals. In order to address this situation, the following summarises how the proposal will result in a sustainable pattern of development and identifies some of the measures that are committed to by the applicant to help tackle the climate change emergency, which go significantly beyond any measures set out in the statutory development plan and have been informed by draft measures in the emerging Local Plan. For the avoidance of doubt, these measures have been allowed for in the scheme viability appraisal.

Location of Site

As a broad matter of principle, the spatial strategy established by the North Norfolk Core Strategy and emerging Local Plan is to direct additional housing growth to Holt (and other Principal Settlements) in order to deliver a sustainable pattern of development; allow people to live, work and undertake recreational activities with a minimal amount of travel; and, enable residents (where travel is required) to make sustainable transport choices. The Core Strategy [para. 2.9.12] makes clear that Holt is a significant importer of employees from other areas. The delivery of additional housing, including affordable housing, as proposed will assist in addressing this imbalance and help reduce the need for travel and vehicle emissions.

The site's location within the town and its connectivity provides opportunities for new residents to access services by walking and cycling and make sustainable transport choices. Bus stops are within easy walking

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distance of the site. The Transport Assessment demonstrates that all facilities in Holt are within walking distance of the site for most people. Linked to this, the LEA has made clear that the proposed site for a new primary school within the development site is particularly well located to serve the school catchment, enabling pupils to be able to get to school without reliance on car borne trips. This point has also been made separately in a letter¹ by Holt Community Primary School and the Governing Body, which confirms that:

“A school in this locality would be very well placed to serve the school catchment area and would support opportunities for children to walk or cycle to school”

A point that was made in the officer’s report for the October 2019 committee was that, if the primary school capacity cannot be increased (and this proposal provides the only realistic opportunity to facilitate this in Holt), an increasing number of children from Holt are going to need to be transported to schools in other settlements (with schools that have capacity), exacerbating unsustainable travel patterns, adding to transportation costs and resulting in increased vehicle emissions.

Electric Vehicle Charging Points

The applicant has had regard to the Council’s emerging Local Plan policy (Policy SD16) on the provision of electric vehicle charging points. Notwithstanding the Head of Planning’s comments to Members that draft policy requirements cannot be insisted upon, the applicant is committed to delivering sustainable development and is prepared to make provision for electric vehicle charging infrastructure within the proposed housing development. In this context, it is proposed that a condition be imposed on any grant of outline planning permission requiring the approval of an electric vehicle charging scheme, which includes making provision for standard electric vehicle charging points to all dwellings with parking within their curtilage (to accord with the requirements of emerging Policy SD16 and the draft accompanying text at paragraph 7.122).

Transportation – Influencing Modal Shift

The outline planning application is accompanied by a Travel Plan, which demonstrates a commitment to minimising the impact on the environment, of travel to and from the site, by encouraging those who have to travel to do so in an environmentally friendly way. The Plan is consistent with the aims of Norfolk’s Local Transport Plan. The Travel Plan measures include providing new residents with a ‘Sustainable Travel Information Pack’ providing forms for subsidised public transport tickets, where the household can make use of these; advisory walking and cycling routes showing links with the development; and car sharing scheme details for those who have no alternative means of travel to the private car. Pedestrian and cycle path infrastructure will be delivered within the application site and a dedicated pedestrian and cycle access to the site is proposed at Lodge Close.

It is also proposed, through the development package, to provide a financial contribution towards the local hopper bus scheme, which will be secured through the Section 106 Agreement. The details of this have been agreed with NCC highways.

Ecology and Biodiversity Net Gains

The officer’s report for the October 2019 committee helpfully confirmed that, subject to the agreed mitigation strategy, there will be no adverse impacts on designated habitat sites, in particular the Holt Lowes SSSI, Norfolk Valley Fens SAC and North Norfolk Coast SPA. However, what was not made clear in the officer’s report is the fact the proposed development (as demonstrated in the Ecological Appraisal) will secure net biodiversity gains, when compared to the current position. This complies with the objectives of emerging Local Plan Policy ENV4.

¹ Letter of 24 October 2019 to NCC

Sustainable Urban Drainage Systems

The application is accompanied by a flood risk assessment and drainage strategy, which has been agreed by the Lead Local Flood Authority. The SuDS strategy allows for infiltration drainage features to be incorporated within the site to support natural infiltration and allows for attenuation basins, swales and permeable paving, suitable for pedestrian or vehicle traffic while allowing surface water to percolate directly into underlying open stone construction. Surface water swales (i.e. linear vegetated channels with a flat base that encourage sheet flow of water through grass or other vegetation) are also proposed, which will be integrated within the Green Infrastructure, to collect, convey and store surface water runoff allowing water to soak into the ground where soil conditions are suitable.

The strategy uses infiltration-based techniques to replicate and increase control of the existing surface water discharge from the site in terms of rates and volumes. A number of treatment processes are to be included to ensure that any discharge from the site to ground has undergone sufficient treatment prior to discharge to the ground and there are no adverse water quality impacts.

The SuDS strategy aligns directly with the Council's drainage and water management objectives for delivering sustainable development and adapting to climate change (see for example the emerging Local plan para. 8.71 / Policy ENV9 [12] / Policy SD10).

Water Efficiency

In terms of securing the efficient use of water in residential dwellings, all new homes have to meet the mandatory national standard set out in Building Regulations of 125 litres per person per day (lpppd). There is an optional water use standard of 110 lpppd. It is this more stringent water efficiency standard that the Council is proposing to take forward in its emerging Local Plan (Policy HOU10). The applicant is committed to delivering housing development that complies with the optional standard of 110 lpppd. It is prepared to accept a condition requiring dwellings to be specified to meet this standard.

Fibre to the Premises Broadband

In line with the emerging Local Plan Policy SD8, the applicant is committed to providing high speed broadband within the proposed development. Broadband is an important element of social and economic infrastructure which key to supporting a sustainable local economy, education and home working and community cohesion. It is also an important component in reducing the need to travel and securing sustainable development.

In direct compliance with emerging Policy SD8, the applicant is committed to ensuring that all new dwellings will be designed and constructed in a way that enables them to meet the Government's building regulations relating to the provision of high speed fibre to the premises infrastructure in the home.

Sustainable Construction, Energy Efficiency and Carbon Reduction

The emerging Local Plan highlights the importance of good design and refers to the Government's objective to increasingly move towards a low carbon economy. It highlights that developments should follow the principles of design set out in the energy hierarchy by prioritising the requirement to eliminate energy need through measures such as design and scheme layout and the use of thermally efficient construction methods and materials.

In respect of the proposed development, the scheme will follow the latest guidance to reduce CO₂ emissions by providing a "fabric first" approach, to (amongst other things) increase insulation and reduce the effects of

thermal bridging; and increase air tightness. As set out in the Energy Savings Trust Guide “Fabric First”, these methods alone can achieve the target of 25% reduction in CO₂ emissions as required for Regulations Part L 2010. To achieve the additional 6% reduction in CO₂ emissions to meet the 2013 Part L Regulations further improvements in fabric first insulation performances, window and door U values and increased air tightness can achieve this requirement, however there may also be a consideration for on-site renewable or low carbon technology as an alternative approach.

As with all outline planning applications, the total reduction in CO₂ emissions that will be possible cannot be calculated until detailed design stage. In order to achieve the reduction in CO₂ emissions committed to, the following techniques will be utilised:

- Walls - Enhanced U Values to be achieved by increasing the size of the cavity walls and increasing the insulation thickness, or alternatively through the use of timber framed construction with the use of high levels of insulation with the timber studwork.
- Roof - Enhanced U Values to be achieved through increasing the thickness of the insulation.
- Floors - Installation of high-performance insulated ground floors will provide enhanced U values.
- Windows and Doors - Utilisation of high-performance glazing will provide improved U values.
- Thermal Bridging – Heat loss will be minimised by employing enhanced constructions details.
- Air Tightness - Following Passive house principles air leakage rates can be significantly improved.
- Ventilation - With enhanced air tightness principles used, appropriate ventilation will need to be installed in line with Building Regulations to provide fresh tempered air.

In addition to the foregoing, the layout and design of the development will maximise the use of passive solar design and shading to address heating and cooling. Buildings can also be specified to include A-rated low carbon boilers (which can include flue-gas heat recovery) and low energy light installation. This would be developed further and confirmed at detailed design stage.

New School Buildings

Whilst the detailed specification for the new school is a matter to be agreed between NCC and NNDC, any new school building designed to meet or exceed Building Regulations would far outperform the existing historic school buildings on energy efficiency and sustainability grounds.

Concluding Comments

Overall, it is considered that the application proposal will secure a highly sustainable form of development that will deliver additional housing and a serviced school site whilst having excellent sustainability credentials and responding positively to the climate change emergency. The applicant has committed to a range of measures intended to reduce energy use and carbon emissions. The package of measures identified goes well beyond any measures set out in the statutory development plan. We would be obliged if the above points could be set out as appropriate in the officer’s report so that Members are aware of the steps being proposed.

Your sincerely



John Mackenzie
Planning Director

cc. Cllr Nigel Lloyd (by email only)