

ITEM:		RECOMMENDATION:	REFUSAL
REF NO:	3PL/2019/0313/O	CASE OFFICER	Rebecca Collins
LOCATION:	WEETING The Old Station Yard Mundford Road Weeting Brandon	APPNTYPE:	Outline
APPLICANT:	L & V Timber The Old Station Yard Mundford Road	POLICY:	Out Settlemnt Bndry
AGENT:	Nigel Hurrell N H Building Design 18 Plassett Drive	ALLOCATION:	N
PROPOSAL:	Residential Development (13 dwellings)	CONS AREA:	N
		LB GRADE:	N
		TPO:	N

REASON FOR COMMITTEE CONSIDERATION

The application is, as defined by the scheme of delegation, a major planning application and is therefore referred to Planning Committee for this reason.

KEY ISSUES

Principle of development
Loss of employment site
Access
Layout and Design
Amenity
Heritage assets
Ecology
Flood Risk and Drainage
Trees
Open Space
Contamination

DESCRIPTION OF DEVELOPMENT

Residential Development (13 dwellings).

SITE AND LOCATION

The application site is located to the east of Mundford Road, to the north of Brandon and to the north of Brandon Station.

The site is located in a designated employment area with the station to the south and other

industrial/employment uses to the norther of the site. There are residential properties in fairly close proximity, including a row of historic terraces fronting onto Mundford Road to the south, opposite the access to the station, 'Redbrick Cottages' a row of terrace properties to the east, off the access to the site and residential properties to the north of the site, off Mundford Road.

The site is reasonable flat with an existing access off Mundford Road. There are some open frame and smaller building across the site. There is a post and wire fence on the southern boundary of the site, adjacent to the access to properties at the rear and a concrete wall to the northern boundary. There are a few small trees to the boundaries of the site.

EIA REQUIRED

No

RELEVANT SITE HISTORY

3PL/2018/0580/O Withdrawn 27-07-18

Demolish light industrial units and erection of 13 dwellings

POLICY CONSIDERATIONS

The following policies of the adopted Breckland Core Strategy and Development Control Policies and the adopted Site Specific Policies and Proposals Document, including the Proposals Maps, have been taken into consideration in the determination of this application. The provisions of the National Planning Policy Framework and National Planning Policy Guidance have also been taken into account, where appropriate

CP.01	Housing
CP.03	Employment
CP.04	Infrastructure
CP.05	Developer Obligations
CP.06	Green Infrastructure
CP.09	Pollution and Waste
CP.10	Natural Environment
DC.01	Protection of Amenity
DC.02	Principles of New Housing
DC.04	Affordable Housing Principles
DC.06	General Employment Areas
DC.11	Open Space
DC.12	Trees and Landscape
DC.13	Flood Risk
DC.16	Design
DC.17	Historic Environment

DC.19	Parking Provision
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

OBLIGATIONS/CIL

The application would be required to provide affordable housing and open space, in accordance with adopted policy.

CONSULTATIONS

ANGLIAN WATER SERVICE

The foul drainage from this development is in the catchment of Weeting Water Recycling Centre that will have available capacity for these flows

The sewerage system at present has available capacity for these flows via a gravity discharge regime.

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets.

NATURAL ENGLAND

As submitted, the application has potential to have a significant effect (and potentially an effect on the integrity) of Breckland Special Protection Area (SPA). It also has potential to have a significant effect on Breckland Forest Site of Special Scientific Interest (SSSI).

Natural England is currently of the view that, based on the information provided on the proposed development, a likely significant effect on Breckland Special Protection Area (SPA) cannot be ruled out either individually or in combination with other plans or projects. Our concern is based on the fact that the proposal is entirely within the 400m Breckland Forest SSSI zone, put in place to protect the two qualifying species of the SPA associated with Breckland Forest SSSI, woodlark and nightjar, from effects due to recreation, cat predation and the direct effects arising from development.

Evidence from other sites supporting these ground nesting bird species e.g. Thames Basin Heaths, Dorset Heaths, Ashdown Forest, indicates that the density of birds is likely to decrease due to development within this 400m zone. Natural England therefore advises that any medium/large housing developments within this zone require an appropriate assessment as a significant effect cannot be ruled out. This is partly due to the fact that it is unlikely that any mitigation will fully address issues that arise during operation of the site in this location.

Natural England therefore advises that further information is required in order to provide sufficient information to inform an appropriate assessment in relation to Breckland SPA.

NORFOLK COUNTY COUNCIL HIGHWAYS

Re-development of this site has previously been considered under 3PL/2018/0580, at which time we recommended the application be refused on the basis of inadequate pedestrian provision. The Highway Authority acknowledges the existing use of the site and accepts this will generate some degree of vehicle and pedestrian movements. However, in redeveloping the site for residential purposes the pattern of

movements will change and is likely to introduce increased pedestrian activity and a demand to access key local services. In order to encourage sustainable access to local services it is necessary that developments of the size and nature proposed demonstrate available walking routes.

Whilst many services may be available within Brandon the catchment primary school is within Weeting. Pedestrian access between the site and Weeting Primary School is reliant on crossing A1065 Mundford Road in the vicinity of its junction with Brandon Road. There is no footway on the western side of the Mundford Road (into Brandon Road) and alternative crossing opportunities are limited to crossing south of the junction; which is off the desire line and adjacent the existing level crossing.

It is the view of the Highway Authority that inadequate pedestrian facilities exist to safely accommodate the key walking route from the site to/from the catchment primary school. It is likely pedestrians would be reliant on crossing Mundford Road either:

- a) north of the junction onto an area of verge from where they would walk round into Brandon Road and cross onto the footway on the west side of the carriageway or
- b) at a point where they have to walk over an excessive width of carriageway into the junction with Brandon Road.

Both of the movements above would be detrimental to highway safety. Therefore, the Highways Authority object to the application as the proposed development does not adequately provide off-site facilities for pedestrians / people with disabilities (those confined to a wheelchair or others with mobility difficulties) to link with existing provision and / or local services.

FLOOD & WATER MANAGEMENT TEAM

This application and falls below our current threshold for providing detailed comment.

HOUSING ENABLING OFFICER

The site area and number of dwellings proposed trigger the thresholds of the Council s affordable housing policy as per DC4 of the Council s Adopted Core Strategy and Development Control Policies Development Plan Document. At present a 25% provision is required on sites capable of accommodating 10 or more dwellings and/or 0.5ha. This is then further split into 70% being made available for rent and 30% for shared ownership, shared equity or any other intermediate product that meets the intermediate definition within NPPF, meets an identified need in the District and is agreed by the Council. In this instance 3.25 units would be required, 2no for rent and 1no for intermediate housing. A commuted sum of 12,500 will also be payable, being 25% of the standard 50,000, to discharge the fractional 0.25 unit requirement. The affordable housing mix i.e., unit types, layout etc. will need to be addressed in any subsequent reserved matters.

ECOLOGICAL AND BIODIVERSITY CONSULTANT

No ecological information has been submitted in support of this application. There appears to be a pond in close proximity to the site and suitable habitat on the site in the form of spoil/ materials that could be used by protected species. There are hedgerows and trees bordering the site. There appears to be several buildings on the site. The applicant has not provided any information on the suitability of the buildings for bats. A Preliminary Ecological Appraisal including further information on the suitability for bats of the buildings where development is proposed needs to be carried out by a suitably qualified ecologist prior to the application being determined.

Great crested newts and all species of bat are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017 (as amended) making great crested newts and all species of bat European Protected Species.

The extant government circular on planning and biodiversity (Circular 06/2005) makes it explicit that the presence or absence of protected species, and the extent to which they could be affected by a proposed development, should be established before planning permission is granted, since otherwise all material considerations might not have been considered in making the decision.

CONTAMINATED LAND OFFICER

There is insufficient evidence for me to ensure the development will not cause significant environmental concern. In light of these concerns, I recommend refusal of this application until such a time as I receive the following information - Desk study and site investigation.

ENVIRONMENTAL HEALTH OFFICERS

I consider there is insufficient evidence for me to ensure that the future occupants of the proposed development will not suffer significant environmental concern. There is no detail as to how the proposed development will be protected from the existing adjacent commercial uses and without this information I am unsure as to whether the future residents can be protected by mitigation or planning conditions.

AIR QUALITY OFFICER

I have concerns that this proposed site may be impacted from dust / air pollution from neighbouring processing sites and I consider that there is insufficient evidence for me to ensure the development will not be caused significant environmental issues.

ENVIRONMENT AGENCY

We object to the proposed development as submitted because there is insufficient information to demonstrate that the risk of pollution to controlled waters is acceptable:

1. We consider the level of risk posed by this proposal to be unacceptable.
2. The application fails to provide assurance that the risks of pollution are understood

WEETING PARISH COUNCIL

The site is not suitable for this size of development. Also, it's in an industrial area with pollutants.

HISTORIC BUILDINGS CONSULTANT

No objection from an historic built environment perspective.

TREE AND COUNTRYSIDE CONSULTANT

The only trees are located on the northern and southern boundaries. It is unlikely that there would be any objection on arboricultural grounds. In order to assess any potential implications on the site it will be necessary to provide a tree survey.

ECONOMIC DEVELOPMENT

No Comments Received

BUCKENHAM AVIATION CENTRE LTD

No Comments Received

WEETING P C

No Comments Received

REPRESENTATIONS

Following the consultation, letters of representation have been received:

One letter objecting to the proposal for the following reason(s):

- This site is located next door to two B2 grade industrial sites which unfortunately seem to have been omitted from some of the plans which only show B8 grade (storage and distribution) sites.
- The description of the site on the pre-determination questionnaire is very misleading by saying that the site is bordered by a train station, the train station is approx 80 metres away but between that and the proposed site is a railway siding used for the loading and unloading of aggregates. On the opposite side it has an immediate boundary with the site belonging to us at Suffolk Woodchips Ltd, which produce fuels for the renewable energy industry from materials sourced from the surrounding Thetford Forest. Both businesses create noise, from large wood chipping machinery and wood chip screening and drying operations and from the aggregate business in the form of cranes loading and unloading stone aggregate from trains and into lorries, both operations of which would be undesirable for anyone living in a property based next door. Due to the nature of the product being handled, the aggregate handling business also creates dust in dry conditions which can regularly be seen blowing across the proposed development site and of which we know there have been numerous complaints. This would be seriously detrimental to any housing development located close by.
- The business has been in operation on this site for 40 years and would very quickly receive complaints of noise from the occupiers of these properties if they were to be built. The site continues to be used as a fencing manufacturing site which enjoys a good working relationship with the existing.
- Residential properties in the middle of an area of mainly industrial businesses would not be sensible and would lead to long term disputes and disagreements with potential new neighbours if they were to be built.

Four representations of support for the following reason(s):

- Great idea, will resolve issues with the existing business including contamination, dust and poor air quality. A blind eye has been turned to this serious problem that residents are enduring. This site of Holbrooks needs moving.
- Fengate housing was allowed even though it was heavily contaminated. Far worse problems can be overcome. Fengate Drove looks good.
- A much needed boost for this area. Ideal area for those using the station. Will compliment the plans for the regeneration of the station.
- Fantastic to get some more local children within a safe distance of this part of the village.
- Living at Redbricks we are the slightly forgotten dwellings, not only by Brandon but also by Weeting. Having a boost of housing will also help to boost moral within this area.
- The residents of Redbricks do not complain about Woodchips.
- The one thing the area lacks is more dwellings

ASSESSMENT NOTES

1.0 Principle of development

1.1 For decision making purposes, as required by the NPPF and Section 38(6) of the Planning & Compulsory Purchase Act 2004, the Development Plan comprises the Adopted Core Strategy and Development Control Policies Development Plan Document, together with the Site-Specific Allocations DPD. Material considerations in respect of national planning policy are the NPPF and the recently published National Planning Policy Guidance.

1.2 The site is located outside the Settlement Boundary of Brandon in an area of open countryside (as defined by policies SS1, DC2, CP1 and CP14 of the Core Strategy and Development Control Policies Development Plan Document 2009), where development is heavily restricted. The application is clearly

contrary to these policies. Furthermore, the site is not being put forward for 100% affordable housing under the rural exceptions policy DC5. The proposal should therefore be refused unless there are material considerations that dictate otherwise. The lack of a 5-year housing supply carries weight in this regard.

1.3 Paragraphs 47 and 49 of the National Planning Policy Framework (NPPF) state that where an authority does not have an up to date five year housing land supply (at present the District figure is 3.3 years), the relevant local policies for the supply of housing as referred to above should not be considered up-to-date and that housing applications should be considered in the context of the presumption in favour of sustainable development.

1.4 The Government defines sustainable development as having three dimensions. These dimensions give rise to the need for the planning system to perform a number of roles:

- economic, in terms of building a strong economy and in particular by ensuring that sufficient land of the right type is available in the right places;
- social, by supporting, strong vibrant and healthy communities by providing the supply of housing required to meet future need in a high-quality environment with accessible local services, and;
- environmental, through the protection and enhancement of the natural, built and historic environment.

1.5 Paragraph 8 of the NPPF stresses that these roles should not be undertaken in isolation because they are mutually dependent, therefore a balanced assessment against these three dimensions is required.

1.6 In environmental terms, the site is located outside of the Brandon settlement boundary however does adjoin the station to the south and the designated settlement boundary of Brandon lies close by to the south, although outside of the District of Breckland. Due to the proximity of the site to the station and services and facilities within Brandon, then the site is considered to be a sustainable location, despite the concerns raised by the Highways Authority (these are further addressed below).

1.7 In terms of the economic criteria, the proposal would provide an additional 13 dwellings in a sustainable location which would be well served by services and facilities (subject to the Highways Authority comments). Despite this concerns are raised with regards to the environmental and social criteria, which are also further discussed below.

2.0 Loss of employment site

2.1 The application site lies in a designated 'general employment area'. Policy DC6 of the Breckland Core Strategy aims to protect these areas for employment use. Therefore, if permitted this proposal would fail to preserve this site for employment contrary to the aims of Policy DC6.

2.2 Policy 6 of the NPPF supports economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 182 of the NPPF states 'planning decisions should ensure that new development can be integrated effectively with existing businesses . . . Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established'. The neighbouring business site has raised concerns about pressures on their business if further residential development was allowed here, mainly due to the noise and disturbance their business would cause to residential properties. In addition, the site is currently in use as a business. The applicants have not submitted any information to demonstrate that this site is not viable as a business or for an alternative use. For these reasons the proposal is considered unacceptable and contrary to policies 6 and 15 of the NPPF and DC6 of the Breckland Core Strategy.

3.0 Access

3.1 Policy CP4 of the Breckland Core Strategy requires new development to ensure safe access. The proposal utilises an existing access off Mundford Road. The access is a wide access and used to serve the existing yard/employment use. The Highways Authority have been consulted and raise no objections in this regard, therefore the proposed access is considered acceptable.

3.2 Policy DC19 of the Breckland Core Strategy ensures appropriate on site car parking provision. Although, this is an outline planning application with all matters other than access to be agreed at this stage, the applicant has submitted an indicative site layout showing 13 dwellings with car parking to the sides of the plots. Although parking appears 'tight' the site could be designed in such a way to provide sufficient car parking. In addition, the site is located adjacent to the station in Brandon and within reasonable distance to other services and facilities within Brandon. That said the Highways Authority have raised an objection to the proposals with regards to the following:

'Whilst many services may be available within Brandon the catchment primary school is within Weeting. Pedestrian access between the site and Weeting Primary School is reliant on crossing A1065 Mundford Road in the vicinity of its junction with Brandon Road. There is no footway on the western side of the Mundford Road (into Brandon Road) and alternative crossing opportunities are limited to crossing south of the junction; which is off the desire line and adjacent the existing level crossing.

It is the view of the Highway Authority that inadequate pedestrian facilities exist to safely accommodate the key walking route from the site to/from the catchment primary school. It is likely pedestrians would be reliant on crossing Mundford Road either:

- a) north of the junction onto an area of verge from where they would walk round into Brandon Road and cross onto the footway on the west side of the carriageway or*
- b) at a point where they have to walk over an excessive width of carriageway into the junction with Brandon Road.*

Both of the movements above would be detrimental to highway safety'.

3.3 Whilst the concerns of the Highways Authority are acknowledged, parents would have the choice of schools and likely to head to Brandon for a variety of other services and facilities, as well as being able to use the train to get to Norwich or Thetford. Therefore, whilst it is agreed that walking to Weeting would not be safe or likely, this is not considered so significant to warrant refusal of Planning Permission, given the available services and facilities in Brandon. In addition, whilst car parking on site might be tight, given the sites location, it is considered that sufficient car parking can be provided.

4.0 Layout and Design

4.1 Policy 12 of the NPPF and DC16 of the Core Strategy seek to achieve a high quality design. Policy 11 of the NPPF seeks to make effective use of land.

4.2 Whilst the proposal is submitted in outline form with matters of layout and design to be considered later, the applicant has submitted an indicative layout showing 13 properties. The indicative layout shows pairs of semi detached properties and one detached dwelling. The character of the area largely comprises of blocks of residential/terrace properties. The site layout could be amended to accommodate this type of development, which would be considered in character with the surrounding area. Any subsequent reserved matters, if this application were to be approved, should address this point. The proposal is considered of an appropriate density for its location, subject to the latter being addressed.

4.3 The NPPF also supports the use of brownfield land for appropriate development. Although, this it is acknowledged that this is brownfield land, it is not considered appropriate for development. Therefore, the proposal is not considered acceptable in this regard and the brownfield element of the proposals does not significantly alter the recommendation.

5.0 Amenity

5.1 Policy DC1 of the Core Strategy seeks all new development to protect the amenity of the area, neighbouring and future occupants. Paragraph 180 of the NPPF states that 'new development should be appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area. . . . including mitigating and reducing potential adverse impacts from noise - and avoid noise giving rise to significant adverse impacts on health and the quality of life'.

5.2 Brandon Station lies to the south of the site with car parking to the front of the site. There are significant vehicles movements associated with this site. To the north is existing commercial development. At the site visit the existing practices were very noisy and the site lies within an area protected for employment including B1, B2 and B8, which can include noise and disturbance generating uses.

5.3 Objections have been received from our environmental health service and that of the existing employment site to the north. In addition, no information in terms of noise surveys etc have been submitted to demonstrate that the amenity of future occupants would be protected from noise and disturbance.

5.4 Although a reserved matter, and only an indicative site layout has been provided, due to the linear nature of the application site, the final site layout is unlikely to be much different from that shown (although the pattern of development could show terrace properties more in character with the area). The proposals would result in very small rear gardens. Gardens of this size would not normally be permissible, however, this is very much the character of this area - looking at surrounding blocks of terrace. It would however, mean that the majority of development is even closer to noise generating uses and therefore is further unacceptable for these reasons also.

5.5 Environmental health officers have also raised concerns with regards to air quality and the lack of a submitted assessment to determine the impact of emissions from road traffic, rail and the existing commercial uses within the immediate vicinity of the proposed development. The proposal is therefore considered contrary to Policies CP9 and DC1 of the Core Strategy and 15 of the NPPF.

5.6 The neighbours concerns about the noise and disturbance of the existing business and support for this proposal are noted. However, as there are other means of protecting neighbouring properties amenity via the Environmental Health powers. Given this is an established employment area then this is not considered to be an overriding reason to grant planning permission in this location.

5.6 As set out above, the proposals are considered contrary to Policy DC1 of the Breckland Core Strategy and 15 of the NPPF, as the surrounding development is likely to negatively impact the amenity of future occupants by noise, disturbance and air quality.

6.0 Heritage assets

6.1 Policy 16 of the NPPF and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, seek to protect the character and appearance of Conservation Areas. The site lies in reasonable

proximity to the Brandon Conservation Area. Although of a sufficient distance so as not to impact its character and appearance. The Historic Buildings officer has assessed the proposals in this regard and is not concerned about the impact on the character or appearance of the Conservation Area either.

6.2 The Railway Station building would be considered as a non-designated heritage asset, but given the plans for its demolition; the distance between to the site and the building; and that the new development could be designed in such a way to compliment the building, then the proposals are not likely to significantly impact this non designated heritage asset to warrant refusal of planning permission in this regard.

7.0 Ecology

7.1 Policy 15 of the NPPF seeks for new development to preserve and enhance biodiversity. No ecology information has been submitted with the application and the Council's ecologist and Natural England have objected in this regard. The proposal is therefore considered contrary to Policy 15 of the NPPF, as it fails to demonstrate that ecology will not be affected and how it will be enhanced.

8.0 Flood Risk and Drainage

8.1 Policy 14 of the NPPF requires seeks to direct new development away from areas at highest risk of flooding and for new development to not increase flood risk elsewhere. The site includes an area to the centre of the site with localised surface water drainage issues. No information has been submitted with the application to demonstrate the proposal would not result in increased flood risk elsewhere and no sequential test has been provided to demonstrate development could not be located elsewhere, contrary to Policy 14 of the NPPF, specifically paragraphs 155 to 158.

9.0 Trees

9.1 The retention of trees and hedgerows is supported by Policy DC12 of the Core Strategy. There is some vegetation to the boundaries of the site. The tree officer has reviewed the site and although it does appear possible that development could proceed without damaging significant trees, no evidence has been submitted in support of the application to demonstrate this. Therefore, the proposal is considered contrary to Policy DC12 of the Breckland Core Strategy.

10.0 Contamination

10.1 Policy 15 of the NPPF states that planning decisions should take account of ground conditions and contamination risk. Insufficient evidence has been provided to demonstrate that the applicant has taken proper account of grounds conditions and any risks arising from contamination. The Contaminated land officer has objected in this regard and the proposal is considered contrary to Policy 15 of the NPPF.

11.0 Conclusion

11.1 The proposal is located outside any designated development boundary, contrary to policies SS1, DC2, CP1 and CP14 of the Core Strategy and Development Control Policies Development Plan Document 2009. However, the Councils current position with regards to a lack of a five year housing land supply, requires the Council to apply the 'titled balance', as required by paragraph 11 of the NPPF. Paragraph 11 requires development to be granted, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

11.2 Despite the sites reasonable sustainable location, close to services and facilities and taking into

consideration the comments of the Highways Authority, the proposal would result in unacceptable amenity impacts for future occupants contrary to the social aspect of sustainable development.

11.3 The applicant has also failed to suitably demonstrate that the proposal would not give rise to unacceptable flood risk elsewhere contrary to Policy 14 of the NPPF; that proper account has been taken of ground conditions and risks from contamination; and that the development would preserve and enhance ecology both in accordance with Policy 15 of the NPPF. This is contrary to the environmental aspect of sustainable development.

11.4 Furthermore, the proposal fails to preserve this site for employment, contrary to Policy DC6 of the Breckland Core Strategy or demonstrate the site is not required for this purpose and that the proposal for residential, not taking into account local business needs, contrary to Policy 6 of the NPPF and the economic dimension.

11.5 The benefits of providing 13 dwellings, taking into account the councils lack of the five year housing land supply, would significantly and demonstrably be outweighed by the detrimental social, economic and environmental harm from residential development in this location. The proposal is therefore contrary to the Development Plan and relevant NPPF policies and is therefore recommended for refusal.

RECOMMENDATION

The proposal is recommended for refusal for the following reasons:

REASON(S) FOR REFUSAL

- 1 Amenity**

The location of development close to existing noise generating uses such as employment and the Station/car park would result in unacceptable levels of noise and disturbance for future occupants contrary to the requirements of Policy DC1 of the Breckland Core Strategy and Policy 15 of the NPPF. Furthermore, the applicants have failed to submit any supporting evidence to demonstrate that unacceptable amenity levels would not arise.
- 2 Flood Risk**

Insufficient information has been submitted as part of the application in respect of flooding and it is therefore not possible to assess the likely impacts of the proposed development, when having regard to potential flood risk elsewhere or whether the proposal has considered or included appropriate and acceptable mitigation measures. The proposal does not, therefore, accord with Policy DC13 of the adopted Breckland Core Strategy and Development Control Policies Development Plan Document (2009) and Policy 14 of the National Planning Policy Framework (2019).
- 3 Contamination**

Insufficient information has been submitted as part of the application in respect of ground conditions and risks from contamination and therefore not possible to assess the likely impacts on ground conditions, health and the natural environment. The proposal does not, therefore, accord with Policy CP9 and DC1 of the adopted Breckland Core Strategy and Development Control Policies Development Plan Document (2009) and Policy 15 of the National Planning Policy Framework (2019).
- 4 Ecology**

Insufficient information has been submitted as part of the application in respect of ecology and it is not possible to assess the likely impacts of the proposed development on biodiversity or determine whether the proposal has considered or included appropriate and acceptable mitigation measures. The proposal does not, therefore, accord with Policy CP10 of the adopted Breckland Core Strategy and Development Control Policies Development Plan Document (2009) and Policy 15 of the National Planning Policy Framework (2019).

5 Loss of Employment

This proposal fails to protect this site for employment, which is part of an allocated general employment area, contrary to Policy DC6 of the Breckland Core Strategy or provide any sufficient justification for its loss. The proposal also puts the neighbouring commercial development at risk, failing to support economic growth and not taking account of the wider impacts of residential development on the surrounding area contrary to Policies 6 and 15 of the NPPF.

6 Air Quality

Insufficient information has been submitted as part of the application in respect of air quality and the applicant has failed to demonstrate that the proposal would not suffer from emissions from road traffic, rail and the existing commercial uses within the immediate vicinity of the proposed development. The proposal does not, therefore, accord with Policy CP9 and DC1 of the adopted Breckland Core Strategy and Development Control Policies Development Plan Document (2009) and Policy 15 of the National Planning Policy Framework (2019).

7 Non-std reason for refusal

Insufficient information has been submitted as part of the application in respect of trees and hedges, having regard to Policy DC12 of the adopted Breckland Core Strategy and Development Control Policies Development Plan Document (2009) and its requirement to avoid their loss.