

**Barracks Meadow, Hawkes Lane, Bracon Ash – Site reference: GNLP0549**

Dear Mrs Baker,

I am writing after our discussion a few weeks ago where I expressed our concerns on behalf of the Bracon Ash Residents Group about the suitability assessment for Barracks Meadow (site reference GNLP0549). Thank you for taking the time to speak with me.

As you know, it is our contention that the suitability assessment is misleading. The way the assessment is structured attempts to create an inaccurate impression that the site is suitable for development.

Although we understand a more detailed assessment will be carried out in due course, we request the traffic light analysis is corrected before any next steps in the planning process.

Bracon Ash Residents Group (BARG) is a group of villagers which was formed in 2016 to oppose the development of 52 houses (SNDC planning ref: 2016/0713) in Bracon Ash. This application, which was directly adjacent to Barracks Meadows, was refused. However, there is no reference to that decision of refusal in the assessment of Barracks Meadow. It is surely important and relevant to note within the assessment conclusions that the impact on heritage assets was specifically one of the reasons for refusal of the previous, adjacent, planning application ref 2016/0713. As a result of the decision made by the South Norfolk Development Management Committee, Barracks Meadow (marked with a blue cross in the photo below) should, in fact, be classified as red – not amber - under the Historic Environment analysis.

Having taken professional advice from a leading Conservation Architect and Historic Built Environment Consultant it should be noted that development of this proposed site has the potential to cause harm to the setting of several listed buildings and to the character of Bracon Ash.



Site constraints to be taken into account are:

Home Farm House (circled yellow) - Grade 11 listed and immediately adjacent to the western boundary of Barracks Meadow. Mergate Farm (circled green) - Grade 11 listed (one of only two thatched buildings left within Bracon Ash) and adjacent to the south east of Barracks Meadow on Hawkes Lane. A further three listed buildings (circled red) to the south on Mergate Lane' which are separated from the site by Bracon Common a County Wildlife Site, Mergate Hall, Grade 11\* listed (\*which denotes its high status), The Dower House and Mergate Hall Cottages are both Grade 11 listed buildings.

The above listed buildings have an historic relationship within an agricultural community all being in the ownership of the manorial estate of Mergate Hall until 1946. This site is part of that historic relationship and within the setting of two of those buildings.

All development proposals must have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place. Development of this site will cause harm to the significance of these heritage assets, whose settings and historical relationships will be adversely affected.

The Form and Character description for Bracon Ash, included within the South Norfolk Local Plan, makes reference to Barracks Meadow:

***'Within the village, there is an important gap to the north of Mergate Farm, which maintains the segregation between the farm and the village '***

Given the importance of this existing open, greenfield space, development of the site will join the existing built-up core of the village to the older, significant historic buildings which sit in more open spaces and will have a negative impact on the character of Bracon Ash.

Any development on Barracks Meadow will not be sustainable. Barracks Meadow is not located within walking distance of local services in Mulbarton. With this in mind, the proposed scheme does not promote Government or local authority aims for sustainable travel.

The suitability assessment for GNLP0549 is also inaccurate in the section relating to Accessibility to Services. This is currently identified as amber within the constraints analysis and states in the conclusion that the 'GP surgery, schools and employment opportunities are within 2km. This is incorrect. The distance is actually >2.25km, therefore the assessment should be red not amber.

The conclusion within the suitability assessment also fails to address the accepted and significant highway safety issues along the B1113 from Bracon Ash to Mulbarton. The narrowness of the footpath facilities are substandard, not continuous and do not comply with 'inclusive mobility' standards.



*Photograph: Narrow footpath along the B1113 (65cm) and with no kerb*

The B1113 is a busy main distributor road/designated HGV route and measures just 5.6 metres wide in some places (also substandard). In conjunction with a narrow footpath of just 1.2 metres wide this footpath is hazardous for people who will walk it.

As was previously demonstrated, the speed of vehicles on the B1113 is often well in excess of the 30mph limit. Vehicle speed measurements which were conducted found the 85<sup>th</sup> percentile speeds to be 39.4mph travelling northbound and 42.2mph travelling southbound along this stretch of road.

An extract of an email exchange between John Shaw (NCC Highways) and Tim Barker (SNDC) regarding planning application ref 2016/0713 highlighting pedestrian intimidation and the substandard footpath is attached at the end of this report.

The limitations of Hawkes Lane were mentioned in the suitability assessment but we want to draw your attention to the recent refusal to build a further eight houses on the Nurseries site, off Hawkes Lane – SNDC planning ref: 2017/2807.

NCC Highways recommended refusal due to the following reasons:



***SHCR 02 - The proposed development does not adequately provide off-site facilities for pedestrians / cyclists / people with disabilities (those confined to a wheelchair or others with mobility difficulties) to link with existing provision and / or local services.***

***SHCR 07 - The unclassified road serving the site is considered to be inadequate to serve the development proposed, by reason of its poor alignment / restricted width / lack of passing provision / substandard construction. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety.***

Not only does Hawkes Lane incorporate a blind 90-degree corner but towards the south of the village, and a few metres away from Barracks Meadow, very large agricultural vehicles also continually use Hawkes Lane and Mergate Lane resulting in collapsed/eroding banks and large potholes. The site is not a safe location for new homes.



*Photograph: Collapsed bank along Mergate Lane - metres away from Barracks Meadow.*



A further example of the inaccuracy of the suitability assessment for GNL0549 is under the Flood Risk section. Barracks Meadow is frequently waterlogged with localised flooding. See the picture below. Throughout the year flooding is also evident along Hawkes Lane and the adjoining Marsh Lane and Mergate Lane. There are examples of Bracon Ash flooding at the end of this report.



*Photograph: Flooding on Barracks Meadow*

Significant negative impacts would arise from a development that is inappropriately placed and is widely out of context with a rural environment. We therefore contend that, as a result of evidence from experts we have commissioned over the past two years in relation to the previous application (planning ref: 2016/0713), that the harm to the environment would be significant and would outweigh any benefits of future development on Barracks Meadow.

Please can you confirm the contents of the suitability assessment will be reviewed and corrected.

We hope this brief report will be of assistance to you. If we can be of any further assistance in providing anything please don't hesitate to contact us.

Kind Regards

Luke Stone

On behalf of the Bracon Ash Residents' Group

cc Mike Burrell

# Surface water flooding – Bracon Ash



Graphic 4: The Environment Agency: Surface water flood mapping.



Extract of an email exchange between John Shaw (NCC Highways) and Tim Barker (SNDC).

The measurements and widths quoted below by John Shaw are still present in the off-site improvements.

**From:** Shaw, John R  
**Sent:** Tue, 14 Feb 2017 09:33:40 +0000  
**To:** Tim Barker; Planning Idox  
**Subject:** FW: 2016/0713 Bracon Ash

With regards to the substandard nature of the footway, "Inclusive Mobility" (Department for Transport publication 2002) seeks a clear width of 2m to allow two wheelchairs to pass one another. This is regarded as the minimum appropriate width under normal circumstances. Where it is not possible, "Inclusive Mobility" continues to state that 1.5m could be regarded as the minimum acceptable for the disabled under most circumstances as it would allow a pedestrian to pass a wheelchair user. A further reduction is allowable to 1m provided the narrowing is no more than 6m long. Inclusive Mobility remains current Gov't department guidance.

Whilst the above caters primarily for disabled people, its recommendations are recognised nationally as forming the cornerstone of safe and satisfactory highway design. Further Gov't guidance published under "Manual for Streets" in 2007, takes the matter further by saying that in lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2m. Additional width should be considered between the footway and a heavily used carriageway. There can be no doubt that the B1113 passing through Bracon Ash is anything other than a heavily used carriageway, hence its very specific designation within the Norfolk route hierarchy as a "Main Distributor"

As matters stand, even with the proposed highway improvements it is simply not possible for two pushchairs to pass one another without potentially having to step onto the carriageway on what is being promoted as the available and safe route to school by parents and carers with young children.

The proposed new footway from the site past the village hall at just 1.5m wide is not (as claimed) being provided to standard but rather would need to be widened to 2m.

With regards to the claim that two pushchair users can see each other approaching and wait before the pinch points simply won't work. There would need to be a minimum width of 1.8m to allow two pushchairs to pass and reference to the applicants plans clearly demonstrates that is simply not feasible along nearly the entire length of the route between the site boundary and the roundabout. This concern is heightened with the increased scale of development, which would be likely to lead to significantly more pedestrians than that envisaged with the scale of growth allocated under the LDF

The effective width of a footway also needs to be unobstructed by any vertical feature, uneven surface or the use envelope such as by a hedge. Where hedges bound a side of a footway, the use envelope needs to be increased by 300mm to account for the possibility that the hedges will overgrow the route at certain times of the year. This factor has not been taken into account.