

Planning (Regulatory) Committee

Date: **Friday 5 March 2021**

Time: **11am**

Venue: **Online - Teams Live Virtual Meeting.**

To view the meeting please follow this link: <https://youtu.be/HgHhyqmK84A>

Members of the Committee and other attendees: **DO NOT** follow this link, you will be sent a separate link to join the meeting.

Persons attending the meeting are requested to turn off mobile phones

Membership

Cllr Colin Foulger (Chair)

Cllr Brian Long (Vice-Chair)

Cllr R Brame

Cllr Mike Sands

Cllr M Castle

Cllr Eric Seward

Cllr David Collis

Cllr Bev Spratt

Cllr Danny Douglas

Cllr Martin Storey

Cllr Brian Iles

Cllr Tony White

Cllr William Richmond

At meetings of this Committee, members of the public are entitled to speak before decisions are made on planning applications. There is a set order in which the public or local members can speak on items at this Committee, as follows:

- Those objecting to the application
- District/Parish/Town Council representatives
- Those supporting the application (the applicant or their agent.)
- The Local Member for the area.

Anyone wishing to speak regarding one of the items going to the Committee must give written notice to the Committee Officer (committees@norfolk.gov.uk) at least 48 hours before the start of the meeting. The Committee Officer will ask which item you would like to speak about and in what respect you will be speaking. Further information can be found in [Appendix 28 of the Constitution](#).

**For further details and general enquiries about this Agenda
please contact the Committee Officer:**

Hollie Adams on 01603 223029 or email committees@norfolk.gov.uk

Under the Council's protocol on the use of media equipment at meetings held in public, this meeting may be filmed, recorded or photographed. Anyone who wishes to do so must inform the Chairman and ensure that it is done in a manner clearly visible to anyone present. The wishes of any individual not to be recorded or filmed must be appropriately respected.

When the County Council have received letters of objection in respect of any application, these are summarised in the report. If you wish to read them in full, Members can request a copy from committees@norfolk.gov.uk

A g e n d a

1. To receive apologies and details of any substitute members attending

2. Minutes

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To confirm the minutes from the Planning (Regulatory) Committee meetings held on 16 October 2020

3. Declarations of Interest

If you have a **Disclosable Pecuniary Interest** in a matter to be considered at the meeting and that interest is on your Register of Interests you must not speak or vote on the matter.

If you have a **Disclosable Pecuniary Interest** in a matter to be considered at the meeting and that interest is not on your Register of Interests you must declare that interest at the meeting and not speak or vote on the matter

In either case you may remain in the room where the meeting is taking place. If you consider that it would be inappropriate in the circumstances to remain in the room, you may leave the room while the matter is dealt with.

If you do not have a Disclosable Pecuniary Interest you may nevertheless have an **Other Interest** in a matter to be discussed if it affects, to a greater extent than others in your division

- Your wellbeing or financial position, or
- that of your family or close friends
- Any body -
 - Exercising functions of a public nature.
 - Directed to charitable purposes; or
 - One of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union);

Of which you are in a position of general control or management.
If that is the case then you must declare such an interest but can speak and vote on the matter.

4. Any items of business the Chairman decides should be considered as a matter of urgency

5. FUL/2020/0094 Norfolk County Council, Martineau Lane, Norwich, NR1 2DH

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Report by the Executive Director of Community and Environmental Services

Tom McCabe
Head of Paid Service
County Hall
Martineau Lane
Norwich
NR1 2DH

Date Agenda Published: 25 February 2021



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STANDING DUTIES

In assessing the merits of the proposals and reaching the recommendation made for each application, due regard has been given to the following duties and in determining the applications the members of the committee will also have due regard to these duties.

Equality Act 2010

It is unlawful to discriminate against, harass or victimise a person when providing a service or when exercising a public function. Prohibited conduct includes direct discrimination, indirect discrimination, harassment and victimisation and discrimination arising from a disability (treating a person unfavourably as a result of their disability, not because of the disability itself).

Direct discrimination occurs where the reason for a person being treated less favourably than another is because of a protected characteristic.

The act notes the protected characteristics of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The introduction of the general equality duties under this Act in April 2011 requires that the Council must in the exercise of its functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by this Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.
- Foster good relations between people who share a relevant protected characteristic and those who do not.

The relevant protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Crime and Disorder Act, 1998 (S17)

Without prejudice to any other obligation imposed on it, it shall be the duty of the County Council to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.

Human Rights Act 1998

The requirements of the Human Rights Act 1998 must be considered.

The human rights of the adjoining residents under Article 8, the right to respect for private and family life, and Article 1 of the First Protocol, the right of enjoyment of property are engaged. A grant of planning permission may infringe those rights but they are qualified rights, that is that they can be balanced against the economic interests of the community as a whole and the human rights of other individuals. In making that balance it may also be taken into account that the amenity of local residents could be adequately safeguarded by conditions albeit with the exception of visual amenity.

The human rights of the owners of the application site may be engaged under the First Protocol Article 1, that is the right to make use of their land. A refusal of planning permission may infringe that right but the right is a qualified right and may be balanced against the need to protect the environment and the amenity of adjoining residents.

**Planning (Regulatory) Committee
Minutes of the Meeting Held on 16 October 2020
at 11am on Microsoft Teams (virtual meeting)**

Present:

Cllr Colin Foulger (Chair)
Cllr Brian Long (Vice Chair)

Cllr Mick Castle
Cllr David Collis
Cllr Eric Seward
Cllr Danny Douglas
Cllr Brian Iles

Cllr William Richmond
Cllr Bev Spratt
Cllr Martin Storey
Cllr Tony White

Also Present

Hollie Adams
Jane Linley
Nick Johnson
Andrew Harriss
Ralph Cox
Belinder Gill
Jonathan Hanner

Committee Officer
Team Lead (Planning & Environment), nplaw
Head of Planning
Senior Planning Officer
Principal Planner
Veolia; agent for the applicant
Principal Engineer (Developer Services)

1 Apologies and Substitutions

- 1.1 Apologies were received from Cllr Roy Brame. Also absent was Cllr Mike Sands.

2 Minutes

- 2.1 The minutes from the Planning (Regulatory) Committee meeting held on 4 September 2020 were agreed as an accurate record.

3 Declarations of Interest

- 3.1 No declarations of interest were made.

4 Urgent Business

- 4.1 There was no urgent business.

Applications referred to the Committee for determination.

5 FUL/2019/0067: Ernest Gage Avenue, Longwater Industrial Estate, Costessey, Norwich, Norfolk, NR5 0TL

- 5.1.1 The Committee received the report for the application for planning permission for construction and operation of a new industrial building (B2) to house the operation of a Waste Transfer Station, a vehicle depot and ancillary development; the proposed waste transfer station would manage non-hazardous municipal, commercial and industrial waste and construction of a new industrial building which would house the operations and relocation of the applicant's existing vehicle depot from elsewhere within the Longwater Estate.
- 5.1.2 The Committee saw a presentation by The Senior Planning Officer ([see appendix A](#)):
- Design of the proposed building was considered complimentary to the wider industrial estate and was on the site of a former scrap metal breakage site.
 - Existing tree screening would be retained.
 - Costessey Town Council Members and local residents had raised concerns about noise and gulls due to waste on the site, however all waste was proposed to be transported in covered vehicles and processed inside buildings; operations on site would require an environmental permit.
 - Costessey Town Council and the Local Member had raised concerns about an increase in traffic movements in the vicinity. The Highways Authority and Highways England had been consulted and raised no objection.
 - The Local Member had raised concern that the development would prevent long term plans for the second exit from William Frost Way to Queens Hill. Officers had reviewed the plans to provide a second, southern access to the Queens Hill area and concluded that the second option could be modified to avoid the application side by moving the proposed roundabout eastwards. This did not form part of the Local Development Plan and therefore only limited weight could be given to future highways developments.
 - Costessey Town Council had suggested that the applicant should make a contribution to upgrading the pedestrian crossing on William Frost Way; the application site was not identified in the Development Plan as a site required to make a contribution to pedestrian crossings.
 - The site was also not identified in the Development Plan as a site which should make contribution for improvement to the A47 interchange.
 - The proposal would contribute to driving waste up the hierarchy.
 - The proposal was in accordance with National Guidance and the Development Plan when taken as a whole and there were no material considerations stating it should be refused; agreement was therefore recommended.
- 5.2 The Committee asked questions about the presentation:
- Further clarification on B2 use was requested; the Senior Planning Officer confirmed that proposals for general B2 use was usually determined by the District Council but was a County Council matter in this case as waste management was involved in the application. It was recommended that the

operator discuss future uses on the proposed site with the District Council.

- The predicted rise in traffic in the vicinity was queried. The Senior Planning Officer clarified there was an existing site run by the operator in a different area of the Longwater Estate which was proposed to move to the site. There would be an increase in traffic movements however when it was a scrap yard there would also have been a number of traffic movements associated with the site.
- Local bus operators had not been consulted, but the highway authority and Highways England had not raised objections to the application. The Principal Engineer (Developer Services) clarified that the applicant had put forward a transport assessment which showed a marginal increase in overall traffic movements, as although there would be an increase in HGV movements there would be a decrease in car movements when compared to previous use on the site. However, the increase in peak time traffic would be minimal as operations of the site took place over a 24h period with some traffic movement from the site taking place outside of the typical peak hours.
- The building was not proposed to have negative pressure on the basis that this was commonly used to control odour at waste management facilities such as composting or anaerobic digestion plants where this could be an issue, and the Environment Agency had not suggested a need for this.
- It was clarified that, according to the applicants TA, the proposed development would have an estimated 74 two-way car/van movements per day compared to 114 under the previous use and 218 two-way HGV movements compared to 94 under the previous use. This would be an overall increase of 84 vehicle movements per day equating to a 0.26% net traffic increase on Dereham road and a 0.18% traffic increase on the A47. This would also equate to an approximate increase in HGVs of 9.7% on Dereham Road and 4.7% on the A47.
- Planning Officers did not know full details of the operation of the scrap yard which previously operated on the site, but thought it was unlikely that it operated 24h a day. The site operated as an open-air facility, whereas the application proposed handling to be indoors in a building with doors facing north, facing away from nearby residential areas. The route of HGVs would most likely be along the A47, away from local residential areas.

5.3 The Committee heard from Belinder Gill of Veolia, speaking on behalf of the applicant:

- Veolia was the number one waste provider in the UK, providing services to 130 local authorities and a large number of commercial providers, and employing 14,000 people.
- Ms Gill noted that no objections had been received from statutory consultees
- On objections raised related to vehicle movements and the impact on the local road network, Ms Gill noted that Veolia had an existing depot 50m away from the application site which was used for parking of 20 vehicles which left during the night and returned later to park. This activity would be relocated to the application site.
- Veolia had submitted a transport assessment with the application which concluded that there would be a limited increase in traffic movements which would have a limited impact on the surrounding highways.
- Ms Gill suggested that if another operator were to use the site under its current usage as a scrap yard, traffic movements would be uncontrolled due to the

current conditions of the site.

- The small increase in vehicle movements did not warrant a contribution towards making improvements to the crossing on William Cross Way and it would not be legal to ask for this
- Ms Gill also commented on local residents' concerns on local amenity; the nearest residential properties were 150m away from the site and the proposal would be an improvement on the operations which previously occurred on site. It would allow for segregation of waste and management of waste higher up the hierarchy, with the remaining waste being transported away from the site, which would support towards meeting targets for waste recycling and carbon emissions.

5.4 The Committee moved on to debate:

- Cllr Danny Douglas raised concerns as there was a large residential site around the proposed site and no dampening proposed, noting the impact of lorries exiting and entering the site early in the morning. He also felt that the application would exacerbate traffic in the area and affect local bus services which was not discussed in the transport assessment.
- Cllr Mick Castle, seconded by Cllr Bev Spratt, proposed accepting the recommendations.

5.5.1 Councillors were each asked for their vote on the proposal to approve the application (where a Councillor was not present for the whole debate, or was not able to declare their vote due to technical issues, no vote would be recorded)

5.5.2 With 8 votes for and 3 against, the Committee **RESOLVED** to **APPROVE** that the Executive Director of Community and Environmental Services be authorised to:

- I. Grant planning permission subject to the conditions outlined in section 11.
- II. Discharge conditions where those detailed above require the submission and implementation of a scheme, or further details, either before development commences, or within a specified date of planning permission being granted.
- III. Delegate powers to officers to deal with any non-material amendments to the application that may be submitted.

The meeting ended at 11.52

Chair



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Planning (Regulatory) Committee

Item No: 5

| | |
|---|--|
| Decision making report title: | FUL/2020/0094 Norfolk County Council, Martineau Lane, Norwich, NR1 2DH. |
| Date of meeting: | 5 March 2021 |
| Responsible Cabinet Member: | N/A |
| Responsible Director: | Tom McCabe, Executive Director of Community and Environmental Services |
| Is this a key decision? | No |
| If this is a key decision, date added to the Forward Plan of Key Decisions. | N/A |
| <p>Executive Summary</p> <p>Planning permission is sought to under section 73 of the Town and Country Planning Act 1990 to vary the approved planning permission FUL/2019/0066 at County Hall, Norwich, for the construction of a new car park to the perimeter of the annex building, upgrade including surface water drainage to existing annex car park and the installation of a single car park deck to main car park.</p> <p>The changes being proposed to the approved drawings listed in condition 2 include:</p> <ul style="list-style-type: none"> ▪ The reduction in the overall footprint of the deck system & associated lighting adjustments. ▪ The re-orientation of the access ramp to the decked car park ▪ The proposed lighting columns to the east side of Annex A to be removed and installed on the Annexe building elevation. <p>In addition, the applicant as part of this application, has also applied to develop the site without compliance with the following conditions attached to the extant planning permission:</p> <p>Condition 4 – Additional drawing submitted to demonstrate the surface water management arrangements from the deck system.</p> <p>Condition 8 – Additional drawing and manufacture’s information submitted on the cladding material to be utilised.</p> <p>Condition 10 - Temporary parking arrangements proposals document and plan to demonstrate the mitigation measure for any temporary impacts on the highways during the construction works have been submitted.</p> | |

Condition 11 - Written scheme of investigation for monitoring works under archaeological supervision to safeguard any findings of archaeological interest potentially related to Bracondale Hall have been submitted.

The applicant has been made by the Corporate Property Team, Norfolk County Council. It has generated sixteen third party representations from ten respondents. Nine letters raising concerns, relating primarily to the need for the additional parking being proposed, the number of new spaces being proposed, and the impacts of the proposal on the surrounding highway network and residential amenity. One letter of support.

The impacts of the proposal have been carefully considered by officers and technical consultees and it is advised that the proposed development is in accordance with the development plan and national planning policy. The proposal is therefore considered to be acceptable, subject to conditions and there are no issues of sufficient weight to justify a refusal.

Recommendation:

That the Executive Director of Community and Environmental Services be authorised to:

- I. **Grant planning permission subject to the conditions outlined in section 11.**
- II. **Discharge conditions where those detailed above require the submission and implementation of a scheme, or further details, either before development commences, or within a specified date of planning permission being granted.**
- III. **Delegate powers to officers to deal with any non-material amendments to the application that may be submitted.**

1. Background

- 1.1. Application FUL/2019/0066 which this application seeks to vary, was recommended for approval by the Planning (regulatory) Committee at the committee meeting in August 2020. The application was subsequently approved following consideration by the Secretary of State for Housing, Communities and Local Government whether to call in the application. The application sought an increase in the number of car parking spaces on the County Hall campus by 128 spaces. It also, includes details of the improvement of the condition/standard of the existing car parking area around the annex building.

- 1.2. Other relevant site history includes:

| Application Reference | Description of development | Decision | Date of decision |
|-----------------------|--|-----------|------------------|
| Y/4/2016/4001 | Planning application for permanent car parking area to replace an area previously used for car parking and currently | Permitted | 14/07/2016 |

| | | | |
|---------------|--|-----------|------------|
| | being used as a contractor's compound/storage area. | | |
| Y/4/2018/4002 | Planning application for a permanent car parking area with 218 car parking spaces to replace an area previously used for car parking and a contractor's compound/storage area. The proposed scheme includes a drainage system, lighting scheme, and a barrier and pay station system | Permitted | 14/05/2018 |
| FUL/2019/0028 | <p>Proposed alterations to County Hall. The alterations comprise:</p> <ul style="list-style-type: none"> -Replacement and new windows and doors to improve thermal and acoustic performance. -New external escape stairs/ramps -Regrading of external surfaces to improve level access but without increasing surface area of hard standing. -New mechanical plant equipment for internal environment-controlled system -Reconfiguration of internal office space to provide flexible working space -New evacuation lift and entrance to North Wing (previously Norfolk Constabulary) -New insulated membrane roof to North Wing -Reconfiguration of internal office space to accommodate County Coroner's court. -Provision of new restaurant to cater for staff only. | Permitted | 02/03/2020 |

| | | | |
|--|--|--|--|
| | -Provision of additional dedicated disabled and visitor parking for the Coroner's Court. | | |
|--|--|--|--|

2. Proposals

2.1. SITE

2.2. County Hall campus is the central hub and the most significant premises operated by Norfolk County Council. It holds the highest number of employees and hosts the largest amount of the Norfolk County Council delivered critical activities.

2.3. The County Hall building dates from 1968 and is prominently located at the south eastern edge of Norwich and visible from some distance when approaching the City. The building comprises of the main tower, north and south wings and is locally listed by Norwich City Council. The Annex Building, which is not listed is a more recent addition and is of prefabricated modular construction.

2.4. The campus site has extended grounds which cover an area of approximately 13.3 ha and includes parkland, a car parking area and a belt of trees which have a County Wildlife Site Designation.

2.5. PROPOSAL

2.6. The application seeks to vary the approved details in condition 2 of application FUL/2019/0066, in the following ways:

The changes include:

Annex Car Park Area

- Change of 2no. external lights to the extended area of car park from pole mounted to building mounted. The applicant has requested this amendment due to the high level of existing services present within the adjacent ground which the applicant explains would make *"installation in the proposed area impossible."*

Main Car Park Deck System

- Reduction in area of decked car park system and ramp from 3,331m² to 2,800m² (excluding stairs). This is within the same footprint as the previous proposals. No change in overall car parking provision. Parking layout on ground and 1st floor amended to suit new footprint. The applicant has requested this amendment as a result of the appointed contractor's Design & Build proposal.
- Updating of the lighting details following revised layout of deck system:
 - Reduced number of lighting columns from 12 (including 2 on ramp) to 9.
 - Increase in column heights from 4m above deck to 6m above deck. Lighting plots provided to show light spill contained within site boundary.

- Lighting still on timeclock control for limiting hours of usage.

The applicant has requested this amendment as a result of the appointed contractor's Design & Build proposal.

- Reorientation of the ramp from a NE to SW direction (going up the ramp) to a SW to NE direction to reduce headlight spill to boundary.
The applicant has requested this amendment as a result of the appointed contractor's Design & Build proposal.
- Revised elevation drawings for correction of inconsistent elevation heights shown on original application plus increase in cladding height above deck level from 1.1m to 1.3m. Adjustments as follows, max. ordnance survey elevation of car park deck - top of cladding: Original – 32.95m Revised – 33.29m Difference – +0.36m.

In addition, the applicant has also applied to develop the site without compliance with the following conditions attached to the extant previous planning permission on the basis that the information has now been provided making the need for the conditions redundant:

- Condition 4 – Additional drawing provided to demonstrate the surface water management arrangements from the deck system.
- Condition 8 – Additional drawing and manufacture's information provided on the cladding material to be utilised.
- Condition 10 - Temporary parking arrangements proposals document and plan to demonstrate the mitigation measure for any temporary impacts on the highways during the construction works.
- Condition 11 - Written scheme of investigation for monitoring works under archaeological supervision to safeguard any findings of archaeological interest potentially related to Bracondale Hall.

3. Impact of the Proposal

3.1. DEVELOPMENT PLAN POLICIES

The following policies of the Joint Core Strategy for Broadland Norwich and South Norfolk (adopted 2014) (JCS) and Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan) provide the development plan framework for this planning application. The following policies are of relevance to this application:

Joint Core Strategy for Broadland, Norwich and South Norfolk

Policy 1 Addressing climate change and protecting environmental assets

Policy 2 Promoting good design

Policy 3 Energy and water

Policy 6 Access and transportation

Policy 12 The remainder of the Norwich urban area including the fringe Parishes

Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)

DM1 Achieving and delivering sustainable development
DM2 Ensuring satisfactory living and working conditions
DM3 Delivering high quality design
DM6 Protecting and enhancing the natural environment
DM7 Trees and development
DM9 Heritage
DM11 Environmental hazards
DM16 Supporting the needs of business
DM28 Encouraging sustainable travel
DM30 Access and highway safety
DM31 Car parking and servicing

3.2. OTHER MATERIAL CONSIDERATIONS

The Revised National Planning Policy Framework (NPPF) was published February 2019 and sets out the Government's planning policies for England and how these should be applied. Whilst not part of the development plan, policies within the NPPF are also a further material consideration capable of carrying significant weight. The NPPF highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. It goes on to state that achieving sustainable development means the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: economic, social and environmental. The NPPF places a presumption in favour of sustainable development. However, paragraph 47 states that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

3.3. Paragraph 48 of the NPPF states, in summary, that local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan; the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the NPPF.

3.4. A draft revised National Planning Policy Framework is currently being consulted on; the consultation closes on 27th March 2021. Due to the revised document being in draft format very limited weight can be attributed to it in the assessment.

3.5. Greater Norwich Local Plan (Regulation 19 Pre-Submission Draft Plan)

The Greater Norwich Development Partnership which includes Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan. The public consultation on the draft version of the Greater Norwich Local Plan (GNLP), also called the Regulation 19 Pre-Submission Draft Plan started on Monday 1 February 2021 and runs for 6 weeks, until 5pm on Monday 15 March 2021. There are two parts to the plan,

the first is the Publication draft GNLP Strategy which contains the planning strategy for growth in Greater Norwich from 2018 to 2038 and the second is the Publication draft GNLP Sites document which contains allocation policies for the sites to deliver the strategy. The draft plan is still evolving; therefore, limited weight can be given to it in the consideration of this application.

- 3.6. Furthermore, because this is a planning application for the County Council's own development, whilst not part of a development plan or itself a planning policy, Norfolk County Council's Environmental Policy adopted in November 2019 is also material to the decision.

3.7. CONSULTATIONS

NORWICH CITY COUNCIL (Planning)

No specific comments to make regarding the amendments. Reiterate the objections of Norwich City Council as Local Planning Authority to the principle of the development. These objections were set out within our letters of 28 February 2020 and 28 May 2020 in relation to application reference FUL/2019/0066. (Previous comments available in Appendix 1 of this report).

NORWICH CITY COUNCIL (Environmental Health)

The reduced impact from vehicle lighting is clearly an improvement. My comments however remain the same [as for the previous application] as I can see no information related to the quantification and reduction of noise levels from large scale vehicle movements from events like football late at night.

ENVIRONMENT AGENCY

The updated surface water drainage strategy still does not include deep borehole drainage and we therefore have no objections to the variation of condition 2.

HIGHWAY AUTHORITY (NCC)

No objection to any of the amendments. Having reviewed the proposed arrangements for how on-site car parking will be managed during construction, they are satisfactory and accordingly there is no need to re-impose condition 10 of planning permission FUL/2019/0066 (which sought the clarification now provided).

LEAD LOCAL FLOOD AUTHORITY (NCC)

No objection, subject to a condition requiring the surface water drainage system to be constructed in accordance with the approved details.

HISTORIC ENVIRONMENT SERVICES (NCC)

No objection subject to conditions requiring the development to be carried out in accordance with the approved written scheme of investigation and the development to

not be occupied until the site investigation and post investigation assessment has been completed.

ECOLOGIST (NCC)

No objection. The lighting plan 1300.00B shows that CWS would potentially be subject to artificial illumination at night however the contour plan does not take into account the buffering effect of trees. It is recommended that following construction, the impact of the external lighting is reviewed to ensure it complies with expectations. The documents outline what is required.

AROBORICULTURE AND WOODLAND (NCC)

No objection.

GREEN INFRASTRUCTURE AND LANDSCAPE (NCC)

No objection.

NORFOLK CONSTABULARY

Provided that the design criteria for car parks is where possible following the principles laid down in the police owned 'ParkMark' initiative, Norfolk Constabulary will be in support of the application.

LOCAL MEMBER, LAKENHAM, BRENDA LESLEY JONES

Objection. I wish to reiterate the points I made at the last application (support for the comments from the Bracondale Residents Association). I understand the City Council has also raised objections again, as have local residents. (Previous comments available in Appendix 1 of this report).

3.8. **REPRESENTATIONS**

The application was advertised by means of neighbour notification letters, site notices, and an advertisement in the Eastern Daily Press newspaper. Sixteen letters of correspondence were received from ten responders, eight explicitly objecting to the planning application and one in support. The grounds of objection and concerns raised are summarised as follows:

PRINCIPLE OF DEVELOPMENT

- Potential for “creeping development?”

PROCESS AND DRAWINGS

- The artists' drawings lack the detail that might allow us to see a positive conclusion to the project as it stands.

- The entire document is complex and technical in a manner that excludes the public.
- A complaint about the way in which these amendments are sent to us. They are hard to interpret. It would be much more courteous to write stating directly what the amendment is in plain language and how it will affect us, rather than leave us to figure out for ourselves.
- First, your timing. Coming in the run-up to Christmas and in the midst of the worsening Covid-19 pandemic, it is both inconsiderate and insensitive to invite responses when we, as a community, cannot meet to consider the proposal collectively.
- The planning portal (website) confronts the reader with a huge mass of detailed information about project. It also fails to address the full impact on your very adjacent neighbours.
- There is no succinct and readily understandable summary of the key changes, nor any indication of scale and measurements involved. We do not have the time or technical knowledge to do what we believe should be your work in presenting a clear distillation of the key facts.
- Many of our community are aged and not all are conversant with computer-based data. We are seeking is a clear explanation of the proposals that does not rely on individual, detailed analysis of many pages of statements and data.
- There is no mention in your letters of how community comment will be considered. The only clue comes in your standardised response of 18 Dec 20 which mentions the right to speak but fails to address any of our concerns. When, where, who and in what context?
- We do not see why your very near neighbours are being left uninformed and are each expected to devote their time to eliciting detail which we contend is what you and your planning colleagues are paid to do.
- We were offered a task to trawl through the mass of detail to be able to make sense of this proposal. This is not a considerate way to deal with concerned residents, who will have to cope with the consequences of this proposed project on their doorstep.
- Norfolk County Council planning department has already given NCC permission to affect the original application in a meeting on 21st August. We, therefore, are left confused as to why we have to go through this whole process again. I understand there has been a minor change to the design which requires a new application, but as to why this has happened, we are unaware.
- Having been party to the meeting on 21st August I do not believe it was impartial. There were arguments between Labour and Conservative councillors which certainly had no place in a formal meeting. There were councillors supporting the proposal entirely on personal grounds, which is not acceptable and hints at

partisanship and cronyism. I do not believe that NCC planning department operated in an entirely neutral manner.

NEED

- The need for parking needs to be reassessed in the light of new working practices after the Covid pandemic.
- The pandemic has forced people across the country to work from home. It is surely premature to be planning the provision of additional parking space.
- More people working from home now and that is a trend for the future. Why, in the face of this, provide more car parking space at County Hall?

HIGHWAYS

- Cycle lanes and safer pedestrian access to County Hall has got to be given priority to reduce dependence on motor vehicles.
- Car usage in general is being discouraged on grounds of road safety and congestion as well as pollution, which this project seems to be promoting. Several recent reports on car use in the city all urge its reduction.
- The proposals will increase traffic and congestion to the roundabout and junction which already causes blockages and congestion onto Bracondale.
- The proposal flies in the face of efforts to reduce the amount of traffic coming into Norwich, through initiatives such as Park-and-Ride.

AMENITY

- The re-introduced proposal decreases the size of the deck and offers lighting changes. These will barely reduce the harm of the intended structure. Immediate neighbours will still be heavily impacted by extra traffic noise, poorer air quality and ugliness.
- Currently, the lighting in the car park runs all night and on holidays now. Why? Will you rectify this?

SUSTAINABILITY

- These considerations are insignificant given the consequences on the worsening and potentially catastrophic climate crisis.
- There is nothing in this document to suggest that the NCC intends to take significant steps to reduce carbon emissions and pollution on their land.
- Reduction in traffic and sustainable travel is clearly a priority.

- County Hall is surrounded by park and woodland. Such areas are internationally recognized as efficient carbon sinks when managed appropriately, and it would be good to see recognition of this fact.
- More work needs to be done to encourage employees not to drive to work, such as shuttle bus from city/station/park & ride, car share scheme, paying to park.
- The council should be encouraging their employees not to drive because of the climate crisis we are all in.
- At a time when climate change is uppermost in people's minds and following a landmark ruling about a child's death being attributable to air pollution, proceeding with a plan that envisages increasing traffic flows and vehicle emissions in our immediate area cannot be right.
- The application with its reduced footprint is indeed an improvement on the original submission - but you have assumed that the stated council policy of a greener future with fewer private cars and use of public transport by employees can be ignored. This proposal runs completely counter to that and simply illustrates that councillors adapt their tales to suit their own purposes.
- Surprised at this proposal in post-Covid times when businesses are reviewing their travel policies and seeking to operate in a more environmental and cost-efficient way.

DESIGN

- Incomprehensible that no interest seems to have been taken in the internationally used echelon parking system, which for far less cost can provide more car parking spaces than required.
- The Bracondale Residents' Association has submitted an alternative proposal which entails remarking the car park to allow echelon parking which would achieve the desired increase in parking spaces at a fraction of the cost of creating the tiered car park proposed. No reference is made to this counter-proposal.
- Alternately, NCC have plenty of space on the other side of County Hall (facing on to Martineau Lane) that could be built on without affecting neighbours. Why are Norse sticking so adamantly to this scheme with all its many flaws? It really begs the question as to who is going to profit from it, because it makes no logical sense otherwise.
- Norse did not fully understand the original idea of the echelon parking or have chosen to ignore it. The whole idea is that the echelon parking would cover the whole of County Hall.
- The artist's impression of the finished effect continues to show a fence and tree planting around the perimeter. I have made this point before, but will make it again, there is no space for this unless you want to dig up what is there already. It occurs to me, again, that there has not been an effective survey of the whole site.

SOCIAL

- Very concerned about the health risks to local residents of increased air pollution which is a severe health risk that needs to be addressed. My children play in a garden bordering this car park.
- There is no mention either of why the Council has apparently disregarded the growing concerns about pollution and are proceeding with a project that will increase pollution while apparently doing nothing to discourage the use of motor vehicles.

FINANCIAL

- Why is NCC still spending money on the car park given the economic and social devastation which the covid pandemic, the adjustments for Brexit and painful cuts to services to consider.
- NCC will have budget deficits because of the demands of the pandemic. Spending £2 million at this stage cannot be justified. I also note that the Carrow House site is still for sale. The profits from the sale are, therefore, not available to alleviate against the extra spending.

LANDSCAPE AND TREES

- The plans show a wooden fence between my property and the Car Park when in fact there is a chain link fence. I think you need a proper plan to landscape these borders to include a good natural screen made up of tall trees and leafy shrubs. This would help shield our properties from air, light and noise pollution and help maintain our privacy. It would also be fantastic for wildlife.
- The artist's impression of the finished effect continues to show a fence and tree planting around the perimeter. I have made this point before, but will make it again, there is no space for this unless you want to dig up what is there already. It occurs to me, again, that there has not been an effective survey of the whole site.
- NCC are guardians of a site that includes valuable woodland, green space and rare species. It is evident from walking around the site that they are not taking this stewardship role seriously. You have an obligation to ensure that the whole county benefits from your ministrations not just the few people who want to park at County Hall.

OTHER

- Currently there is an 'out of control' Russian vine growing over & killing the trees and shrubs in this area. We have requested this be cut back repeatedly over the last decade but nothing has been done. This natural screen should be an essential part of your plans.
- It is a clear case of placing parking for council employees, or their tenants, outside the rules which apply to other businesses and premises within the city.

3.9. The letter of support can be summarised as follows:

- Understand the importance to provide your staff with this facility.
- We know it will be beneficial to the area.
- Over time Europa way has been an overflow car park for county hall staff taking up parking spaces for the businesses which work in Europa way.
- We understand that as more staff will be based at County Hall for work you need to provide this car park.
- Also, we know that you will be encouraging staff to use sustainable travel as well as walking and cycling.
- Allowing the public to use this facility also will help many other companies and the economy as you are in walking distances for the main city.
- Like all improvements in life, there is an expense, but this one-off capital investment will help in the rationalisation of the council's estate, which in return will deliver revenue savings.

3.10. **APPRAISAL**

The key issues for consideration are:

- A. Principle of Development
- B. Amenity (noise, dust, light pollution etc)
- C. Design
- D. Landscape/Trees
- E. Biodiversity
- F. Transport
- G. Sustainability
- H. Impact on Heritage Assets
- I. Flood Risk/Groundwater/Surface Water
- J. Other Consideration

3.11. **A - PRINCIPLE OF DEVELOPMENT**

A basic principle when assessing planning applications is outlined in Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004 which states:

“if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

3.12. In terms of the development plan, the County Planning Authority considers the relevant documents in relation to this application are the Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted January 2014 and Norwich Development Management Policies Local Plan adopted December 2014.

- 3.13. Whilst not part of the adopted development plan, emerging planning policies are also material planning considerations and are given more weight depending on how close they are to adoption. Policies within the National Planning Policy Framework (2019) are also material considerations capable of carrying significant weight and the National Planning Practice Guidance (NPPG) is also a material consideration though its contents are generally given lesser weight as they are guidance and not subject to the same degree of scrutiny as either national or local plan policies. The County Council's, Environmental Policy, is also a material consideration, although it is not part of the development plan.
- 3.14. The principle of the site being used as a car park is associated with the wider use of County Hall and is well established. In addition, revisions to the existing car parking arrangements (planning application FUL/2019/0066), which include the decked parking in the main car park, revisions to the annexe car park and additional parking around the annexe building have been previously considered by this committee in August 2020. A copy of the previous committee paper is attached to this report in Appendix 1. The Secretary of State for Housing, Communities and Local Government considered a request to "call in," the previous planning application. The Secretary of State decided against calling in the application and the decision of the Planning (Regulatory) Committee was issued on 24th September 2020.
- 3.15. Should members be minded to approve this application a new permission would be issued which would reflect the proposed changes. The permission would run in parallel with the previously approved scheme, with the expectation being that the applicant would implement the more recent amended version. Should members be minded to refuse this application, the applicant already has an approved scheme that they could continue to implement.
- 3.16. Officers advice is that the principle of the car park proposal was approved by planning application FUL/2019/0066. Since this approval (September 2020), there have been no substantive changes to the development plan or new information brought forward to alter the principle of a development of this nature in this location. Furthermore, the existence of a valid implementable permission on site means that officers consider that the planning balance applying to the determination of this application is a straightforward balancing exercise of weighing the benefits of the proposed amendments against any harm, in the context of the fallback position which exists. That is, should members be minded to refuse this application the applicant could implement the previous approval.
- 3.17. Officers remain of the view that the proposed development remains in principle acceptable when considered against the requirements of policy 1 of the Joint Core Strategy for Broadland, Norwich and South Norfolk (January 2014) and policies DM1 & DM16 of Norwich Development Management Policies Local Plan (December 2014) and the NPPF requirement to achieve sustainable development. Subject to a full appraisal of the benefits of the proposed amendments against any harm.

3.18. B - AMENITY (noise, dust, light pollution etc)

The most relevant policy is Norwich Development Management policy DM2 Ensuring satisfactory living and working conditions. It states that development will be permitted where it would not result in an unacceptable impact on the amenity of the area or the living or working conditions or operations of neighboring occupants. Particular regard should be given to:

- a) the prevention of overlooking and the loss of privacy;
- b) the prevention of overshadowing and loss of light and outlook; and
- c) the prevention of disturbance from noise, odour, vibration, air or artificial light pollution.

3.19. Chapter 12 of the NPPF, "Achieving well-designed places," is also a material consideration.

3.20. County Hall shares a boundary with a number of residential properties, those in closest proximity to the application areas include the residents of Conesford Drive, Churston Close, Nightingale Cottages, The Loaning and Carshalton Road. There has been concern raised relating to the impact on amenity. The issues raised have been listed in paragraph 3.7 of the report and include, the following:

- The proposed decrease in the size of the deck and lighting changes *"will barely reduce the harm of the intended structure. Immediate neighbours will still be heavily impacted by extra traffic noise, poorer air quality and ugliness."*
- *"Currently, the lighting in the car park runs all night and on holidays now, will this be rectified?"*

3.21. Norwich City Council's, Environmental Protection Officer, makes no comment regarding the reduction in the size of the deck or a specific comment relating to the re-orientation of the ramp, but considers that this will reduce the impact from vehicle lighting and is an improvement. As there is no information related to the quantification and reduction of noise levels from large scale vehicle movements from events like football late at night, his comments remain the same as for the previous application (FUL/2020/0066). The previous comments included a recommendation for a condition restricting the use of the upper deck in Development Area 3 of the application (Main Car Park) to be restricted from new access to vehicles after 17:00 on any day and on any Sunday or bank holiday by the use of a physical barrier.

3.22. In considering the approved application it was concluded that the development is acceptable, when measured against the requirements of Norwich Development Management policy DM2 and the NPPF. This is subject to a condition preventing cars from entering the decked car park after 5pm, Monday to Friday and Bank Holidays and weekends. The applicant is not proposing to amend this condition and it would remain in place to protect amenity should the application be approved.

3.23. In considering the proposed amendments, officers consider that each should be considered in turn, to establish whether an unacceptable impact on amenity would

result. Looking at each of the proposed amendments, Officers conclude on the issue of amenity:

Annex Car Park Area

- Change of 2no. external lights to the extended area of car park from pole mounted to building mounted – the minor changes proposed by virtue of the positioning and orientation would not result in an unacceptable adverse effect on the living conditions of the neighbouring residents of Nightingale Cottages, Carshalton Road or Thatched Pavilion Court.

Main Car Park Deck System

- Reduction in area of decked car park system and ramp from 3,331m² to 2,800m² (excluding stairs) - the changes are within the same footprint as the approved deck, there are no changes proposed to the overall car parking provision. The car parking layout on ground and 1st floor would be amended to suit new footprint. Officers consider that the changes being proposed are minimal and would not result in an unacceptable adverse effect on the living conditions of the neighbouring residents.
- Updating of the lighting details following revised layout of deck system:
 - Reduced number of lighting columns from 12 (including 2 on ramp) to 9.
 - Increase in column heights from 4m above deck to 6m above deck.
 - Lighting still on timeclock control for limiting hours of usage.

Officers consider that the changes to the lighting details are minimal and by virtue of the positioning, scale and orientation the light would remain contained within the site boundary and would therefore not have unacceptable adverse effect on the living conditions of the neighbouring residents.

- Reorientation of the ramp from a NE to SW direction (going up the ramp) to a SW to NE direction - officers consider that the reorientation of the ramp is acceptable and would not result in an unacceptable adverse effect on the living conditions of the neighbouring residents. It could be argued that the re-orientation would have a benefit on amenity, this point is mentioned by the Environmental Protection Officer from Norwich City Council.
- Revised elevation drawings for correction of inconsistent elevation heights shown on original application plus increase in cladding height above deck level from 1.1m to 1.3m. Adjustments as follows, max. ordnance survey elevation of car park deck - top of cladding: Original – 32.95m Revised – 33.29m Difference – +0.36m – this amendment does not have any amenity implications for the development on the ground as it just corrects an error in the original submission.
- Condition 4, additional drawing provided to demonstrate the surface water management arrangements from the deck system – officers consider that the

positioning of the downpipes for drainage will not have an unacceptable adverse effect on the living conditions of the neighbouring residents.

- Condition 8 – Additional drawing and manufacture’s information provided on the cladding material to be utilised - officers consider that the choice of cladding material would not result in glare or an unacceptable adverse effect on the living conditions of the neighbouring residents.
- Condition 10 - Temporary parking arrangements proposals document and plan to demonstrate the mitigation measure for any temporary impacts on the highways during the construction works – officers consider that the temporary arrangements for off-site parking would not have an unacceptable adverse effect on the living conditions of the neighbouring residents.
- Condition 11 - Written scheme of investigation for monitoring works under archaeological supervision to safeguard any findings of archaeological interest potentially related to Bracondale Hall – the proposed programme of monitoring of works during construct is not expected to cause an unacceptable adverse effect on the living conditions of the neighbouring residents.

3.24. Overall, officers consider that the proposed development is acceptable, when measured against the requirements of Norwich Development Management policy DM2 and the NPPF. This is subject to the retention of the condition preventing cars from entering the decked car park after 5pm, Monday to Friday and Bank Holidays and weekends. In the assessment of the proposed development as a whole, officers recommend that significant weight can be attributed to the conclusion that the proposed development would not give rise to an unacceptable adverse harm on the living conditions of the neighbouring residents.

3.25. C - DESIGN

Relevant policies include Joint Core Strategy policy JCS2 “Promoting good design,” and Norwich Development Management policy DM3 “Delivering high quality design.”

3.26. Chapter 12 of the NPPF, “Achieving well-designed places,” is also a material consideration.

3.27. Joint Core Strategy policy JCS2 “Promoting good design,” requires that all development to be designed to the highest possible standards.

3.28. Norwich Development Management policy DM3 “Delivering high quality design,” requires proposals to respect, enhance and respond to the character and local distinctiveness of the area. The layout of development to make efficient use of land and the proposal to have a positive impact in terms of its appearance and the way it is used. Developers are required to demonstrate that appropriate attention has been given to the height, scale, massing and form of new development. Appropriate consideration should also be given to the selection and choice of materials.

3.29. Decked Car Park

There revision being proposed to the decked car park include a reduction in size and the re-orientation of the access ramp. Details of the material being proposed to clad the deck has been submitted for approval, this is a requirement of condition 8 of planning permission FUL/2019/0066. In addition, the applicant is seeking to rectify an error/contradiction in the approved plans relating to height.

3.30. Looking at the amendments being proposed, Officers conclude:

Reduction in area of decked car park system and ramp from 3,331m² to 2,800m² (excluding stairs) & associated lighting changes – the drawings and artist's impressions demonstrate that the revisions generally within the same footprint as the approved deck. As such, officers consider that the positioning and orientation of the decked car park remains sympathetic to its surroundings. The deck remains positioned as far as possible in the context of the existing car park from the neighbouring properties. The massing, size and scale has been reduced but it remains as you would expect for a decked car park accommodating the number of parking spaces. The gradient of the land would still have the effect of making the deck appear taller but officers consider the design to be acceptable and not overbearing. The design amendments to the lighting are considered too be minimal and therefore acceptable. Officers consider that the proposed variation to the decked car park is acceptable in terms of the positioning, orientation, massing, size, scale and the design of lighting.

Reorientation of the ramp from a NE to SW direction (going up the ramp) to a SW to NE direction – Officers, consider that the re-orientated would enable ease of use for vehicles using the ramp, would not have a negative impact on the appearance, whilst not having an unacceptable impact on neighbours. The proposed variation is therefore considered acceptable.

3.31. In relation to the removal of the requirements of condition 8 of planning permission FUL/2019/0066 (cladding), officers note that the applicant has provided, additional drawings and manufacture's details for the proposed cladding material. The material is an oak effect vertical UPVC cladding system.

3.32. Officers consider that the choice of cladding material will result in a functional appearance to the deck but that this is acceptable in design terms. Albeit, it would not be unacceptable in the context of the area.

3.33. Norwich City Council having reviewed the variation proposal, have no specific comments to make regarding the amendments contained within the current application. They reiterate their objections from the previous application, to the principle of the development, not any design issues.

3.34. The residents have raised the following concerns relating to the design:

- The design has not taken account of the internationally used echelon parking system, which for far less cost can provide more car parking spaces than required.

- The deck could be positioned on the other side of County Hall (facing on to Martineau Lane) that could be built on without affecting neighbours.

In response, the applicant has provided a plan which compares the existing surface parking arrangements with the suggested echelon parking. This demonstrates that there would be no gain from employing the echelon parking. The applicant has not proposed to position the deck on the other side of County Hall (facing on to Martineau Lane), the application for consideration is as submitted.

- 3.35. Officers note that the applicant has provided artist's impressions of the decked car park which officers consider to adequately demonstrate the scale, massing and appearance of the proposed decked car park from a number of different viewpoints.
- 3.36. The impact that the variations to this proposal would have on the conservation area has been considered in the Heritage section of this report.
- 3.37. Overall officers consider that the revisions to the proposed decked car park, lighting and ramped access are acceptable in design terms, would not result in harm and would be in accordance with Joint Core Strategy policy JCS2, Norwich Development Management policy DM3 and the NPPF. Officers recommend that significant weight can be attributed to this conclusion in the overall assessment of the application.

3.38. Annex Car Park

The design issues to consider in the remainder of the application to vary the proposal are limited to the minor amendments to positioning of the lighting around the annex car park. This change involves positioning the external lighting on the annexe building rather than pole mounted. Officers consider that the minor changes proposed would not result in an unacceptable on the design of the annexe building and would therefore be in accordance with Joint Core Strategy policy JCS2, Norwich Development Management policy DM3 and the NPPF.

3.39. D – LANDSCAPE/TREES

The relevant policies are Norwich Development Management policies DM6 Protecting and enhancing the natural environment and DM7 Trees and development.

- 3.40. The NPPF Chapter 15 "Conserving and enhancing the natural environment," is also a material consideration.

- 3.41. Policy DM7 advises that trees and significant hedge and shrub masses should be retained as an integral part of the design of development, unless there are exceptional and overriding benefits in accepting their loss. Where the loss of trees is accepted in these circumstances, developers will be required to provide at least equivalent replacement in terms of biomass. This should be provided on-site.

- 3.42. The amendments being proposed in this application do not relate to trees on the site and the situation on site would remain unchanged from the previously approved scheme. That is, three individual C category trees (T2, T8, T10) and a 40 m section of the C category group (laurel hedgerow) will be removed for development purposes. The tree losses will be replaced with a minimum of twenty new heavy standard root-balled

or containerised trees (12 to 14 cm stem girth). The planting will be designed to be in keeping with the new development and provide landscape benefits including additional screening for the decked car park and new wildlife habitats.

- 3.43. In addition, all retained trees will be provided with proper protection during the construction phase. Protection measures will include erecting temporary protective fencing and the use of No-Dig surfaces as appropriate.
- 3.44. Planting will still take place to the north of the annex building and at the boundary between the main car park and the neighbouring properties.
- 3.45. The County, Green Infrastructure and Landscape Officer was satisfied with the previous application and has no objection to the amendments being proposed.
- 3.46. Residents have raised the following points:
- The plans show a wooden fence between my property and the car park when in fact there is a chain link fence. I think you need a proper plan to landscape these borders to include a good natural screen made up of tall trees and leafy shrubs. This would help shield our properties from air, light and noise pollution and help maintain our privacy. It would also be fantastic for wildlife.
 - The artist's impression of the finished effect continues to show a fence and tree planting around the perimeter. I have made this point before, but will make it again, there is no space for this unless you want to dig up what is there already. It occurs to me, again, that there has not been an effective survey of the whole site.
 - NCC are guardians of a site that includes valuable woodland, green space and rare species. It is evident from walking around the site that they are not taking this stewardship role seriously. You have an obligation to ensure that the whole county benefits from your ministrations not just the few people who want to park at County Hall.
 - Requests that boundary landscaping between the main car park and Conesford Drive / Churston close is undertaken with involvement of local residents.
 - The trees / hedges planting should be maintained or replaced if necessary, during the life of the deck to preserve local amenity.
- 3.47. The approved Landscape Plan & Planting Specification provides technical planting information and details of the compensation/enhancement planting scheme that will be incorporated into the development. Planting will take place to the north of the annex building and at the boundary between the main car park and the neighbouring properties. The approved landscaping plan includes a long-term management plan, which will be in place for 5 plus years, to ensure that the planting scheme is a success. Officers have considered the points raised and as the proposal does not include any changes to the previously approved scheme in regard of landscaping and trees, officers are satisfied that the approved boundary treatment remains acceptable when considered against the proposed amendments. The issues of the County Council

managing the woodland & green space (outside of the application area) and the residents request for involvement with the boundary planting have been passed to the applicant for information as these cannot be secured by condition.

- 3.48. Norwich City Council in their previous comments were concerned with the removal of the laurel hedge, but this is not for the reason that the hedgerow is significant or protected, in the context of policy DM7 but rather for the reason of the impact on amenity and not for the loss of the hedge for its own sake. The City Council in their latest comments have not raised this as a specific issue of concern.
- 3.49. The Natural Environment Team from Norfolk County Council as a whole have no objection to the proposed development in terms of arboriculture and landscape. Officers, therefore, remain of the view that the proposed development is acceptable and that the amendments would not have an unacceptable impact on trees or the landscape and would be in accordance with Norwich Development Management policies DM6 & DM7 and the NPPF. Officers recommend that moderate weight can be attributed to this conclusion in the overall assessment of the application.
- 3.50. E - BIODIVERSITY
- The relevant policies include Joint Core Strategy policy JCS1 "Addressing climate change and protecting environmental assets," and Norwich Development Management policies DM6 "Protecting and enhancing the natural environment."
- 3.51. The NPPF Chapter 15 "Conserving and enhancing the natural environment," is also a material consideration.
- 3.52. Joint Core Strategy policy JCS1 requires the environmental assets of the area to be protected, maintained, restored and enhanced and the benefits for residents and visitors improved.
- 3.53. Norwich Development Management policies DM6 which states that development will be expected to take all reasonable opportunities to avoid harm to and protect and enhance the natural environment of Norwich and its setting.
- 3.54. The applicant for the previous application carried out a desk study assessment, which includes a one-kilometre radius search for designated conservation sites (including County Hall Woods which is a County Wildlife site) and significant records of protected and priority species. A field survey was also carried out to establish baseline ecological conditions.
- 3.55. The report concluded that no direct construction impacts on designated nature conservation sites are expected, and that operational disturbances to associated wildlife can be avoided through mitigation measures. That the applicant has provided ecological compensation for the loss of the hedging and trees. Any potential minor negative impact can be mitigated, for example, light disturbance on bats, is to be mitigated by adopting a wildlife-sensitive lighting scheme. Precautionary material storage and movement, to protect hedgehogs, timing of tree felling to protect nesting birds or by using watching briefs.

- 3.56. The County Ecologist considered that the previous application was acceptable. In consideration of this application she notes that the lighting plan, reference 1300.00B shows that the County Wildlife Site would potentially be subject to artificial illumination at night, however the contour plan does not take into account the buffering effect of trees. It is recommended that following construction, the impact of the external lighting is reviewed to ensure it complies with expectations the documents outline this requirement. The County Ecologist points out that the previously approved documentation outlines this requirement so a condition is not required.
- 3.57. Officers are satisfied that the proposed amendments as described would not have a negative impact on biodiversity and the documentation provided to justify the previous application remain valid for this amendment application.
- 3.58. Officers therefore remain of the view that the proposed development is acceptable and would be in accordance with Joint Core Strategy policy JCS1, Norwich Development Management policies DM6 and the NPPF. Officers recommend that moderate weight can be attributed to this conclusion in the overall assessment of the application.
- 3.59. Appropriate Assessment
The site is situated within 10 kilometres of The Broads Special Area of Conservation (SAC) & Special Protection Areas (SPA) and the River Wensum SAC. The application has been assessed in accordance with Regulation 63 of The Conservation of Habitats and Species Regulations 2017 and based on the information submitted to the County Planning Authority (CPA), it is considered that, due to both the nature of the development and the distance from the European Sites, the proposal would not have a significant impact on these or any other protected habitat. Accordingly, no Appropriate Assessment of the development is required/or an Appropriate Assessment has been undertaken.
- 3.60. F - TRANSPORT
This section of the report considers highways issues in respect of highways access and safety. The transportation issues in so far as they relate to sustainability are considered in the sustainability section of the report.
- 3.61. Norwich Development Management policy DM30 "Access and highway safety," applies. The NPPF is a material consideration, para 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 3.62. Norwich Development Management policy DM 28 "Encouraging sustainable travel," states that development proposals must ensure, so far as is practicable, that they would not result in overall net growth across the city in travel by private car and that any anticipated increase in travel demand resulting from the development can be accommodated or diverted to non-car modes.

- 3.63. The applicant for the previous application was able to demonstrate that the increased number of spaces and thus usage would not have a detrimental impact on the surrounding highway network in terms of safety or congestion. The highway authority did not raise an objection subject to condition (condition 10) requiring the applicant to submit a scheme detailing the provision of temporary replacement parking for the duration of the construction period. The only issue relevant to this section of the report, is that the applicant is now seeking to remove condition 10 from the revised permission, by submitting the required scheme.
- 3.64. The scheme that's been submitted includes the details required by the condition on the basis of two scenarios, covid reduced parking (scenario 1) and full occupation (scenario 2). In the event that scenario 1 is taking place, the applicant explains that there would be sufficient parking available on site for the smaller number of employees attending the site on a daily basis. In the full occupation scenario, scenario 2, there would be a mix of the following measure:
- Phasing of the works to reduce spaces out of service at any one time.
 - Temporarily reducing the parking demands at the site.
 - Offering alternative contingency off-street parking in the local area if additional spaces are required.
- 3.65. The following transport related points have been raised, through the consultation:
- Cycle lanes and safer pedestrian access to County Hall has got to be given priority to reduce dependence on motor vehicles.
 - Car usage in general is being discouraged on grounds of road safety and congestion as well as pollution, which this project seems to be promoting. Several recent reports on car use in the city all urge its reduction.
 - The proposals will increase traffic and congestion to the roundabout and junction which already causes blockages and congestion onto Bracondale.
 - The proposal flies in the face of efforts to reduce the amount of traffic coming into Norwich, through initiatives such as Park-and-Ride. Reduction in traffic is clearly a priority
 - More work needs to be done to encourage employees not to drive to work, such as shuttle bus from city/station/park & ride, car share scheme, paying to park.
- 3.66. The proposed amendments would not change the number of parking spaces being proposed therefore the revisions would not increase the impact on the surrounding highway network in terms of safety or congestion. On the issue of cycle lane provision, & safer pedestrian access to County Hall these issues were covered in the previous report which concluded that the cycle and pedestrian links to County Hall maximises opportunities for sustainable transport, as do the links to public transport and the proposed development is in accordance with the requirements of policy DM28.
- 3.67. The Highway Authority has considered the content of the scheme and are satisfied that the proposals would meet the requirement of the previous condition.
- 3.68. Officers therefore consider that the proposed development, taking in to account the submitted scheme, would not have an unacceptable impact on the existing highway

network conditions or highway safety. Therefore, the proposed development, with condition 10 removed and the scheme added to the list of approved documents in condition 2 would be acceptable and in accordance with Norwich Development Management policy DM 28 and the NPPF. Officers recommend that moderate weight can be attributed to this conclusion in the overall assessment of the application.

3.69. G - SUSTAINABILITY

The relevant policies are Joint Core Strategy policies JCS1 "Addressing climate change and protecting environmental assets," & JCS 6 "Access and transportation". Norwich Development Management policies DM1 "Achieving and delivering sustainable development," DM28 "Encouraging sustainable travel," & DM31 "Car parking and servicing."

3.70. NPPF chapter 2 Achieving sustainable development and chapter 14 Meeting the challenge of climate change, flooding and coastal change are also material considerations.

3.71. Norfolk County Council's Environmental Policy is also a material consideration. Officer's concluded for the previous application that whilst falling short of providing the environmental net gain that the Environmental Policy guidance document refers to, the proposal is broadly in accordance with the Environmental Policy which is a guide for development in the County. When exercising planning judgment, it should be recognised that the County Council's Environmental Policy has not been subject to the same external scrutiny as the adopted development plan and the NPPF and is guidance to the Council only. Officers therefore recommend that the policies within the development plan and the NPPF should both carry more weight than the Environmental Policy in the assessment.

3.72. In considering the original application, the issues associated with sustainability were subject to robust debate. The previous committee report (appendix 1 of this report) consider the issue of sustainability in depth including the issues raised by Norwich City Council. Overall, the report considers the issues raised and considered relevant, these included, parking standards, energy consumption, sustainable construction, sustainable materials, sustainable drainage, the natural environment, the appropriateness of the site for sustainable development, more efficient use of the site, how the scheme would facilitate directing more staff to working in a sustainable location, where there are good links to public transport routes (bus and train) and good cycling & pedestrian access and the use of a travel plan to promote sustainable modes of travel.

3.73. Norwich City Council have maintained their objection from the previous application on the grounds of sustainability. They have not raised any specific objections to the amendments being proposed on the ground of sustainability.

3.74. The following sustainability related points have been raised, through the consultation:

- These considerations are insignificant given the consequences on the worsening and potentially catastrophic climate crisis.
- There is nothing in this document to suggest that the NCC intends to take significant steps to reduce carbon emissions and pollution on their land.

- Sustainable travel is clearly a priority.
- County Hall is surrounded by park and woodland. Such areas are internationally recognized as efficient carbon sinks when managed appropriately, and it would be good to see recognition of this fact.
- The council should be encouraging their employees not to drive because of the climate crisis we are all in.
- At a time when climate change is uppermost in people's minds and following a landmark ruling about a child's death being attributable to air pollution, proceeding with a plan that envisages increasing traffic flows and vehicle emissions in our immediate area cannot be right.
- The application with its reduced footprint is indeed an improvement on the original submission - but you have assumed that the stated council policy of a greener future with fewer private cars and use of public transport by employees can be ignored. This proposal runs completely counter to that and simply illustrates that councillors adapt their tales to suit their own purposes.
- Surprised at this proposal in post-Covid times when businesses are reviewing their travel policies and seeking to operate in a more environmental and cost-efficient way.

3.75. Officers advice remains that the principle of the car park development approved by planning application FUL/2019/0066 should not be revisited for this application as this principle has been established. It is recommended that the focus of the assessment should be on the proposed amendments and weighing the benefits of the proposed amendments against any harm, in the context of the fallback position which exists.

3.76. In considering the proposed amendments, officers consider that each should be considered in turn to establish whether their impact is acceptable in sustainability grounds including all of the issues raised by local residents and listed in paragraph 3.73. Looking at each of the proposed variations, Officers conclude on the issue of sustainability:

Annex Car Park Area

- Change of 2no. external lights to the extended area of car park from pole mounted to building mounted – the minor changes proposed would not prevent the development from meeting sustainability requirements.

Main Car Park Deck System

- Reduction in area of decked car park system and ramp from 3,331m² to 2,800m² (excluding stairs) - the changes being proposed would not prevent the development from meeting sustainability requirements.
- Updating of the lighting details following revised layout of deck system:
 - Reduced number of lighting columns from 12 (including 2 on ramp) to 9.
 - Increase in column heights from 4m above deck to 6m above deck.
 - Lighting still on timeclock control for limiting hours of usage.

Officers consider that the changes to the lighting details are minimal and would not prevent the development from meeting sustainability requirements.

- Reorientation of the ramp from a NE to SW direction (going up the ramp) to a SW to NE direction - officers consider that the reorientation of the ramp is acceptable and would not prevent the development from meeting sustainability requirements.
- Revised elevation drawings for correction of inconsistent elevation heights shown on original application plus increase in cladding height above deck level from 1.1m to 1.3m. Adjustments as follows, max. ordnance survey elevation of car park deck - top of cladding: Original – 32.95m Revised – 33.29m Difference – +0.36m – this amendment does not have any sustainability implications for the development on the ground as it just corrects an error in the original submission.
- Condition 4, additional drawing provided to demonstrate the surface water management arrangements from the deck system – officers consider that the positioning of the downpipes for drainage would not prevent the development from meeting sustainability requirements.
- Condition 8 – Additional drawing and manufacture's information provided on the cladding material to be utilised - officers consider that the choice of cladding material would not prevent the development from meeting sustainability requirements.
- Condition 10 - Temporary parking arrangements proposals document and plan to demonstrate the mitigation measure for any temporary impacts on the highways during the construction works – officers consider that the temporary arrangements for off-site parking would not prevent the development from meeting sustainability requirements.
- Condition 11 - Written scheme of investigation for monitoring works under archaeological supervision to safeguard any findings of archaeological interest potentially related to Bracondale Hall – the proposed programme of monitoring of works during construct would not prevent the development from meeting sustainability requirements.

3.77. Officers are satisfied that the proposed amendments would meet the sustainability requirements. Therefore, the proposed development is considered to be in accordance with Joint Core Strategy policies JCS1 & JCS6 and Norwich Development Management policies DM1 and DM28. Officers remain of the view that although the proposed development is not in accordance with the parking standard requirements of Norwich Development Management policy DM31, this policy should be considered as out of date until such time as it has been demonstrated that there is a clear and compelling justification that the adopted standards are necessary for managing the local road network, or for optimising the density of development in Norwich. Officers remain of the view that paragraph 106 of the NPPF should carry more weight it is a more recent

policy and it recommends maximum parking standards should only be used in certain circumstances which do not pertain in this case. The application is therefore considered to remain in accordance with para 106 of the NPPF.

3.78. H – IMPACT ON HERITAGE ASSETS

The relevant policies are Joint Core Strategy policy JCS1 “Addressing climate change and protecting environmental assets,” and Norwich Development Management policies DM1 “Achieving and delivering sustainable development,” & DM9 “Safeguarding Norwich’s heritage.”

3.79. NPPF Chapter 16 “Conserving and enhancing the historic environment,” is also a material consideration.

3.80. Joint Core Strategy policy JCS1, seeks to conserve and enhance heritage assets through the protection of their settings.

3.81. Norwich Development Management policies DM1 and DM9 expect development proposals to protect and enhance heritage assets.

3.82. An appraisal of the impacts the original application would have on the conservation area was included in the previous planning committee report (appendix 1). The appraisal was carried out in the belief that the application site in its entirety was beyond the boundary of the conservation area. During the assessment of this current application it has become apparent that a small part of the application area overlaps the conservation area. In this small area tree planting is proposed which in addition to the existing vegetation will enhance the screen between the main car park and the houses to the east. In total four trees will be planted in the gaps of the existing vegetation. Notwithstanding this fact officers have appraised the impact of the current proposal and consider that views from the conservation area into the decked car park would be restricted to the rear gardens of residential properties and a pedestrian entrance at the Loaning. Also, it remains unlikely that the decked car park would be visible from elsewhere within the conservation area. The boundary between the application site and the rear gardens of the properties in the conservation area already have an established mix of fencing and planting. The additional planting will enhance the boundary which would improve the relationship. On this basis, the proposed development is considered to not affect the character or appearance of a conservation area and is acceptable.

3.83. The NPPF sets out the weight to be given to the impact of development proposals in relation to heritage assets. In that respect, it is not considered that these proposals will result in substantial, or less than substantial harm or the total loss of significance of a designated heritage asset (NPPF para 195 &196).

3.84. There is a duty placed on the planning authority, in determining applications, to ensure that the character and appearance of the conservation area is either protected or enhanced. Officers remain of the opinion that the character of the area will change, but the change will not be harmful, given the limited public viewpoints and boundary treatments being proposed. As a result, officers consider that the duty placed on the planning authority would be met if the proposals were to be approved.

- 3.85. Norwich City Council have not raised any specific concern relating to the impact on heritage assets but have rather reiterated their objections from the previous application. They, therefore, remain of the opinion that due to its significant size, height and somewhat functional appearance; a degree of harm would be caused to the setting of the Bracondale Conservation Area. The City Council also consider that the harm to the conservation area would be less than substantial in the context of guidance within the National Planning Policy Framework paragraph 196. The City Council consider the benefits of this proposal would not outweigh the harm and as such object to the proposal on this basis.
- 3.86. There have been no heritage related objections raised by local residents in relation to the proposed amendments.
- 3.87. For completeness, whilst officers disagree with this opinion, if members consider that the development would give rise to less than substantial harm, officers consider there to be sufficient public benefits associated with the proposal to outweigh what would amount to negligible. These benefits include, the improved efficiency, service delivery and cost savings that the County Council would be able to deliver through relocating services and staff from Carrow House into County Hall (and the potential re-use of Carrow House) and the closure of the satellite offices and relocation of services.
- 3.88. Officers concluded for the previous application that the proposed development would be in accordance with the requirements of Joint Core Strategy policy JCS1, Norwich Development Management policies DM1 & DM9 and the NPPF. This was subject to conditions requiring the submission of an archaeological written scheme of investigation and approval by the local planning authority in writing. The conditions required the scheme to include an assessment of significance and a programme and methodology of site investigation and recording, a programme for post investigation assessment, provision for analysis of the site investigation and recording, provision for publication and dissemination of the analysis and records of the site investigation, provision to archive deposition of the analysis and records of the site investigation and nomination of a competent person or persons/organisation to undertake the works.
- 3.89. The applicant has submitted the written scheme of investigation as part of this application, with the aim of removing the requirement for condition 11. Norfolk Historic Environmental Service has considered the submitted scheme and are satisfied that it meets the requirements of the condition.
- 3.90. Officers are satisfied that condition 11 is no longer necessary and can be removed and the submitted scheme can be listed in condition 2 as an approved document. Officers recommend that the conditions preventing use of the main car park until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the archaeological written scheme of investigation and until provision has been made for analysis, publication and dissemination of results and archive deposition has been secured. A resident has asked whether any findings of the archaeological survey with input from Norfolk Records office and other interested parties, could be incorporated outside the application boundary in the adjacent woodland and remains of the Memorial Chapel as an enhancement. If this is feasible, officers agree that this may benefit staff and visitors to County Hall, and the wider

community. However, Officers are unable to secure this by condition as it does not directly relate to the development proposed but have made the applicant aware of the suggestion

- 3.91. Officers consider that the proposed variations subject to condition would not result in harm to any heritage assets and would be in accordance with the requirements of Joint Core Strategy policy JCS1, Norwich Development Management policies DM1 & DM9 and the NPPF.
- 3.92. The Planning (Listed Buildings and Conservation Areas) Regulations 1990 states that where an authority thinks that a development would affect the character or appearance of a conservation area, they should notify Historic England. The criteria for doing so being if the application involves the erection of a new building or the extension of an existing building and the area of land in respect of which the application is made is more than 1,000 square metres. Officers remain of the opinion that the proposed development would not affect the character or appearance of a conservation area nor does the proposal meet the criteria for notifying Historic England. In addition, as the proposed variations are considered to not affect the character or appearance of a conservation area there is no need to publicise the application as such under section 73 of the Planning (Listed Buildings and Conservation Areas) Act 1990..
- 3.93. I – FLOOD RISK/GROUNDWATER/SURFACEWATER
- The relevant policies are Joint Core Strategy policy JCS1 “Addressing climate change and protecting environmental assets,” Norwich Development Management policies DM5 Flooding and policy DM11 “Environmental hazards.
- 3.94. NPPF Chapter 14 “Meeting the challenge of climate change, flooding and coastal change,” is also a material consideration. As is Norfolk County Council’s Environmental Policy, which includes the goal of reducing the risk of harm from environmental hazards such as flooding is also a material consideration. In enacting this goal, the most relevant supporting key policy aim is through putting in place more sustainable drainage systems.
- 3.95. Joint Core Strategy policy JCS1, seeks to locate development to minimise flood risk, mitigate any risk through design and through implementing sustainable drainage.
- 3.96. Norwich Development Management policy DM5 requires all development proposals to be assessed and determined having regard to the need to manage and mitigate against flood risk from all sources. Proposals should also include mitigation measures to deal with surface water arising from development to minimise the risk of flooding on the development site and where possible reduce the risk, otherwise at least minimise the risk, within the surrounding area.
- 3.97. Norwich Development Management Policies Local Plan, policy DM11 “Environmental hazards,” requires development proposals falling within designated groundwater source protection zones or affecting a principal aquifer (as defined by the Environment Agency) to demonstrate that appropriate measures have been incorporated to minimise any risk of pollution to the water source.

- 3.98. The original application was accompanied by a Flood Risk Assessment. According to the Environment Agency flood maps the application site lies within flood zone 1. Local policies and the NPPF seek to direct inappropriate development away from areas at risk. This area is not at risk of flooding so is therefore considered acceptable in this regard. Where development is acceptable it should not increase flood risk elsewhere.
- 3.99. The proposed variations propose on minor changes to the drainage measures on the ground. The applicant is seeking to remove the requirement of condition 4 by submitting the detailed designs of the surface water drainage scheme for the decked system in the main car park.
- 3.100. The Lead Local Flood Authority have no objection to this variation or the removal of the conditions subject to a condition being attached to any consent requiring the development to be built as approved. Officers consider that this requirement would be met by listing the drainage details in the approved documents in condition 2.
- 3.101. There have been no drainage related concerns raised by residents in the relation to the proposed amendments
- 3.102. Officers consider that the flood risk, the means of surface water disposal, the maintenance and management regime of the systems and the risk to groundwater are acceptable. It is also considered that the proposed development will not increase surface water flood risk on or off the site and will improve the control of pollution. The proposed development is considered to be acceptable and in accordance with Joint Core Strategy policy JCS1, Norwich Development Management policies DM5, the NPPF and Norfolk County Council's Environmental Policy.
- 3.103. J – OTHER CONSIDERATION
- There have been comment received which question the need to increase the number of car parking spaces at County Hall. Particularly, given the current changes to working patterns that have been brought about by the Covid-19 restrictions. This has seen the number of employees parking their cars at County Hall, reduce significantly.
- 3.104. The applicant responded to this point in the previous application and pointed out that the additional car parking is needed to accommodate more staff working at County Hall. The County Council is in the process of closing satellite offices throughout the County and re-locating staff to County Hall. The applicant explains that the closures of satellite offices will allow the Council to operate in a more efficient way and reduce the cost of delivering services. On the specific issue of whether the additional car parking would be needed if the Council changes it's working behaviour with more staff working from home, the applicant states, that should this situation arise it would present further opportunities to close more satellite offices and re-locate more services in to County Hall, so the need will exist for the additional parking.
- 3.105. Officers remain satisfied that the applicant considered the issue of need and demonstrated that there will be sufficient need to justify the additional car parking spaces being proposed.

3.106. **ENVIRONMENTAL IMPACT ASSESSMENT**

In accordance with the Town and Country Planning Environmental (Impact Assessment) Regulations 2017 the application was screened on receipt and re-screened at the determination stage and it is not considered that the development would have significant impacts on the environment. No Environmental Impact Assessment is therefore required

3.107. **RESPONSES TO REPRESENTATIONS RECEIVED**

The application was advertised by means of neighbour notification letters, site notices, and an advertisement in the Eastern Daily Press newspaper in accordance with statutory requirements.

3.108. The responses to the representations are set out under each of the relevant headings in Paragraphs 3.9. to 3.106. above. In addition, below is an Officer level response to those issues not previously covered.

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| 3.109. | PRINCIPLE OF DEVELOPMENT | |
| | Potential for “creeping development?” | It is not clear exactly what is being referred to. It is reasonable to expect that any additional development on campus requiring planning permission, would be subject to full assessment. |
| | PROCESS AND DRAWINGS | |
| | The artists’ drawings lack the detail that might allow us to see a positive conclusion to the project as it stands. | Officers consider that the drawings are sufficiently detailed. |
| | The entire document is complex and technical in a manner that excludes the public. Documents are hard to interpret. It would be much more courteous to write stating directly what the amendment is in plain language and how it will affect us, rather than leave us to figure out for ourselves. | Officers are satisfied that the documentation explains the proposed development. In addition, since receiving these comments the applicant has sent directly to residents and the County Planning Authority a summary document which was the subject of a separate consultation exercise. |
| | A complaint about the way in which these amendments are sent to us. | The Town and Country Planning (Development Management Procedure) (England) Order 2015, dictates how planning applications are publicised and the consultation requirements have been met. |
| | First, your timing. Coming in the run-up to Christmas and in the midst of the worsening Covid-19 pandemic, it is both inconsiderate and insensitive to invite responses when we, as a community, cannot meet to consider the proposal collectively. | The County Planning Authority has no control over when planning applications are made. There are no measures to prevent the applicant from submitting an application at any given time. The applicant has been made aware of the concern. |

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| The planning portal (website) confronts the reader with a huge mass of detailed information about project. It also fails to address the full impact on your very adjacent neighbours. | This is the level of detail required for such an application. The applicant has since provided a summary document. |
| There is no succinct and readily understandable summary of the key changes, nor any indication of scale and measurements involved. We do not have the time or technical knowledge to do what we believe should be your work in presenting a clear distillation of the key facts. | The applicant has since provided a summary document and distributed by post. |
| Many of our community are aged and not all are conversant with computer-based data. We are seeking is a clear explanation of the proposals that does not rely on individual, detailed analysis of many pages of statements and data. | The applicant has since provided a summary document and distributed by post. |
| There is no mention in your letters of how community comment will be considered. The only clue comes in your standardised response of 18 Dec 20 which mentions the right to speak but fails to address any of our concerns. When, where, who and in what context? | All of the comments received have been considered in this report. |
| We do not see why your very near neighbours are being left uninformed and are each expected to devote their time to eliciting detail which we contend is what you and your planning colleagues are paid to do. | The applicant has since provided a summary document and distributed by post. County planning officers have been available to explain the proposal and have done so to a number of individual residents. Officers have advised on detail and the planning process. |
| We were offered a task to trawl through the mass of detail to be able to make sense of this proposal. This is not a considerate way to deal with concerned residents, who will have to cope with the consequences of this proposed project on their doorstep. | The applicant has since provided a summary document and distributed by post. |
| Norfolk County Council planning department has already given NCC permission to affect the original application in a meeting on 21st August. We, therefore, are left confused as to | The applicant has chosen to amend the application, this is their prerogative. The reason for the amendments are set out in the "Addendum Statement," submitted with the application. |

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| why we have to go through this whole process again. I understand there has been a minor change to the design which requires a new application, but as to why this has happened, we are unaware. | |
| Having been party to the meeting on 21st August I do not believe it was impartial. There were arguments between Labour and Conservative councillors which certainly had no place in a formal meeting. There were councillors supporting the proposal entirely on personal grounds, which is not acceptable and hints at partisanship and cronyism. I do not believe that NCC planning department operated in an entirely neutral manner. | This is not a material consideration for the application. If there is concern regarding the probity of officers and members this should be taken up separately. |
| DESIGN | |
| The artist's impression of the finished effect continues to show a fence and tree planting around the perimeter. I have made this point before, but will make it again, there is no space for this unless you want to dig up what is there already. It occurs to me, again, that there has not been an effective survey of the whole site. | There appears to be sufficient space for planting to supplement the existing and fill any gaps. |
| SOCIAL | |
| Very concerned about the health risks to local residents of increased air pollution which is a severe health risk that needs to be addressed. My children play in a garden bordering this car park. | Point noted and given limited weight in the assessment |
| There is no mention either of why the Council has apparently disregarded the growing concerns about pollution and are proceeding with a project that will increase pollution while apparently doing nothing to discourage the use of motor vehicles. | Point noted and given limited weight in the assessment |
| FINANCIAL | |
| Why is NCC still spending money on the car park given the economic and social devastation which the covid pandemic, the adjustments for Brexit and painful cuts to services to consider. | Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. |

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| | Officers consider that the financial issues raised are not material. |
| NCC will have budget deficits because of the demands of the pandemic. Spending £2 million at this stage cannot be justified. I also note that the Carrow House site is still for sale. The profits from the sale are, therefore, not available to alleviate against the extra spending. | Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. Officers consider that the financial issues raised are not material. |
| LANDSCAPE AND TREES | |
| The plans show a wooden fence between my property and the Car Park when in fact there is a chain link fence. I think you need a proper plan to landscape these borders to include a good natural screen made up of tall trees and leafy shrubs. This would help shield our properties from air, light and noise pollution and help maintain our privacy. It would also be fantastic for wildlife. | The landscaping plan is considered acceptable by the Natural Environment Team and officers. |
| The artist's impression of the finished effect continues to show a fence and tree planting around the perimeter. I have made this point before, but will make it again, there is no space for this unless you want to dig up what is there already. It occurs to me, again, that there has not been an effective survey of the whole site. | The landscaping plan provides detail of the finished scheme and is considered acceptable by the Natural Environment Team and officers. |
| NCC are guardians of a site that includes valuable woodland, green space and rare species. It is evident from walking around the site that they are not taking this stewardship role seriously. You have an obligation to ensure that the whole county benefits from your ministrations not just the few people who want to park at County Hall. | Advice passed on to the applicant. |
| OTHER | |
| Currently there is an 'out of control' Russian vine growing over & killing the trees and shrubs in this area. We have requested this be cut back repeatedly over the last decade but nothing has been done. This natural screen should be an essential part of your plans. | Advice passed on to the applicant. |

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| It is a clear case of placing parking for council employees, or their tenants, outside the rules which apply to other businesses and premises within the city. | It is not clear which rules are being referred to. |
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3.110. **LOCAL FINANCE CONSIDERATIONS**

In accordance with Section 70(2) of the Town and Country Planning Act 1990 (as amended) the County planning authority must have regard to a local finance consideration as far as it is material. Section 74 of the 1990 Act defines a local finance consideration as a grant or other financial assistance that has been, that will or that could be provided to a relevant authority by a Minister of the Crown, or sums that a relevant authority has received, or will or could receive, in payment of the Community Infrastructure Levy.

- 3.111. In this instance it is not considered that there are local finance considerations material to this decision.

4. Conclusion & Reasons for Decision

- 4.1. There have been sixteen third party representations from ten responders, nine objecting to the development and an objection from Norwich City Council, raising concerns about the sustainability impacts, highway safety, amenity impacts including overlooking, noise and disturbance of vehicle movements, heritage impacts, arboricultural & biodiversity impacts. The design has been questioned as well as the need for the development.
- 4.2. There are no further objections raised by statutory consultees, subject to suitably worded conditions being imposed on any grant of planning permission.
- 4.3. The application accords with the development plan and can be considered to be a sustainable form of development in line with the advice set out in the NPPF. The concerns raised by objectors can be addressed by condition, in order to make the development acceptable and there are no other material considerations that indicate that planning permission should not be permitted. Accordingly, conditional planning permission is recommended subject to the conditions set out below.

5. Alternative Options

- 5.1. Members of the Planning (Regulatory) Committee can only resolve to make a decision on the planning application before them whether this is to approve, refuse or defer the decision.

6. Financial Implications

- 6.1. The development has no financial implications from the Planning Regulatory perspective.

7. Resource Implications

- 7.1. **Staff:** The development has no staffing implications from the Planning Regulatory perspective.
- 7.2. **Property:** The development has no property implication from the Planning Regulatory perspective.
- 7.3. **IT:** The development has no IT implications from the Planning Regulatory perspective.

8. Other Implications

8.1. Legal Implications

There are no legal implications from the Planning Regulatory perspective.

8.2. Human Rights implications

The requirements of the Human Rights Act 1998 must be considered. Should permission not be granted Human Rights are not likely to apply on behalf of the applicant.

The human rights of the adjoining residents are engaged under Article 8, the right to respect for private and family life and Article 1 of the First Protocol, the right of enjoyment of property. A grant of planning permission may infringe those rights but they are qualified rights, that is that they can be balanced against the economic interests of the community as a whole and the human rights of other individuals. In making that balance it may also be taken into account that the amenity of local residents could be adequately safeguarded by conditions albeit with the exception of visual amenity. However, in this instance it is not considered that the human rights of adjoining residents would be infringed.

The human rights of the owners of the application site may be engaged under the First Protocol Article 1, that is the right to make use of their land. An approval of planning permission may infringe that right but the right is a qualified right and may be balanced against the need to protect the environment and the amenity of adjoining residents.

8.3. Equality Impact Assessment (EqIA)

The Council's planning functions are subject to equality impact assessments, including the process for identifying issues such as building accessibility.

The car park fills on a first come first serve basis. As a result of the proposals to increase the number of staff working at County Hall and despite this application proposing to increase the number of car parking spaces on site, there will be fewer spaces per employee. This means that there is potential for indirect discrimination to those employees with caring and childcare roles, who have to arrive later in the working day. This situation could be improved through Norfolk County Council as an employer better managing parking arrangements.

8.4. Health and Safety implications

There are no health and safety implications from a planning perspective.

8.5. **Sustainability implications**

This has been addressed in the sustainability section of the report above.

8.6. **Any other implications**

9. Risk Implications/Assessment

9.1. There are no risk issues from a planning perspective.

10. Select Committee comments

10.1. Not applicable.

11. Recommendations

11.1. That the Executive Director of Community and Environmental Services be authorised to:

- I. **Grant planning permission subject to the conditions outlined below.**
- II. **Discharge conditions where those detailed above require the submission and implementation of a scheme, or further details, either before development commences, or within a specified date of planning permission being granted.**
- III. **Delegate powers to officers to deal with any non-material amendments to the application that may be submitted.**

11.2. The development hereby permitted shall commence not later than three years from the date of this permission.

Reason: Imposed in accordance with Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

11.3. The development must be carried out in strict accordance with the application form, plans and documents.

The development must be carried out in strict accordance with the application form, plans and documents.

- a) 201910-DAS, Design and Access Statement, rev C, dated 23.10.20.
- b) 201910-HAS, Heritage and Archaeological Statement, rev C, dated 23.10.20.
- c) 201910-CCS, Construction Consideration Statement, rev B, not dated.
- d) 201910-AAS, Arboricultural Impact Assessment, rev A, dated 20.12.19.
- e) 201910-SS, Sustainability Statement, rev B, dated October 2020.
- f) 201910-TS, Transport Statement, rev A, dated 13.12.19.
- g) 201910-PS, Planning Statement, rev A, dated 13.12.19.
- h) 201910-FRA, Flood Risk Assessment, rev B, 28.02.20.
- i) 201910-DS, Drainage Strategy, rev D, 23.10.20.
- j) 2019.232NWS, Ecology Report Norfolk County Hall. Final, rev A, 27.03.20.
- k) 2019.232.1, County Hall Landscape Plan, rev A, 08.04.20.
- l) 201910-100-001.B, Location Plan, rev B, 23.10.20.
- m) 201910-100-002.B, Site Plan, rev B, 23.10.20.
- n) 201910-101-001.B, Site Plan – Annex A Proposed, rev B, 23.10.20.

- o) 201910-101-003.B, Sections B-B Existing and Proposed rev B, 23.10.20.
- p) 201910-101-004, Proposed Plan DA2, rev A, 03.04.20.
- q) 201910-101-005, Proposed Sections DA2, rev A, 03.04.20.
- r) 201910-101-008, Artists Impression DA3, rev B, 23.10.20.
- s) 201910-101-009, Artists Impression DA3, rev B, 23.10.20.
- t) 201910-101-010, Artists Impression DA3, rev B, 23.10.20.
- u) 201910-101-011, Artists Impression DA3, rev A, 23.10.20.
- v) 201910-120-001, DA2 Exceedance Flooding Plan, rev A, 13.04.20.
- w) 201910-C510-001, Proposed Drainage Plan DA2, rev A, 28.02.20.
- x) 201910-C510-002, Drainage Details DA2, rev A, 28.02.20.
- y) 201910-C700-001, Pavement Details DA1, rev A, 03.04.20.
- z) 201910-C700-002, Pavement Details, rev A, 03.04.20.
- aa)201910-C700-003, Pavement Details DA2, rev A, 03.04.20.
- bb)201910-C1300-001, Proposed lighting scheme DA1, rev A, 03.04.20.
- cc)201910-C1300-002, Proposed lighting scheme DA2, rev A, 03.04.20.
- dd)201910-C2500-001, Acoustic fence, rev A, 03.04.20.
- ee)201910-C3000-001, Arboricultural plan DA1, rev A, 03.04.20.
- ff) 201910-C3000-002, Arboricultural plan DA3, rev A, 03.04.20.
- gg)201910-ATC, Additional Transport Correspondence, rev A, 20.04.20.
- hh)Dekboard, Fire Performance Data Sheet, Prepared by Dekboard, not dated.
- ii) Dekboard, Load Span Technical Information, Prepared by Dekboard, not dated.
- jj) Proposed Lighting, PP4179BRD, Prepared by Yesss Electrical, 08.11.20.
- kk)Proposed Lighting, PP4179BRD, Prepared by Yesss Electrical, 08.11.20.
- ll) Proposed Car Park, Ground Floor Plan, 2002-10.03 rev P3, dated 11.11.20.
- mm) Proposed Car Park, First Floor Plan, 2002-10.04 rev P3, dated 11.11.20.
- nn)Proposed Car Park, Drainage Plan, 2002-10.05 rev P2, dated 11.11.20.
- oo)Proposed Car Park, Ground Floor Lighting Layout, 2002-10.06 rev P2, dated 11.11.20.
- pp)Proposed Car Park, Deck Lighting Layout, 2002-10.07 rev P2, dated 11.11.20.
- qq)Proposed Car Park, Elevations, 2002-11.01 rev P4, dated 11.11.20.
- rr) Proposed Car Park, Section Thru Deck, 2002-11.02 rev P2, dated 11.11.20.
- ss)Proposed Car Park, Cladding Elevations and Details, 2002-11.04 rev P2, dated 11.11.20.
- tt) Proposed Lighting Scheme DA1, 1300.001.B rev B, 23.10.20.
- uu)201910 - Norwich County Council Car Park Addendum Statement rev A, prepared by Icarus Consulting Limited, dated 23.10.20.
- vv)201910 - Norwich County Council Car Park, Surface Water Drainage Strategy, rev D, prepared by Icarus Consulting Limited, 23.10.20.
- ww) County Hall Car Park Construction Temporary Parking Provisions and Arrangements, rev 02, prepared by Norse, 11.11.2020.
- xx) Written Scheme of Investigation for Monitoring of Works Under Archaeological Supervision and Control, version 1.1, prepared by Chris Birks Archaeological Services, dated May 2020.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 11.4. Prior to the first use, the surface water drainage system shall be constructed in accordance with the submitted FRA (Flood Risk Assessment; Norwich County Hall Car Park, ICARUS Consulting Limited, Project ref 201910, Document ref 201910-B, Revision B, Dated February 2020 and the revised drainage strategy (Surface Water Drainage Strategy; 201910 Norwich County Hall Car Park, ICARUS Consulting Limited, Document ref 201910-B, Revision B, Dated 10 April 2020) together with the Soakaway design calculations for soakaways DA2CA1 - DA2CA9 (ICARUS Consulting limited, Project ref 201910-NCC, Dated February 2020). The approved scheme will be implemented prior to the first use of the development and maintained for the lifetime of the development.

Reason: To prevent flooding in accordance with Norwich Development Management Policies Local Plan DM5 and the National Planning Policy Framework paragraph 163,165 and 170.

- 11.5. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect and prevent the pollution of the water environment (particularly the Secondary A and Principal aquifers, Source Protection Zone 1, nearby abstractions and EU Water Framework Directive Drinking Water Protected Area), in accordance with Norwich Development Management Policies Local Plan policy DM11.

- 11.6. No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To protect and prevent the pollution of the water environment (particularly the Secondary A and Principal aquifers, Source Protection Zone 1, nearby abstractions and EU Water Framework Directive Drinking Water Protected Area), in accordance with Norwich Development Management Policies Local Plan policy DM11.

- 11.7. The use of the upper deck in Development Area 3 of the application (Main Car Park) shall be restricted from new access to vehicles after 17:00 on any day and on any Sunday or bank holiday by the use of a physical barrier.

Reason: To protect amenity in accordance with Norwich Development Management Policies Local Plan policy DM2.

- 11.8. During the first year of use an approved Full Travel Plan based on the Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. The approved Full Travel Plan shall be implemented in accordance with the timetable and targets contained therein and shall

continue to be implemented as long as any part of the development is occupied/in use subject to approved modifications agreed by the County Planning Authority in consultation with the Highway Authority as part of the annual review.

Reason: To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment in accordance with Norwich Development Management Policies Local Plan policy DM28.

- 11.9. No development shall take place within Development Area 3 of the application (Main Car Park) other than in accordance with the Written Scheme of Investigation for Monitoring of Works Under Archaeological Supervision and Control, version 1.1, prepared by Chris Birks Archaeological Services, dated May 2020, approved under condition 2.

Reason: To protect heritage assets in accordance Norwich Development Management Policies Local Plan policies DM1 and DM9

- 11.10. The Development Area 3 of the application (Main Car Park) shall not be allowed to be in use until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation for Monitoring of Works Under Archaeological Supervision and Control, version 1.1, prepared by Chris Birks Archaeological Services, dated May 2020, approved under condition 2 and the provision for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To protect heritage assets in accordance Norwich Development Management Policies Local Plan policies DM1 and DM9.

- 11.11. The scheme titled County Hall Car Park Construction Temporary Parking Provisions and Arrangements, rev 02, prepared by Norse, 11.11.2020, approved under condition 2 shall be implemented throughout the construction period.

Reason: To ensure adequate off-street parking during construction in the interests of highway safety Norwich Development Management Policies Local Plan policy DM30. This needs to be a pre-commencement condition as it deals with the construction period of the development.

Background Papers

Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted Jan. 2014 (JCS).

<https://www.greaternorwichgrowth.org.uk/planning/joint-core-strategy/>

Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan).

https://www.norwich.gov.uk/info/20199/local_plan

The National Planning Policy Framework (NPPF) (2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf?_ga=2.81687703.1498971390.1566921834-1965140127.1559835065

Planning Practice Guidance (2014)

<https://www.gov.uk/government/collections/planning-practice-guidance>

Norfolk County Council, Environmental Policy

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/natural-environment-policies/environmental-policy>

Officer Contact

If you have any questions about matters contained in this paper or want to see copies of any assessments, equality impact assessment, please get in touch with:

Officer name: Neil Campbell **Tel No:** 01603 222724

Email address: neil.campbell3@norfolk.gov.uk



If you need this report in large print, audio, braille, alternative format or in a different language please contact 0344 800 8020 or 0344 800 8011 (textphone) and we will do our best to help.

Planning (Regulatory) Committee

Item No:

| | |
|---|--|
| Decision making report title: | FUL/2019/0066 Norfolk County Council, Martineau Lane, Norwich, NR1 2DH. |
| Date of meeting: | 21st August 2020 |
| Responsible Cabinet Member: | N/A |
| Responsible Director: | Tom McCabe, Executive Director of Community and Environmental Services |
| Is this a key decision? | No |
| If this is a key decision, date added to the Forward Plan of Key Decisions. | N/A |
| <p>Executive Summary</p> <p>Planning permission is sought for Construction of a new car park to the perimeter of the Annex building, upgrade including surface water drainage to existing Annex car park and the installation of a single car park deck to main car park.</p> <p>The applicant is the Corporate Property Team, Norfolk County Council.</p> <p>The application has generated 53 third party representations, from 37 individuals. Their concerns relate primarily to the need for the additional parking being proposed, the number of new spaces being proposed, and the impacts of the proposal on the surrounding highway network and residential amenity. There is one objection from a statutory consultee (Norwich City Council).</p> <p>The quality of the design and the sustainability credentials of the proposal have been carefully considered along with the impacts on amenity, visual amenity, landscape & trees, groundwater/surface water & flood risk, highways safety, ecology, heritage and archaeology.</p> <p>It is considered that the proposed development on this site is in accordance with the development plan and national planning policy. The proposal is therefore considered to be acceptable subject to conditions and there are no material considerations of sufficient weight to justify a refusal.</p> <p>Recommendation:</p> <p>That the Executive Director of Community and Environmental Services be authorised to:</p> <p>I. Grant planning permission in principle, subject to any call in by the Secretary of State</p> | |

- II. **Subject to any call in by the Secretary of State, grant planning permission subject to the conditions outlined in section 11.**
- III. **Discharge conditions where those detailed above require the submission and implementation of a scheme, or further details, either before development commences, or within a specified date of planning permission being granted.**
- IV. **Delegate powers to officers to deal with any non-material amendments to the application that may be submitted.**

1. Background

1.1. Secretary of State for Housing, Communities and Local Government “Call In”

The Secretary of State for Housing, Communities and Local Government has received a request to intervene in this planning application. The Secretary of State can call in any planning application at any time during the planning application process, up to the point at which the LPA makes the decision. In this instance, it has been confirmed that the Secretary of State will consider whether to call in this application once the application has completed the planning process at the local level and only if members are minded to approve. Therefore, should members be minded to approve this application the recommendation is it that planning permission is granted in principle, subject to any call in by the Secretary of State. If the planning application is called in there will be a public inquiry at which the Council will make its case and the Secretary of State will determine whether or not to grant planning permission. This means that if members are minded to grant planning permission a decision notice cannot be issued until a set period of time has elapsed in which the Secretary of State decides whether or not to call in the application.

- 1.2. Planning Application FUL/2019/0066 has not been reported to the planning committee previously. Relevant site history includes:

| Application Reference | Description of development | Decision | Date of decision |
|------------------------------|--|-----------------|-------------------------|
| Y/4/2016/4001 | Planning application for permanent car parking area to replace an area previously used for car parking and currently being used as a contractor's compound/storage area. | Permitted | 14/07/2016 |
| Y/4/2018/4002 | Planning application for a permanent car parking area with 218 car parking spaces to | Permitted | 14/05/2018 |

| | | | |
|---------------|--|-----------|------------|
| | replace an area previously used for car parking and a contractor's compound/storage area. The proposed scheme includes a drainage system, lighting scheme, and a barrier and pay station system | | |
| FUL/2019/0028 | <p>Proposed alterations to County Hall. The alterations comprise:</p> <ul style="list-style-type: none"> -Replacement and new windows and doors to improve thermal and acoustic performance. -New external escape stairs/ramps -Regrading of external surfaces to improve level access but without increasing surface area of hard standing. -New mechanical plant equipment for internal environment-controlled system -Reconfiguration of internal office space to provide flexible working space -New evacuation lift and entrance to North Wing (previously Norfolk Constabulary) -New insulated membrane roof to North Wing -Reconfiguration of internal office space to accommodate County Coroner's court. -Provision of new restaurant to cater for staff only. -Provision of additional dedicated disabled and visitor parking for the Coroner's Court. | Permitted | 02/03/2020 |

2. Proposals

2.1. **SITE**

2.2. County Hall campus is the central hub and the most significant premises operated by Norfolk County Council. It holds the highest number of employees and hosts the largest amount of the Norfolk County Council delivered critical activities.

2.3. The County Hall building dates from 1968 and is prominently located at the south eastern edge of Norwich and visible from some distance when approaching the City. The building comprises of the main tower, north and south wings and is locally listed by Norwich City Council. The Annex Building is a more recent addition and is of prefabricated modular construction.

2.4. The campus site has extended grounds which cover an area of approximately 13.3 ha and includes parkland, a car parking area and a belt of trees which have a County Wildlife Site Designation.

2.5. **PROPOSAL**

2.6. The application seeks to increase the number of available car parking spaces on the County Hall campus by 128 spaces and improve the condition/standard of the existing car parking area around the annex building. The proposed development includes the following elements:

- The creation of new timber styled clad, steel car parking deck to the main car park. Including the addition of new LED lighting to integrate with the existing system.
- The creation of new car parking area to the north and east of the annex building. Including the addition of new LED lighting to integrate with the existing system in the main annex a car park.
- Removal of existing trees and hedgerows to maximise the available space around the annex building, a replacement acoustic fencing and mitigation planting to act as a barrier.
- The new car park area around the annex building will be constructed of a granular fill material, including drainage, regulation layers, and a demarcation system for the parking bays.
- New LED lighting for the new areas, operating from dawn to dusk with time clock settings and integrated into the existing car park lighting system.
- A SuDS drainage system (permeable surfacing) and soakaways at the annex building area. Oil and silt interceptor and/or attenuation is proposed to ensure the existing and new car parking area are drained to the current regulations and standards to avoid surface water flooding.
- Resurfacing of the existing Annex car park and reconfiguration of the parking spaces to maximise utilisation.

3. **Impact of the Proposal**

3.1. **DEVELOPMENT PLAN POLICIES**

The following policies of the Joint Core Strategy for Broadland Norwich and South Norfolk (adopted 2014) (JCS) and Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan) provide the development plan framework for this planning application. The following policies are of relevance to this application:

Joint Core Strategy for Broadland, Norwich and South Norfolk

Policy 1 Addressing climate change and protecting environmental assets

Policy 2 Promoting good design

Policy 3 Energy and water

Policy 6 Access and transportation

Policy 12 The remainder of the Norwich urban area including the fringe Parishes

Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)

DM1 Achieving and delivering sustainable development

DM2 Ensuring satisfactory living and working conditions

DM3 Delivering high quality design

DM6 Protecting and enhancing the natural environment

DM7 Trees and development

DM9 Heritage

DM11 Environmental hazards

DM16 Supporting the needs of business

DM28 Encouraging sustainable travel

DM30 Access and highway safety

DM31 Car parking and servicing

3.2. **OTHER MATERIAL CONSIDERATIONS**

The Revised National Planning Policy Framework (NPPF) was published February 2019 and sets out the Government's planning policies for England and how these should be applied. Whilst not part of the development plan, policies within the are also a further material consideration capable of carrying significant weight. The NPPF highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. It goes on to state that achieving sustainable development means the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: economic, social and environmental. The NPPF places a presumption in favour of sustainable development. However, paragraph 47 states that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

3.3. Paragraph 48 of the NPPF states, in summary, that local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan; the extent to which there are unresolved

objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the NPPF.

3.4. **Greater Norwich Local Plan (Regulation 18 Draft Plan)**

The Greater Norwich Development Partnership which includes Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan. The public consultation on the latest version of the plan, regulation 18 Draft Plan closed in March this year. The draft plan is still evolving and at a relatively early stage of preparation, therefore, limited weight can be given to it in the consideration of this application.

3.5. Furthermore, because this is a planning application for the County Council's own development, whilst not part of a development plan or itself a planning policy, Norfolk County Council's Environmental Policy adopted in November 2019 is also material to the decision.

3.6. **CONSULTATIONS**

NORWICH CITY COUNCIL (Planning)

Objection. The substantial overprovision of parking conflicts with policies JCS1, DM1, DM28 and DM31 of the development plan and the aims of national planning policy, which requires development to promote sustainable travel patterns and reduce the impacts on climate change and the environment. The application does not provide sufficient justification to justify a departure from the adopted parking standards in this instance. The proposal would be harmful to the visual appearance and character of the area, contrary to policies JCS2 and DM3.

It is considered that due to its form, scale and appearance the parking structure would cause harm to the setting of the Conservation area. There are capacity issues at the Martineau Lane roundabout. The application does not assess the impact on ecological features. The removal of the mature hedgerow next to the annex building and replacement with a 3.2 timber fence along the boundary with no. 15 and 16 Nightingale Cottages is another concerning aspect of the proposal.

NORWICH CITY COUNCIL (Environmental Health)

There is the potential for increased impacts and harm to arise from the use of the upper deck of the car park for evening football matches and similar events when there is lower background noise at a more sensitive time of day. This should be restricted by condition unless it can be demonstrated through a

lighting assessment and noise impact assessment that the impacts can be mitigated to an acceptable level.

ENVIRONMENT AGENCY No objection, subject to conditions and on the grounds that deep infiltration is no longer proposed.

HIGHWAY AUTHORITY (NCC)

No objection subject to a condition requiring a full travel plan and temporary parking arrangements in place for staff during the construction phase. The number of car and cycle parking spaces appropriate for County Hall was examined by members in detail in 2016 as part of planning application Y/4/2016/4001. The applicants design and access statement indicate there will be an over provision of parking by 32 spaces. The number corresponds with the LHA's calculations. When considered as a percentage against the total number of spaces on the campus, the LHA has indicated it would be prepared to accept 32 spaces as being de-minimis provided the application is accompanied by a fully costed travel plan.

The Transport Statement has been carried out correctly and that there are no issues with the methodology or conclusions. An interim travel plan has been submitted and is acceptable.

LEAD LOCAL FLOOD AUTHORITY (NCC)

No objection, subject to conditions. To ensure that the drainage systems are constructed prior to first use and prior to commencement details of how surface water run-off from the decked car park will be managed.

HISTORIC ENVIRONMENT SERVICES (NCC)

No objection subject to condition. Part of the application area will impinge on the site of the now vanished Bracondale Hall. There is potential that heritage assets with archaeological interest (buried archaeological remains) relating to the lost hall may be present at the site and that their significance will be affected by the proposed development.

ECOLOGIST (NCC)

No objection. The ecological report and revised landscaping plan address our concerns. With these in place, impacts on ecology will be minimised.

AROBORICULTURE AND WOODLAND (NCC)

No objection. The ecological report and landscaping plan submitted by Norfolk Wildlife Services, satisfy previous concerns regarding wildlife considerations and adequate mitigation for tree losses.

GREEN INFRASTRUCTURE AND LANDSCAPE (NCC)

The documents submitted address previous concerns raised in relation to the location proposed for the replacement trees and the two lighting columns and the visual impact of the proposed deck structure in the main car park. The development will provide necessary mitigation for the loss of landscaping for the proposals to take place.

NORFOLK CONSTABULARY

Observations only. Clearly defined routes, staff & emergency vehicle parking & parking to be designed to the police owned "ParkMark," initiative. Pleased to see the 3.2m high fence. All trees will need to be pruned to allow clear lines of sight.

LOCAL MEMBER, LAKENHAM, BRENDA LESLEY JONES

Supports comments from the Bracondale Residents Association which are:

Resources Committee reported, Council staff working practices have changed and more staff are now working from home. The "anticipated increase of 10% in County Hall occupier numbers over next two years," has not materialised. Unlikely to justify NCC's car parking expansion proposal for County Hall. NCC's Corporate Asset Management Plan 2016-2019, promotes a revised operating model, using ICT, electronic documentation, Wi-fi, video conferencing and remote connectivity... Less office space & time travelling. The cost of the proposal 128 extra car-parking spaces is estimated to be £1.9 million. As a comparison, the cost of the recently commissioned South-East car park providing 226 spaces was estimated as £250,000 - £400,000. When assessed against the Norwich Local Development Plan (DM 31) car parking facilities on the site are already over provided.

The proposal appears largely to ignore NCC's public duty and environment policy to encourage alternatives to car use such as walking, cycling and public transport. The dangerous pedestrian crossing point at the Bracondale/King Street junction and provision of a Bracondale cycle lane should be high on the agenda for discussions between NCC and Norwich City Council before any expansion of County Hall car parking. Particularly in view of the East Norwich Partnership planning for development of the 123-acre old Carrow Works, Deal and Utilities sites with the mooted building of 4,000 homes and provision of 6,000 jobs.

The Heritage statement accompanying the proposal is superficial and inadequate. given the historic nature of the site which is exactly where Bracondale Hall stood before it was demolished in 1966.

The design and materials are low quality and harmful to the amenity value of neighbouring properties and the Bracondale Conservation Area. NCC has

already admitted that the proposed design fails to meet the “Secured by Design” standards for car parks or Park Mark Accreditation. The design also fails to do any credit to NCC as a commissioner of Norfolk buildings with potential for winning design awards.

Bracondale Residents’ Association considers the process whereby it appears that NCC can in effect accept its own Planning proposal, subject only to an Appeal to the Minister responsible in Central Government, is an abuse of its duty to the public.

Uncertainty about the numbers people who will return to working at County Hall such an expansion may well prove to be unnecessary. Unprecedented financial pressures an act of absolute folly at this difficult time. Temporary parking spaces could be purchased from the Carrow works until the need can be clearly established. This application is disregarding the advice given by Development Management at Norfolk (sic) City Council. This development is totally contrary to the Council’s stated aims of tackling climate change.

CLIVE LEWIS MP

Keen to support the resident’s objections and go on the record about his reasons also.

3.7.

REPRESENTATIONS

The application was advertised by means of neighbour notification letters, site notices, and an advertisement in the Eastern Daily Press newspaper. 53 letters of correspondence were received from 37 members of the public all explicitly objecting to the planning application. The grounds of objection and concerns raised are summarised as follows:

PRINCIPLE OF DEVELOPMENT

- Potential for “creeping development?”
- Granting own permission impact on democracy?
- The Council should change the pay on foot car park or the tennis courts to staff parking.
- The proposal is contrary to Norwich Adopted Local Plan
- The proposal is contrary to the emerging Greater Norwich Local Plan. Although currently in draft plan, the GNLP should inform the decision-making process, and is a material consideration, particularly Page 33, Paragraph 126 and the area-wide masterplan for East Norwich Urban Area which is very close to the County Hall site.

NEED

- It is not established that there is inadequate provision on the site at present and re-provision to support those facilities relocating will result in duplication of parking at Carrow House etc.

- Delay the decision for 12 months, so that better informed on the future need.
- Does the need still exist given the current changes to working patterns brought about by the Covid 19 pandemic?
- The assessment of need on which the proposal was based is out-of-date. The expected increase has not materialised. The planned relocation of staff would still not justify an expansion.

HIGHWAYS

- The impact of an additional 128 cars all leaving at once on Norwich City FC match days seems not to have been considered. The cars take a very long time to leave as they are at the end of a long exit chain.
- A perceived addition of between 500 to 600 cars in the main car park.
- There is no evidence to suggest that there is adequate provision of cycle shelters.
- Not enough thought on a creative and flatter car- free access to county hall by bicycle.
- There's a lack of genuine walking and cycling routes in the vicinity, narrow pavements, poor crossings and too many kerbs.
- Cycle parking should be improved with more parking near the entrance to County Hall.
- The car park has recently been resurfaced, it's wasteful to dig it up for this proposal.
- Consideration should be given to The Department of Transport's "Future of Mobility: Urban Strategy, 2019," particularly pages 13-14 (para 2.7 to 2.9 & 2.11 to 2.12) from the report.
- Pedestrians and other vulnerable road users, cyclists, and those arriving by bus and train should all be given equal consideration for accessing the site by these methods of travel, as part of the principle of equality.
- The Council has submitted a proposal to the Transforming Cities Initiative, but this plan is for a retrogressive transformation.

AMENITY

- An acoustic barrier should also be provided on the eastern boundary to protect residents from the additional light, noise and chemical pollution accruing from the increased volume of onsite traffic.
- The deck will cause overlooking causing a loss of privacy for the residents.
- Noise pollution from the use of the car park.
- The construction phase will have an impact on amenity for a duration.
- Failure to consider the amenity impact associated with the current and future use of the car park areas for events & football match parking.
- Damage to nearby homes by building work e.g. pile driving

SUSTAINABILITY

- The Council should be making better use of the Park-and-Ride facility by extending service hours and running additional shuttle busses to its sites.

- The proposal makes no provision for charging of electric vehicles, nor apparently for retrofitting such facilities in the future.
- There is an absence of any assessment of the impact from CO2 and other pollutants deriving from the additional vehicles.
- On matchdays cars have their engines running and lights on, creating a lot of fumes and light pollution in Carshalton Road.
- The Annex car park should be closed on match days for environmental reasons.
- The Council should be reducing single occupancy trips.
- The Council has an ambitious and bold environmental policy to achieve net zero carbon emissions on its estates by 2030.
- County Hall site is very close to an Air Quality Management Area. Will this be affected?
- An independent assessment of how Air Quality at the County Hall site would be affected would also be beneficial.
- Air pollution is estimated to cause approximately 40,000 excess deaths per year in the UK [reference: Reducing air pollution in the UK: Progress report 2018, Royal College of Physicians].
- Increasing car parking space is contrary to Council policy of encouraging travellers to use alternative forms of transport to the car.
- The Council should be setting an example by working towards zero provision of workplace parking, not increasing existing provision.
- The Council should be leading the way in adopting sustainable transport solutions as the authority for strategic transport planning in Norfolk.
- There's nothing to demonstrate that alternatives to car use have been considered?
- No substantive assessment of how this proposal performs against sustainable transport policies.
- The proposal is not in alignment with the Norfolk County Council Environmental Policy.
- The development is not in accordance with National Planning Policy Framework, Section 9 Promoting Sustainable Transport, Paragraph 102.
- County Hall is well served by buses and within cycling or walking distance of much of the city. It is time for the County Council to re-appraise its approach on this issue and start reducing parking provision rather than increasing it.
- The Norwich Adopted Local Plan DM31 Car Parking and Servicing should be the relevant plan. The Parking Standards for Norfolk 2007 document should not carry any weight, as it is out of date.
- This development neither supports alternatives to car travel, nor encourages sustainable travel, requirements of the Council's Environmental Policy.
- Norfolk County Council's Interim Travel Plan explicitly states (page 5) the travel plan should aim to reduce car parking spaces by not less than 1% year on year for the duration of the travel plan.
- Request that a condition is made to the effect that there should be no further net gain in parking spaces for Electric Vehicles, but they should replace the standard car parking spaces.
- The development is not in accordance with National Planning Policy Framework, Section 9 Promoting Sustainable Transport, Paragraph 102.

DESIGN

- There are few examples of attractive looking multi-story car-parks. This will be visible from locations in Conesford Drive, within the Bracondale Conservation Area, as well as from the Martineau Lane roundabout, the main eastern approach to the City.
- The submission lacks an artist's impression of the proposal.
- The drawings are difficult to view online.
- Poor quality design. The architectural design team that drew up the plans are based in Luton and perhaps, therefore, are unaware of the nature and value of the neighbourhood.
- Does the decked car park include disabled access?
- Has the structure been designed to prevent it providing a refuge for undesirable behaviour out of hours?
- Design issues, negative contribution to local amenity and harm to the setting of the Bracondale Conservation area.
- As result of the slope and the design of the decked car park it would appear quite tall and overbearing from the lower slope not in accordance with the NPPF para 127 c) states that planning decisions should ensure that developments are which sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change of the NPPF .
- Not in accordance with NPPF para 127 a) & b).
- The steel pillars would have a negative impact and be dominate when viewed from ground level, quite a 'busy' look.
- The appearance of the deck would have a negative impact on the open space area of the County Hall site.
- Secured by Design and Park Mark accreditation • As the car park is not designed to the Secured by Design standards nor seeks Park Mark accreditation; this should be re-referred to the Architectural Liaison & Crime Prevention Officer for comment, as it was their recommendation.
- The deck structure has poor efficiency of design, it would have a negative contribution to local amenity, and will harm the setting of the Bracondale Conservation Area. The gain of 84 net spaces due to the deck structure do not outweigh these harms.

SOCIAL

- The proposals appear to be based on out-of-date location plans that do not describe the properties adjacent to the eastern boundary of the Annex car park.
- The pre-application consultation did not include all the residents.
- Security issues maintaining such an enlarged site.

FINANCIAL

- The business case for the development is not available.

- Question whether the additional parking deck provides value for money, given the construction cost and the relatively few places it will add, given the places deleted by the support and access structures.
- The main car park was resurfaced just last summer and your proposal to now dig this up seems not only a monumental waste of taxpayers' money.
- Would the money not be better spent on facilitating ride sharing and transport to the park-and-ride facilities.
- Construction costs including piling.
- The cost of the development and the cost/benefit should be included in the application details?
- De-value neighbouring properties.
- Question the wisdom of going ahead with a £1.9 million construction project at, what will undoubtedly be, the expense of more pressing social need and more urgent infrastructure projects.
- Spend the money on a pedestrian crossing on Bracondale instead of a car park.

HERITAGE

- Bracondale Hall falls within area to be built on. The underground remains of this building might be damaged and that future archaeological works compromised.
- The impact on the conservation area has not been considered.
- Decked car park through design causes harm to the setting of the Bracondale Conservation area. There's no clear or convincing justification provided in the context of para 194 of the NPPF.
- The proposed deck also harms the relationship between the Conesford Drive townhouses and County Hall (which is a locally-listed building, although not part of the conservation area).

LANDSCAPE AND TREES

- Four small category C trees against the eastern Annex boundary are in poor condition and should be removed.
- There should be landscape mitigation around the deck.
- The proposed additional screening suggested by the applicant would reduce the significance of the townhouses, as they form part of the local amenity of the current car park site. It would also reduce natural surveillance of the car park.

CUMULATIVE IMPACT

- Highways impacts including cumulative 2,000 new homes on the former Colman estate
- The sale of Carrow House and surrounding land is being offered as a development opportunity, inevitably adding to an already congested road system around the entrance to County Hall.

3.8.

APPRAISAL

The key issues for consideration are:

- A. Principle of Development
- B. Amenity (noise, dust, light pollution etc)
- C. Design
- D. Landscape/Trees
- E. Biodiversity
- F. Transport
- G. Sustainability
- H. Impact on Heritage Assets
- I. Flood Risk/Groundwater/Surface Water
- J. Other Consideration

3.9.

A - PRINCIPLE OF DEVELOPMENT

A basic principle when assessing planning applications is outlined in Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004 which states:

“if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

3.10.

In terms of the development plan, the County Planning Authority considers the relevant documents in relation to this application are the Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted January 2014 and Norwich Development Management Policies Local Plan adopted December 2014.

3.11.

Whilst not part of the adopted development plan, emerging planning policies are also material planning considerations and are given more weight depending on how close they are to adoption. Policies within the National Planning Policy Framework (2019) are also material considerations capable of carrying significant weight and the National Planning Practice Guidance (NPPG) is also a material consideration though its contents are generally given lesser weight as they are guidance and not subject to the same degree of scrutiny as either national or local plan policies. The County Council's, Environmental Policy, is also a material consideration, although it is not part of the development plan.

3.12.

The Joint Core Strategy for Broadland, Norwich and South Norfolk (January 2014) sets the strategic context for the area, the key policy being Policy 1: Addressing climate change and protecting environmental assets. In the context of the Norwich Development Management Policies Local Plan, (December 2014), the key sections are titled “Sustainable development principles for Norwich,” key policy DM1 “Achieving and delivering sustainable

development,” and “Supporting the needs of business,” key policy DM16 “Employment and Business development.”

3.13. JCS Policy 1 states that, to address climate change and promote sustainability, all development will be located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to a changing climate and more extreme weather. The policy includes a list of requirements for development, the most relevant to this application include:

- Be energy efficient
- Be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage
- Protect groundwater sources
- Make the most efficient appropriate use of land, with the density of development varying according to the characteristics of the area, with the highest densities in centres and on public transport routes
- Minimise the need to travel and give priority to low impact modes of travel
- Be designed to mitigate and be adapted to the urban heat island effect in Norwich
- Improve the resilience of ecosystems to environmental change

The environmental assets of the area will be protected, maintained, restored and enhanced and the benefits for residents and visitors improved.

3.14. Policy DM1 states that subject to the detailed policies in the plan, development proposals will be expected (through their design, configuration, visual appearance, location, means of access and spatial and functional relationship to existing uses and facilities) to:

- Enhance and extend accessible opportunities for employment, whilst enabling balanced, sustainable economic growth in the Norwich economy.
- Protect and enhance the physical, environmental and heritage assets of the city and to safeguard the special visual and environmental qualities of Norwich for all users;
- Help to combat the effects of climate change and achieve national and local carbon reduction targets by making the most efficient practicable use of resources, minimising the overall need to travel, reducing dependency on the private car and high-emission vehicles and ensuring ease of access to facilities and services for all users both now and in the future;
- Provide for a high level of safety and security, maximising opportunities for improved health and well-being and safeguarding the interests of the elderly and vulnerable groups;
- Help to promote mixed, diverse, inclusive and equitable communities, by increasing opportunities for social interaction, community cohesion, cultural participation and lifelong learning.

In determining applications for development, the council will afford equal weight to the economic, environmental and social dimensions of sustainability as expressed in this policy.

- 3.15. DM16 supports proposals which would provide for or assist in the creation of high-quality employment, inward investment and allow accessible and equitable job opportunities for all will be permitted where consistent with the overall sustainability objectives set out in policy DM1 and other policies of the plan.
- 3.16. In principle, officers consider the application site to be acceptable in land use terms for the continued use as a car park. The site has for some time been used as a staff car park, as well as for parking during Norwich City football home matches. The existing use is, therefore, well established and the principle of parking on the application site is accepted.
- 3.17. In policy terms officers consider that the site meets the policy requirements in JCS1 and DM1 (full assessment in the sustainability section of the report). In short, the site is within an area at low risk of flooding, in Norwich which is a main Centre which reduces the need to travel. County Hall has excellent public transport, cycling & pedestrian links, therefore officers consider the site to be a sustainable location.
- 3.18. The applicant explains that the proposed development is needed to meet increasing staff numbers and service provisions at County Hall. As set out in the recently approved application FUL/2019/0028 there will be 379 staff members re-located into County Hall (309 from Carrow House (Norwich) and 70 from other satellite offices in the county). Officers consider it appropriate for County Hall, a sustainable location to be considered suitable for an intensification of the existing use. Such an intensification would result in the land being used more efficiently, which is a main environmental objective for achieving sustainable development.
- 3.19. The 128-space increase being proposed would effectively cater for the 379 relocated staff members. In real terms, this represents a reduction in the number of spaces available per staff member. In addition, parking on the site, (in the main) is restricted to 3 days per week for staff and all staff are encouraged to either work from an alternative location or use an alternative mode of transport on two “*non-parking*,” days per week. The applicant has also demonstrated through submission of an Interim Travel Plan that the site has good cycle access & parking, pedestrian access, public transport links and showering facilities.
- 3.20. In terms of policy DM16 the re-location of services and staff potentially from outside of the Norwich area into County Hall would have the effect of providing more accessible & equitable job opportunities in the Norwich area. The supporting text to policy DM16 states that proposals for economic development outside the identified employment areas (including the extension and intensification of existing businesses) will be permitted where they meet

the sustainable development criteria in policy DM1, satisfy the amenity requirements set out in policy DM2 and transport requirements as set out in policies DM28 and DM31.

3.21. Officers therefore consider that the proposal is in principle acceptable when considered against the requirements of policy 1 of the Joint Core Strategy for Broadland, Norwich and South Norfolk (January 2014) and policies DM1 & DM16 of Norwich Development Management Policies Local Plan (December 2014) and the NPPF requirement to achieve sustainable development. Subject to a full appraisal of the overall objectives set out in policies DM2, DM28 & DM31 and other policies of the development plan and all other material considerations.

3.22. B - AMENITY (noise, dust, light pollution etc)

The most relevant policy is Norwich Development Management policy DM2 Ensuring satisfactory living and working conditions. It states that development will be permitted where it would not result in an unacceptable impact on the amenity of the area or the living or working conditions or operations of neighbouring occupants. Particular regard should be given to:

- a) the prevention of overlooking and the loss of privacy;
- b) the prevention of overshadowing and loss of light and outlook; and
- c) the prevention of disturbance from noise, odour, vibration, air or artificial light pollution.

3.23. Chapter 12 of the NPPF, "Achieving well-designed places," is also a material consideration.

3.24. County Hall shares a boundary with a number of residential properties, those in closest proximity to the application areas include the residents of Conesford Drive, Churston Close, Nightingale Cottages, The Loaning and Carshalton Road. There has been a number of third-party responses raising concerns relating to the impact on amenity. The issues raised have been listed in paragraph 6.8 of the report and include, the following:

- An acoustic barrier should also be provided on the eastern boundary to protect residents from the additional light, noise and chemical pollution accruing from the increased volume of onsite traffic.
- The deck will cause overlooking causing a loss of privacy for the residents.
- Noise pollution from the use of the car park.
- The construction phase will have an impact on amenity for a duration.
- Failure to consider the amenity impact associated with the current and future use of the car park areas for events & football match parking.
- Damage to nearby homes by building work e.g. pile driving

3.25. Officers have considered these issues and note that the applicant has submitted a Construction Consideration Statement which includes details of the construction phase and measures to protect amenity. The Environmental

Protection Officer has considered the application and has not raised concern with the proposed construction phase, issues of overlooking or noise during normal operating hours. Concern has been raised with the level of information available for any use of the decked car park for football match parking. This issue is covered below.

3.26. Decked Car Park

The Environmental Protection Officer at Norwich City Council has considered the proposed development including details of the proposed lighting and construction consideration statement submitted by the applicant. He considers that there would be some increase in noise and vehicle movements associated with the parking structure, but that this must be considered within the context of similar impacts which arise from the site's current use as a car park. He considers it unlikely that material harm would arise during normal use related to office working hours, on the basis that light pollution and noise is minimised by the timber effect cladding. Officers can confirm that timber cladding is being proposed.

3.27. The Environmental Protection Officer also considers that there is the potential for increased impacts and harm to arise from the use of the upper deck of the car park for evening football matches and similar events when there is lower background noise at a more sensitive time of day. He suggests that such use should be restricted by condition in the event the application is approved, unless it can be demonstrated through a lighting assessment and noise impact assessment that the impacts can be mitigated to an acceptable level. The applicant in response has made clear the desire to carry out the required surveys with a view to identifying whether there would be any impacts and if so, provide mitigation. However, they have stated that due to the current Covid 19 restrictions it has not been possible to carry out the necessary survey work. Therefore, officers are recommending a condition to restrict entrance to the decked car park after 5pm Monday to Friday and weekends. Should the applicant want to vary this condition they have the option to submit a S73 application when the restrictions are lifted, and the survey work has been carried out.

3.28. Annex Car Park

The amendments to the annex car park require the removal of the mature hedgerow next to the annex building and replacement with a 3.2 metres high timber fence along the boundary with no.'s 15 and 16 Nightingale Cottages. The Environmental Protection Officer at Norwich City Council has not raised concern and considers that the "acoustic nature of hedging is negligible whereas fencing will block noise." The planning team at Norwich City Council has raised concern on the basis that the fence would be "*overbearing and unsightly for the occupiers of the residential properties which would face it at close proximity.*" The applicant in response has introduced some additional planting which the City Council has welcomed but still feel that this aspect of the proposal is a cause for concern. Their concern does not amount to an

objection. It is noted that the residents of Nightingale Cottages have not objected to the proposed development. Officers do not share the same view and consider that the fence would not prove to be overbearing or unsightly.

3.29. Overall, Officers consider that the proposed development is acceptable, when measured against the requirements of Norwich Development Management policy DM2 and the NPPF. This is subject to a condition preventing cars from entering the decked car park after 5pm, Monday to Friday and Bank Holidays and weekends.

3.30. C - DESIGN

Relevant policies include Joint Core Strategy policy JCS2 “Promoting good design,” and Norwich Development Management policy DM3 “Delivering high quality design.”

3.31. Chapter 12 of the NPPF, “Achieving well-designed places,” is also a material consideration.

3.32. Joint Core Strategy policy JCS2 “Promoting good design,” requires that all development to be designed to the highest possible standards.

3.33. Norwich Development Management policy DM3 “Delivering high quality design,” requires proposals to respect, enhance and respond to the character and local distinctiveness of the area. The layout of development to make efficient use of land and the proposal to have a positive impact in terms of its appearance and the way it is used. Developers are required to demonstrate that appropriate attention has been given to the height, scale, massing and form of new development. Appropriate consideration should also be given to the selection and choice of materials.

3.34. Decked Car Park

The decked car park would be positioned on the main car park which is sloped, the difference in ground level north west – south east is approximately 2 metres. The deck is proposed to be 3 metres above the ground level (north west) and allowing for the slope approximately 5 metres (south east). The slope runs towards County Hall, so the 3-metre height would be presented to the boundary.

3.35. The decked car park would be approximately 78 metres by 45 metres and clad in a continuous oak effect vertical UPVC cladding system. The deck is positioned approximately 30 and 48 metres from the nearest residential properties which are on Conesford Drive.

- 3.36. Through the consultation concern has been raised that:
- The decked car park would result in a significant change to the appearance of the site and by its scale and appearance would be harmful to the visual appearance and character of the area. It would have a negative impact on visual amenity and be visible from locations on Conesford Drive, within the Bracondale Conservation Area, as well as from the Martineau Lane roundabout, the main eastern approach to the City. The gain of 84 net spaces due to the deck structure is said to not outweigh these harms.
 - As result of the slope and the design of the decked car park it would appear quite tall and overbearing from the lower slope not in accordance with the NPPF para 127 c) states that planning decisions should ensure that developments are which sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change of the NPPF.
 - The proposed development is not in accordance with NPPF para 127 a) & b).
 - The steel pillars would have a negative impact and be dominate when viewed from ground level, quite a 'busy' look.
 - The appearance of the deck would have a negative impact on the open space area of the County Hall site.
- 3.37. Norwich City Council consider that due to its significant size, height and somewhat functional appearance, a degree of harm would be caused to the immediate character of the area. They consider that the impacts would be largely confined to within the County Hall campus itself, with the current main car park being reasonably well screened by existing tree planting.
- 3.38. The applicant states that the design has sought to minimise the impact of the car park deck by keeping the height to a minimum. The structure has been orientated to ensure that the shortest elevation is facing the adjacent conservation area and the external frame would be clad in light oak UPVC timber effect vertical cladding.
- 3.39. Officers note that the applicant has provided artist's impressions of the decked car park which officers consider to adequately demonstrate the scale, massing and appearance of the proposed decked car park from a number of different viewpoints.

- 3.40. Officers consider the positioning and orientation of the decked car park is sympathetic to the surroundings. The deck is, positioned as far as possible in the context of the existing car park from the neighbouring properties and is orientated to enable ease of use for vehicles using the ramp to the deck, whilst not having an unacceptable impact on neighbours. The massing, size and scale are as you would expect for a decked car park accommodating this number of parking spaces. Officers note that the slope would have the effect of making the deck appear taller but consider the design to be acceptable and not overbearing. The appearance whilst functional would also be acceptable subject to a condition to secure precise details of the cladding. Officers recommend a condition to ensure that the precise details of the cladding is acceptable and retained in accordance with the submitted details, prior to first installation.
- 3.41. The impact that the proposal would have on the conservation area has been considered in the Heritage section of this report.
- 3.42. Officers consider that the decked car park is acceptable in design terms and would be in accordance with Joint Core Strategy policy JCS2, Norwich Development Management policy DM3 and the NPPF.
- 3.43. Annex Car Park
- The design issues to consider in the remainder of the application are associated with the annex car park and are limited to the proposed fence and groundworks. The groundworks to the layout of the car parking areas are considered to be functionally acceptable for the purpose of parking and in design terms acceptable, due to their elevation being at ground level and the materials such as kerbing and paving etc. being as you would expect. The fence is proposed to be 3-metre high closed board timber acoustic fencing. Norwich City Council (planning) have raised concern that a fence of this scale and appearance would be overbearing and unsightly for the occupiers of the residential properties which would face it at close-proximity. Officers consider that the fence whilst quite high would not be unacceptable on design grounds and therefore in accordance with Joint Core Strategy policy JCS2, Norwich Development Management policy DM3 and the NPPF. The occupiers of the residential properties in question have been consulted and have not raised any objections.
- 3.44. D – LANDSCAPE/TREES

The relevant policies are Norwich Development Management policies DM6 Protecting and enhancing the natural environment and DM7 Trees and development.

- 3.45. The NPPF Chapter 15 “Conserving and enhancing the natural environment,” is also a material consideration.
- 3.46. Policy DM7 advises that trees and significant hedge and shrub masses should be retained as an integral part of the design of development, unless there are exceptional and overriding benefits in accepting their loss. Where the loss of trees is accepted in these circumstances, developers will be required to provide at least equivalent replacement in terms of biomass. This should be provided on-site.
- 3.47. The applicant has carried out an assessment of the trees that may be affected by the proposed development. The assessment highlights that three individual C category trees (T2, T8, T10) and a 40 m section of the C category group (laurel hedgerow) will be removed for development purposes. The tree losses will be replaced with a minimum of twenty new heavy standard root-balled or containerised trees (12 to 14 cm stem girth). The planting will be designed to be in keeping with the new development and provide landscape benefits including additional screening for the decked car park and new wildlife habitats.
- 3.48. All retained trees will be provided with proper protection during the construction phase. Protection measures will include erecting temporary protective fencing and the use of No-Dig surfaces as appropriate.
- 3.49. The applicant has also provided a Landscape Plan & Planting Specification, which provides technical planting information and details of the compensation/enhancement planting scheme that that will be incorporated into the development. Planting will take place to the north of the annex building and at the boundary between the main car park and the neighbouring properties.
- 3.50. There has been concern from local residents that:
- Four small category C trees against the eastern Annex boundary are in poor condition and should be removed.
 - There should be landscape mitigation around the deck.
 - The proposed additional screening suggested by the applicant would reduce the significance of the townhouses, as they form part of the local

amenity of the current car park site. It would also reduce natural surveillance of the car park.

Officers have considered the points raised and are satisfied that the loss of the trees would be mitigated by replacement planting, the native landscape planting being proposed as a screen for the decked car park is suitable for that purpose and would not have a negative impact on the significance of the properties. Therefore, the proposed development is acceptable in these regards.

- 3.51. Norwich City Council are concerned with the removal of the laurel hedge, but this is not for the reason that the hedgerow is significant or protected, in the context of policy DM7 but rather for the reason of the impact on amenity and not for the loss of the hedge for its own sake. This issue is covered in the amenity section of the report.
- 3.52. The Natural Environment Team from Norfolk County Council have no objection to the proposed development in terms of arboriculture and landscape. Officers therefore, consider that the proposed development is acceptable in this regard and would be in accordance with Norwich Development Management policies DM6 & DM7 and the NPPF.
- 3.53. E - BIODIVERSITY
The relevant policies include Joint Core Strategy policy JCS1 "Addressing climate change and protecting environmental assets," and Norwich Development Management policies DM6 "Protecting and enhancing the natural environment."
- 3.54. The NPPF Chapter 15 "Conserving and enhancing the natural environment," is also a material consideration.
- 3.55. Joint Core Strategy policy JCS1 requires the environmental assets of the area to be protected, maintained, restored and enhanced and the benefits for residents and visitors improved.
- 3.56. Norwich Development Management policies DM6 which states that development will be expected to take all reasonable opportunities to avoid harm to and protect and enhance the natural environment of Norwich and its setting.
- 3.57. The applicant has carried out a desk study assessment, which includes a one-kilometre radius search for designated conservation sites (including County

Hall Woods which is a County Wildlife site) and significant records of protected and priority species. A field survey was also carried out to establish baseline ecological conditions.

- 3.58. The applicant is proposing a new 165 m2 area of shrubbery along the boundary to the north of the annex area which will provide ecological enhancements. Planting is also between proposed on the boundary between the main car park and the residential properties on Conesford Drive and Chursford Close.
- 3.59. The report concludes that no direct construction impacts on designated nature conservation sites are expected, and that operational disturbances to associated wildlife can be avoided through mitigation measures. That the applicant has provided ecological compensation for the loss of the hedging and trees. Any potential minor negative impact can be mitigated, for example, light disturbance on bats, is to be mitigated by adopting a wildlife-sensitive lighting scheme. Precautionary material storage and movement, to protect hedgehogs, timing of tree felling to protect nesting birds or by using watching briefs.
- 3.60. Officers consider that the proposed development is acceptable and would be in accordance with Joint Core Strategy policy JCS1, Norwich Development Management policies DM6 and the NPPF.
- 3.61. Appropriate Assessment
The site is situated within 10 kilometres of The Broads Special Area of Conservation (SAC) & Special Protection Areas (SPA) and the River Wensum SAC. The application has been assessed in accordance with Regulation 63 of The Conservation of Habitats and Species Regulations 2017 and based on the information submitted to the County Planning Authority (CPA), it is considered that, due to both the nature of the development and the distance from the European Sites, the proposal would not have a significant impact on these or any other protected habitat. Accordingly, no Appropriate Assessment of the development is required/or an Appropriate Assessment has been undertaken.
- 3.62. F - TRANSPORT
This section of the report considers highways issues in respect of highways access and safety. The transportation issues in so far as they relate to sustainability are considered in the sustainability section of the report.

- 3.63. Norwich Development Management policy DM30 “Access and highway safety,” applies. The NPPF is a material consideration, para 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 3.64. The applicant has submitted a Transport Statement in support of the application which includes an assessment of the highway impacts associated with the proposed scheme. This includes an existing microsimulator “BASE” model created in 2019 which uses traffic survey data collected in May 2017 and updated traffic survey data from October 2019, this was to ensure that the additional traffic is accounted for going in to County Hall and the existing Pay & Display car park. The BASE model has a car park capacity of 1160 spaces.
- 3.65. A copy of the BASE model was used with an extra 128 vehicles travelling to the County Hall car park (not the Pay and Display) to simulate the extra demand for the new car park spaces, this is the ‘OPTION’ model. The OPTION model car park has a capacity of 1288 (An additional 128 spaces). The network management conclusion is that the proposal should have minimal impact on existing network conditions.
- 3.66. The following transport related points have been raised, through the consultation:
- The impact of an additional 128 cars all leaving at once on Norwich City FC match days seems not to have been considered. The cars take a very long time to leave as they are at the end of a long exit chain.
 - A perceived addition of between 500 to 600 cars in the main car park.
 - There is no evidence to suggest that there is adequate provision of cycle shelters.
 - Not enough thought on a creative and flatter car- free access to county hall by bicycle.
 - There’s a lack of genuine walking and cycling routes in the vicinity, narrow pavements, poor crossings and too many kerbs.
 - Cycle parking should be improved with more parking near the entrance to County Hall.
 - The car park has recently been resurfaced, it’s wasteful to dig it up for this proposal.
 - Pedestrians and other vulnerable road users, cyclists, and those arriving by bus and train should all be given equal consideration for accessing the site by these methods of travel, as part of the principle of equality.

These issues have been considered in the assessment and given limited weight. Traffic modelling indicates there will be minimal impact to the local road network caused by football traffic. The additional vehicles would arrive steadily over several hours with payment taken beyond the internal

roundabout. This allows adequate queueing space and prevents impact to the Martineau Lane roundabout. During departure, any additional traffic would be an internal queueing issue and would not negatively impact the local road network.

Alternative modes of transport such as walking and cycling will be addressed through the travel plan.

3.67. Two further issues have been raised through the consultation:

- Consideration should be given to The Department of Transport's "Future of Mobility: Urban Strategy, 2019," particularly pages 13-14 (para 2.7 to 2.9 & 2.11 to 2.12) from the report.

Officers have considered the issue quoted and consider the proposed development is acceptable.

- The Council has submitted a proposal to the Transforming Cities Initiative, but this plan is for a retrogressive transformation.

Officers have considered this issue and consider that the proposed development is not in conflict with the initiative.

3.68. Norwich City Council understands that there are current capacity issues at the Martineau Lane roundabout where the access to County Hall is located and that this is a major constraint to development within East Norwich. They consider that the impact should be considered cumulatively alongside the impact on committed strategic development sites in east Norwich. They consider that, measures should be taken to reduce pressure on the junctions, not increase it.

3.69. The Highway Authority have undertaken detailed traffic modelling of the roundabout and conclude that the assessment included within the Transport Statement has been carried out correctly. Accordingly, the Highway Authority has no issues with the methodology or conclusions.

3.70. Officers therefore consider that the proposed development would not have an unacceptable impact on the existing highway network conditions or highway safety. The proposed development is therefore in accordance with Norwich Development Management policy DM 28 and the NPPF.

3.71. G - SUSTAINABILITY

The relevant policies are Joint Core Strategy policies JCS1 “Addressing climate change and protecting environmental assets,” & JCS 6 “Access and transportation”. Norwich Development Management policies DM1 “Achieving and delivering sustainable development,” DM28 “Encouraging sustainable travel,” & DM31 “Car parking and servicing.”

3.72. NPPF chapter 2 Achieving sustainable development and chapter 14 Meeting the challenge of climate change, flooding and coastal change are also material considerations. Norfolk County Council’s Environmental Policy is also material consideration.

3.73. The applicant has submitted a sustainability statement with the application which focusses on energy consumption (LED lighting, recycled materials), water (sustainable drainage), waste (recycling or re-using construction waste), community & social needs (reduce the fear of crime, disabled access & landscaping), the natural environment (retain and enhance habitats) and the built environment (protecting listed buildings and archaeology).

3.74. In addition to the sustainability statement, the applicant explains that the additional car parking is required to meet a need for spaces which will be brought about through the relocation of staff in to County Hall following the closure of the Carrow House office and a number of unknown satellite offices. Officers note that the planning status of Carrow House does not appear to be changing and detailed information relating to which of the Council’s satellite offices are to be closed has not been forthcoming, as such only limited weight can be given to these issues in the assessment.

3.75. Parking Standards

Norwich Development Management policy DM31 says that to ensure appropriate levels of parking and service, developments should incorporate parking, servicing and other facilities in accordance with the advice and standards set out within appendix 3 of the plan. The supporting text says that in order to ensure that development is sustainable, local parking policies, alongside other planning and transport measures, should act to promote sustainable transport choices and reduce reliance on the private car for work and other journeys.

3.76. Norwich City Council object to the proposal due to the number of parking spaces being proposed exceeds the number of spaces set out in the adopted parking standards. Officers can confirm that the number of spaces being

proposed does exceed the adopted parking standard figure from appendix 3 by 203 spaces and therefore the proposal is contrary to policy DM31.

- 3.77. Officers note that in applying the standards, the City Council has not raised concern that the increase in parking space would result in an unacceptable impact on the highway, highway safety or that the application of the standards in this instance, is necessary for managing the local road network.
- 3.78. Since adoption of the Norwich Development Management Plan, the NPPF has been revised. Para 106 of the NPPF now states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport. Officers have assessed the evidence that supports policy DM31 in the local plan and it appears to lack the more recent requirement for a clear and compelling justification that the standards are necessary for managing the local road network. Therefore, the use of the parking standards to promote sustainable travel patterns is not in accordance with the requirements of the NPPF.
- 3.79. Norwich's Development Management Plan states that where the relevant policies are out of date at the time of making the decision the local plan states that the council will grant permission unless material considerations indicate otherwise, taking into account whether:
- any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework (NPPF) taken as a whole; or
 - specific policies in that framework indicate that development should be restricted.

The NPPF paragraph 11 (The presumption in favour of sustainable development), also states that where the policies which are most important for determining the application are out-of-date, granting permission unless:

- the application of policies in this Framework (NPPF) that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

3.80. Officers therefore consider that the number of car parking spaces should not be assumed to be excessive and so unsustainable, simply on the basis of policy DM31 and the adopted car parking standards, which have yet to be justified in terms of the current revised NPPF. A wider assessment is required against the requirements of policies JCS1, DM1 and DM28. In addition, Officers consider Joint Core Strategy policy JCS6 relevant as this seeks to concentrate development close to essential services and facilities to encourage walking and cycling as the primary means of travel with public transport for wider access.

3.81. In addition to car parking numbers, policy DM31 also sets out requirements for cycle parking, disabled parking, provision for electric car charging points, service provision (refuse collection etc.) and space is provided for the operation of a car club vehicle. County Hall campus meets all of the requirements except for the provision of electric charging points. The applicant in response to this point states that *“sustainable forms of transport and in particular the provision of electric car charging points at County Hall and other Council premises is being addressed under a separate specific project, outside of the remit of this project and application. The County Council are committed to providing charging points for its staff to lower carbon emissions.”*

Officers consider that the proposed development is acceptable when considered against the requirements of policy DM31.

3.82. JCS1 requires development to be located and designed to promote sustainability in order to address climate change. The proposed development is compliant with the following aspect of the policy:

- Energy efficient – the applicant has submitted a sustainability statement which confirms the energy efficiencies being proposed. These include, procurement of materials to prioritise renewable or sustainable sources with low energy impact. Any timber used, including fencing will be sourced from Forest Stewardship Council (FSC) certified product suppliers or equivalent. Maximise the reuse and recycling of aggregate on site. Design of the proposed levels to minimise the amount of excavation required. The use of LED lighting and photocells to minimise the amount of energy required to illuminate the car parks.
- The County Hall site is located in an area of low flood risk. Any risk would be mitigated through design and the implementation of sustainable drainage (See flood risk section).

- The design of the scheme protects groundwater sources with improvement incorporated. Surface water will be directed away from a deep bore soakaway into more sustainable permeable paving and shallow soakaways.
- The proposal uses the site in a more efficient way, by increasing the capacity on a very similar footprint. It also facilitates the use of the office space in a more efficient way.
- The scheme would facilitate directing more staff to working in a sustainable location, where there are good links to public transport routes (bus and train) and good cycling & pedestrian access. Given the ration of staff to desks at County Hall, staff are also encouraged to work from home on a regular basis. The overall effect is the reduction in the number of car trips, particularly if staff are being moved from less sustainable satellite office locations into County Hall.
- Give priority to low impact modes of travel. The interim travel plan submitted in support of the application demonstrates the County Council's commitment to alternatives to the car. There are 2,800 members of staff currently working at County Hall. This is set to increase by a further 379, following the closure of Carrow House (309) and satellite offices (70). There will be 1,288 available car parking spaces, should this application be approved, which equates to approximately 1 space per 2.5 staff members. The ratio of spaces per employee will reduce as a result of this application, with 128 spaces being provided for 379 re-located staff.
- The scheme would see a net increase of a minimum of 17 new heavy standard root-balled or containerised trees which would help to mitigate Norwich's urban heat island effect.
- Improve the resilience of ecosystems to environmental change. As covered in the biodiversity section of the report, the scheme through the planting of a new 165m² area of shrubbery (approximately 3m wide x 55m long) will offer compensation bird nesting habitat, which in time should exceed that currently offered.

The environmental assets of the area will be protected, maintained, restored and the benefits to visitors to County Hall will be improved, without unacceptable harm to local residents.

As set out in the Biodiversity section of the report there will be no adverse impacts on European and Ramsar designated sites and no adverse impacts on European protected species in the area.

The proposal meets the remaining policy requirements to conserve and enhance existing environmental assets of acknowledged local importance (CWS). Wildlife resources will provide through additional and replacement planting. The built environment, heritage assets, and the wider historic environment will be conserved and protected.

Officers therefore consider that the proposed development is in general accordance with JCS 1.

- 3.83. JCS6 states that the transportation system will be enhanced to develop the role of Norwich as a Regional Transport Node, this will be achieved by (most relevant to the consideration of this application):

The concentration of development close to essential services and facilities to encourage walking and cycling as the primary means of travel with public transport for wider access. Whilst continuing to recognise that in the most rural areas the private car will remain an important means of travel.

Officers consider that the proposed development is in accordance with these requirements with development being located close to essential services and the provision of car parking spaces in recognition of staff members that need to use a car. It is considered that the proposal strikes the correct balance.

- 3.84. Norwich Development Management policy DM1 expects development proposals through their design, configuration, visual appearance, location, means of access and spatial and functional relationship to existing uses and facilities to meet criteria. Officers consider that the proposed development is compliant with the following criteria set out in the policy:

The proposal meets the policy requirement to enhance and extend accessible opportunities for employment.

The proposal is considered to meet the policy requirement to protect/safeguard the visual and environmental qualities of Norwich.

The applicant has demonstrated how the proposal would make efficient use of resources through the use of recycled & ethically sourced materials in the construction phase and energy efficient lighting during operation. County Hall

is a sustainable location and a good location to intensify an existing B1 use. Directing more staff to such a sustainable location, with good transport links, would have the effect of minimising the overall need to travel and the potential to reduce dependency on the private car and high-emission vehicles. The proposal through its location ensures ease of access to facilities & services for all users, both now and in the future, another policy requirement. Whilst additional car spaces are being proposed the ratio of spaces per each member of staff will see a reduction, with 128 spaces being provided for 379 new staff members.

The proposal provides for a high level of safety and security. County Hall has an on-site 24-hour security presence and CCTV. Norfolk Constabulary concur and have suggested that the applicant applies for Safer Parking Scheme Accreditation.

In assessing the application against the requirements of policy DM1 policy officers have afforded equal weight to the economic, environmental and social dimensions of sustainability and consider that the proposal is generally compliant with the policy. The proposal is considered to be in accordance with the requirements of policy DM1 and therefore acceptable.

- 3.85. Norwich Development Management policy DM 28 “Encouraging sustainable travel,” states that development proposals must ensure, so far as is practicable, that they would not result in overall net growth across the city in travel by private car and that any anticipated increase in travel demand resulting from the development can be accommodated or diverted to non-car modes.
- 3.86. The applicant has confirmed that the staff being re-located from Carrow House (which is only a short distance from County Hall) will have their parking days restricted to 3 days per week. In addition, public transport should prove to be a more attractive alternative for relocated staff, with links to County Hall being more convenient and comprehensive than at Carrow House. The relocated staff will also benefit from better cycling and pedestrian links and will be able to realise the benefits described in the travel plan. This improve the chances of seeing a reduction in the number of vehicles on the highway in the vicinity of County Hall.
- 3.87. The only potential net growth could be from the 70 additional staff that would be relocated from the closure of other satellite offices. Officers consider this number not to be significant, given that parking restrictions will be in place and the opportunities for sustainable travel options.
- 3.88. Officers consider that the proposed development is in accordance with the remainder of DM28’s policy requirements. The cycle and pedestrian links to County Hall maximise opportunities for sustainable transport, as do the links to

public transport. The campus already maximises accessibility to and permeability within the site for pedestrians and cycles, with excellent links to nearby services (including bus stops, within the site).

- 3.89. The proposal is considered to be broadly in accordance with the requirements of policy DM28 and therefore acceptable.
- 3.90. The NPPF has three overarching objectives to achieving sustainable development, they are economic, social & environmental. The NPPF is clear that these objectives are interdependent and need to be pursued in mutually supportive ways.
- 3.91. Officers consider that the proposed development would help to meet the economic objective, to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right place and at the right time to support growth and improved productivity.
- 3.92. Officers consider that the proposed development would help to meet the social objective, it is well-designed and safe and accessible to services.
- 3.93. Officers consider that the proposed development would help to meet the environmental objective. The development contributes to protecting and enhancing the natural, built and historic environment; it makes more effective use of land, helps to improve biodiversity and the design uses natural resources prudently. There is some debate whether the development would minimise pollution, and mitigating climate change, however for the reasons set out in the report the development is considered acceptable in this sustainable location.
- 3.94. Norfolk County Council's Environmental Policy is also material consideration. The County Council has made a commitment to use the policy to guide all the Council's future decision-making.
- 3.95. The policy includes goals which form the basis for framing the environmental policy. Officers consider that the proposed development does not conflict with the following goals:
- Ensuring a clean and plentiful water supply
 - Encouraging a thriving plant and wildlife community
 - Reducing the risk of harm from environmental hazards such as flooding and drought

- Using resources from nature more sustainably and efficiently
- Enhancing beauty, heritage and engagement with the natural environment
- Minimising waste
- Managing exposure to chemicals
- Enhancing biosecurity

There has been much debate that the because of increased car numbers associated with additional parking the proposal would not meet the goals for, “clean air for the population” and “mitigating & adapting to climate change.” However, for the reason given in the assessment of the proposed development against the requirements of policies JCS1, DM1 and DM28 the proposed development is considered to meet the requirements of the environmental policy, through being in a sustainable location and through seeing a reduction in the ratio of car parking spaces per the number of employees.

3.96. In addition, the proposed development is consistent with many of the “Key Policy Aims,” used to enact the targets, including:

- Reducing risks from flooding.
- Planting more trees to improve biodiversity and as a potential mitigation measure for climate change in appropriate locations
- Putting in place more sustainable drainage systems
- Supporting the community to make sustainable travel choices
- Working through the travel plan to support alternatives to car travel including promoting sustainable public transport and initiatives that utilise the growing cycling and pedestrian improvements within the County
- Encouraging sustainable travel on all new developments within the County,

The Environmental Policy seeks to embed an “environmental net gain” principle for development. As well as requiring an understanding that the consequences of the decisions the County Council takes can have global significances. The policy also seeks to ensure that each project the Council undertakes is assessed for the contribution it will make towards achieving the environmental targets.

3.97. Officer’s consider that while falling short of providing the environmental net gain that the Environmental Policy guidance document refers to, the proposal is broadly in accordance with the Environmental Policy which is a guide for development in the County. When exercising planning judgment, it should be recognised that the County Council’s Environmental Policy has not been subject to the same external scrutiny as the adopted development plan and the NPPF and is guidance to the Council only. Officers therefore recommend that the policies within the development plan and the NPPF should both carry more weight than the Environmental Policy in the assessment.

- 3.98. The following issues have been raised through the consultation:
- The proposal is not in alignment with the Norfolk County Council Environmental Policy. The Council has an ambitious and bold environmental policy to achieve net zero carbon emissions on its estates by 2030. This development neither supports alternatives to car travel, nor encourages sustainable travel, requirements of the Council's Environmental Policy.
 - Increasing car parking space is contrary to Council policy of encouraging travellers to use alternative forms of transport to the car.
 - The development is not in accordance with National Planning Policy Framework, Section 9 Promoting Sustainable Transport, Paragraph 102.
 - The Norwich Adopted Local Plan DM31 Car Parking and Servicing should be the relevant plan. The Parking Standards for Norfolk 2007 document should not carry any weight, as it is out of date.
- 3.99. Norwich City Council consider that in order for the development to meet the aims of Norwich Development Management policy DM1 and Joint Core Strategy policy JCS1 the proposal should comply with the requirements of Norwich Development Management policies DM28 in relation to sustainable travel and DM31 in relation to maximum parking standards. The parking standards are set out within appendix 3 of the plan.
- 3.100. Officers consider it correct that the sustainable credentials of the proposed development should be considered against the requirements of JCS1, DM1 and DM28 and that the number of spaces will affect the outcome. However, using policy DM31 and the parking standards in the way that the City Council has done is quite a simplistic and not in accordance with the NPPF. The use of the policy in this way also conflicts with the plans approach to the use of outdated policies.
- 3.101. Officers are satisfied that the proposed development would meet the sustainability requirements, subject to condition. Therefore, the proposed development is considered to be in accordance with Joint Core Strategy policies JCS1 & JCS6 and Norwich Development Management policies DM1 and DM28. The proposed development is not in accordance with the parking standard requirements of Norwich Development Management policy DM31. Officers advise that this policy should be considered as out of date until such time as it has been demonstrated that there is a clear and compelling justification that the adopted standards are necessary for managing the local road network, or for optimising the density of development in Norwich. Officers are of the view that paragraph 106 of the NPPF should carry more weight it is a more recent policy and it recommends maximum parking standards should only be used in certain circumstances which do not pertain in this case. The application is therefore in accordance with para 106 of the NPPF.

3.102. H – IMPACT ON HERITAGE ASSETS

The relevant policies are Joint Core Strategy policy JCS1 “Addressing climate change and protecting environmental assets,” and Norwich Development Management policies DM1 “Achieving and delivering sustainable development,” & DM9 “Safeguarding Norwich’s heritage.”

3.103. NPPF Chapter 16 “Conserving and enhancing the historic environment,” is also a material consideration.

3.104. Joint Core Strategy policy JCS1, seeks to conserve and enhance heritage assets through the protection of their settings.

3.105. Norwich Development Management policies DM1 and DM9 expect development proposals to protect and enhance heritage assets.

3.106. There following concerns have been raised by residents:

- Bracondale Hall falls within area to be built on. The underground remains of this building might be damaged and that future archaeological works compromised.
- The impact on the conservation area has not been considered.
- Decked car park through design causes harm to the setting of the Bracondale Conservation area. There’s no clear or convincing justification provided in the context of para 194 of the NPPF.
- The proposed deck also harms the relationship between the Conesford Drive townhouses and County Hall (which is a locally-listed building, although not part of the conservation area).

3.107. The application site is located beyond the Bracondale conservation area. The conservation area is characterised by different areas, the site is only visible from one of the areas (area F). Area F of the conservation area is characterised by 20th century planned developments and consists of a number of discreet pockets of 20th century housing including Conesford Drive, Churston Close and the Loaning. Many of the houses are generally two or three storey residential properties, built in the large gardens of properties that face Bracondale and date from the 1960s. There is a mix of architectural styles.

3.108. Views from the conservation area into the decked car park would be restricted to the rear gardens of residential properties and a pedestrian entrance at the Loaning. It is unlikely that the decked car park would be visible from elsewhere within the conservation area. The boundary between the application site and

the rear gardens of the properties in the conservation area already has an established mix of fencing and planting, additional planting. The applicant is proposing to further enhance the boundary treatment which would improve the relationship.

- 3.109. The NPPF sets out the weight to be given to the impact of development proposals in relation to heritage assets. In that respect, it is not considered that these proposals will result in substantial harm or the total loss of significance of a designated heritage asset (NPPF para 195).
- 3.110. There is a duty placed on the planning authority, in determining applications, to ensure that the character and appearance of the conservation area is either protected or enhanced. In respect of this, officers consider that the character of the area will change, but that this is not considered necessarily to be harmful, given the limited public viewpoints and boundary treatments being proposed. As a result, officers consider that the duty placed on the planning authority would be met if the proposals were to be approved.
- 3.111. Norwich City Council disagree with this opinion and consider that due to its significant size, height and somewhat functional appearance, a degree of harm would be caused to the setting of the Bracondale Conservation Area. The City Council also consider that the harm to the conservation area would be less than substantial in the context of guidance within the National Planning Policy Framework paragraph 196. The City Council consider the benefits of this proposal would not outweigh the harm and as such object to the proposal on this basis.
- 3.112. For completeness, whilst officers disagree with this opinion, if there were harm, officers consider there to be sufficient public benefits associated with the proposal to outweigh what would amount to negligible. These benefits include, the improved efficiency, service delivery and cost savings that the County Council would be able to deliver through relocating services and staff from Carrow House in to County Hall (and the potential re-use of Carrow House) and the closure of the satellite offices and relocation of services.
- 3.113. In addition, the Historic Environment Services Team (NCC) have commented that approximately one third of the proposed deck system could lay over the now vanished Bracondale Hall which is not designated but may be considered a heritage asset with archaeological. They have requested a condition requiring the applicant to submit an archaeological written scheme of investigation to be approved by the local planning authority in writing before

any development takes place within Development Area 3 of the application (Main Car Park).

- 3.114. Officers consider that the proposed development subject to condition would not result in harm to any heritage assets and would be in accordance with the requirements of Joint Core Strategy policy JCS1, Norwich Development Management policies DM1 & DM9 and the NPPF.
- 3.115. I – FLOOD RISK/GROUNDWATER/SURFACEWATER
- 3.116. The relevant policies are Joint Core Strategy policy JCS1 “Addressing climate change and protecting environmental assets,” Norwich Development Management policies DM5 Flooding and policy DM11 “Environmental hazards.
- 3.117. NPPF Chapter 14 “Meeting the challenge of climate change, flooding and coastal change,” is also a material consideration. As is Norfolk County Council’s Environmental Policy, which includes the goal of reducing the risk of harm from environmental hazards such as flooding is also a material consideration. In enacting this goal, the most relevant supporting key policy aim is through putting in place more sustainable drainage systems.
- 3.118. Joint Core Strategy policy JCS1, seeks to locate development to minimise flood risk, mitigate any risk through design and through implementing sustainable drainage.
- 3.119. Norwich Development Management policy DM5 requires all development proposals to be assessed and determined having regard to the need to manage and mitigate against flood risk from all sources. Proposals should also include mitigation measures to deal with surface water arising from development to minimise the risk of flooding on the development site and where possible reduce the risk, otherwise at least minimise the risk, within the surrounding area.
- 3.120. Norwich Development Management Policies Local Plan, policy DM11 “Environmental hazards,” requires development proposals falling within designated groundwater source protection zones or affecting a principal aquifer (as defined by the Environment Agency) to demonstrate that appropriate measures have been incorporated to minimise any risk of pollution to the water source.

- 3.121. The application is accompanied by a Flood Risk Assessment. According to the Environment Agency flood maps the application site lies within flood zone 1. Local policies and the NPPF seek to direct inappropriate development away from areas at risk. This area is not at risk of flooding so is therefore considered acceptable in this regard. Where development is acceptable it should not increase flood risk elsewhere.
- 3.122. The introduction of the decked car park does not result in an increase in impermeable area. Surface water runoff from the raised car park canopy will be directed to the existing drainage network currently serving the main County Hall car park, the applicant is not proposing to alter the existing drainage network. The Lead Local Flood Authority are satisfied with this approach subject to a condition requiring submission of final design details prior to commencement of the development.
- 3.123. In the annex car park, the applicant is proposing a mix of permeable surfacing and soakaways to manage the surface water. This approach is acceptable to the Lead Local Flood Authority subject to a condition requiring implementation prior to first use.
- 3.124. In the annex area there is also a deep bore soakaway, which currently accepts surface water from the car park. The Environment Agency initially raised a concern with the continued use of this, because the site is located above Principal & Secondary A Aquifers, a Water Framework Directive groundwater body and a Water Framework Directive drinking water protected area. It is also within Source Protection Zone 1, which is associated with multiple groundwater abstractions including a key drinking water supply for Norwich. The site is considered to be of very high sensitivity and could present potential pollutant linkages to controlled waters. The applicant through this application is proposing to direct all surface water away from the deep bore soakaway in to the smaller, shallower soakaways or permeable features. The Environment Agency are satisfied with this approach, subject to conditions regarding the restriction of additional drainage systems and managing contamination should any be encounter. Officers consider that the proposal represents a planning gain by virtue of the surface being directed away from the deep bore soakaway, into the smaller and shallower soakaways.
- 3.125. Officers therefore consider that the flood risk, the means of surface water disposal, the maintenance and management regime of the systems and the risk to groundwater are acceptable. It is also considered that the proposed development will not increase surface water flood risk on or off the site and will improve the control of pollution. The proposed development is considered to be acceptable and in accordance with Joint Core Strategy policy JCS1, Norwich Development Management policies DM5, the NPPF and Norfolk County Council's Environmental Policy.

3.126. J – OTHER CONSIDERATION

There have been comments received which question the need to increase the number of car parking spaces at County Hall. Particularly, given the current changes to working patterns that have been brought about by the Covid-19 restrictions. This has seen the number of employees parking their cars at County Hall, reduce significantly.

3.127. The applicant in response points out that the additional car parking is needed to accommodate more staff working at County Hall. The County Council is in the process of closing satellite offices throughout the County and re-locating staff to County Hall. The applicant explains that the closures of satellite offices will allow the Council to operate in a more efficient way and reduce the cost of delivering services. On the specific issue of whether the additional car parking would be needed if the Council changes its working behaviour with more staff working from home, the applicant states, that should this situation arise it would present further opportunities to close more satellite offices and re-locate more services in to County Hall, so the need will exist for the additional parking.

3.128. Officers are satisfied that the applicant has considered the issue of need and has demonstrated that there will be sufficient need to justify the additional car parking spaces being proposed.

3.129. **ENVIRONMENTAL IMPACT ASSESSMENT**

In accordance with the Town and Country Planning Environmental (Impact Assessment) Regulations 2017 the application was screened on receipt and re-screened at the determination stage and it is not considered that the development would have significant impacts on the environment. No Environmental Impact Assessment is therefore required

3.130. **RESPONSES TO REPRESENTATIONS RECEIVED**

The application was advertised by means of neighbour notification letters, site notices, and an advertisement in the Eastern Daily Press newspaper in accordance with statutory requirements.

3.131. The responses to the representations are set out under each of the relevant headings in Paragraphs 3.9. to 3.128. above. In addition, below is an Officer level response to those issues not previously covered:

| Issue Raised | Officer Response |
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| Public Health England review (2019) ask local governments to act to improve pollution levels. | The review says that everyone has a role to play in reducing pollution. Local authorities should coordinate |

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| | and lead action. Spatial planning intervention should be through mitigation (landscaping, surfacing) prevention (encouraging walking/cycling, road pricing congestion charge, driving restrictions, low emissions zones, traffic calming/speed limits, traffic displacement). The Council actively encourages walking and cycling, County Hall is in a sustainable location where further development should be directed. Officers consider that through the re-location of staff the proposal will lead to a reduction in car journeys and energy consumption. |
| 21% (614) of employees at county hall live within 2 miles of their office and could be encouraged not to drive. | It's not clear where the 21% figure is derived from, the Council encourages staff to use a variety of travel methods, with cycle access & parking, showers, bus stop, routes, park and ride etc. |
| Harford Bridges park and ride should be expanded. | This is not part of the application. |
| The car park is a waste of money. | Not a material consideration. |
| Invest in fast broadband rather than more roads. So that we can work well from home. | NCC are part funding Better Broadband for Norfolk (BBfN) which is a multi-million-pound partnership, transforming broadband speeds across the county |
| Create more parks, pedestrianised streets and cycle lanes, so people can enjoy their neighbourhoods. | Norfolk County Council, in partnership with Norwich City Council, Broadland District Council and South Norfolk Council, has made an application to the Department for Transport (DfT) as part of the Transforming Cities Fund through Transport for Norwich. To achieve the best possible balance between bus, walking and cycling schemes. There a number of parks within the area and the decked car park would prevent building on the County Campus green space. |
| Build carbon-free energy infrastructure and retrofit homes so they are carbon-free. | The applicant has submitted a sustainability statement which describes the approach taken to sustainability during the design |

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| | process and considers the extent to which the development proposals accord with the principles of sustainable development. |
| Train people up so they have the skills to flourish in a greener economy | Not a material consideration for this application. |
| More pollution and congestion through car use is exacerbating asthma and hence the susceptibility to pandemics such as Covid19 | The environmental health officer has not raised the same concern. |
| Car use still attracts higher subsidies than cycling. Put an end to prioritising combustion engines with favourable subsidies | It is not completely clear which subsidies are being referred too. The travel plan demonstrates that cycling as a travel option is promoted by the applicant. |
| Planning for a tram company using the existing BR infrastructure is impossible as planning expertise does not exist | Not a material consideration for this application. |
| Maybe now is the time to prioritise cycling to work before anything else. | Norfolk County Council promotes cycling for employees, cycle parking and facilities for cyclists are available at County Hall. |
| Pandering to the wishes of political expedients is not the new normal we expect after being shut in for yonks. | Not a material consideration for this application. |
| I should like to see an artist's impression of the view of the proposed car park from Churston Close to get a clearer impression of what the impact on my property is likely to be. | Artist's impressions provided. |
| What time do you suppose that the lights will be turned off (a) on normal working days, (b) when there is a football match, or (c) when the car park is used for other social occasions? I am assuming that I shall be able to see the lights from my house. | The lighting will match the existing and will be used in the same way at the same times as the existing. The Environmental Health Officer has considered the proposed lighting scheme and has not raised an objection subject to condition, restricting use of the decked car park after working hours. |
| The idea to ramp up parking charges for staff, not to speak of lucrative one-off receipts from future football games via an extra tier of unnecessary parking at county hall is unjustifiable and wrong. | It is not clear whether staff will be charged to park on the decked car park. Charging is not a material consideration for this application. |

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| <p>You employ less staff than 10 years ago and your needs as your departmental structures have not expanded but contracted under a fierce conservative Austerity program.</p> | <p>The applicant has successfully been able to demonstrate need, through the closure of satellite offices.</p> |
| <p>It might be an idea to make a case for training transport planners in all aspects of building an infrastructure for trams, as stand-alone and as co use of existing rail infrastructure, ideally in countries with expertise such as Holland Germany, as long as this is still possible under the existing EU framework and cooperative structures.</p> | <p>Officers have passed the advice to the Highways team.</p> |
| <p>How can the Council possibly see more staff car parking as a priority at a time of severe pressure on council budgets? Do council tax payers really want their money spent on this? Norfolk County Council has already made huge cuts to its budgets, with adverse impacts on services. Why not cut this parking proposal and spend the money instead on schools or other children's services?</p> | <p>These are not material considerations.</p> |
| <p>The application should be passed to an independent Planning Inspector to decide.</p> <p>Granting own permission impact on democracy?</p> | <p>Officers consider it entirely appropriate for the County Council to determine this application and not to refer it to the Secretary of State. Regulation 3 of the Town & Country Planning General Regulations 1992 states that subject to regulation 4, an application for planning permission by an interested planning authority to develop any land of that authority, or for development of any land by an interested planning authority or by an interested planning authority jointly with any other person, shall be determined by the authority concerned, unless the application is referred to the Secretary of State under section 77 of the 1990 Act for determination by him.</p> |

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| The area in front of County Hall, (visitor's parking), tennis courts or the annex are would be more appropriate. | The application does not propose these areas as an alternative. |
| Divert construction workers to build desperately needed homes | This is not a material consideration for the application. |
| The more space you make for cars (think M25) the more space you will need to add for cars. | The applicant has demonstrated that the need for additional parking does exist. |
| I am mindful of, the more than £30,000 (sic) million (revised to £30 million) wasted on the West Norfolk Incinerator when the County Council hastily misjudged the public mood, and the recent press reports of all the money lost by the City Council on misjudged and wholly inappropriate commercial property investments and building site developments. | This is a separate application with no planning relevance to this application. |
| County Council plea for funding to plug £20 million coronavirus hole. | Carries very little if any weight in the planning consideration. |
| It has not been established that there is inadequate parking provision on the site at present and re-provision to support those facilities relocating will result in duplication of parking at Carrow House etc. | Carrow house parking will no longer be available and the staff moving to County Hall creates the need. |
| Delay the decision for 12 months, so that better informed on the future need. | The applicant is aware of this suggestion and has not requested any delay. |
| Does the need still exist given the current changes to working patterns brought about by the Covid 19 pandemic? | The applicant has explained that should working patterns change with fewer people working in County Hall on a daily basis, this will give further opportunity to close more satellite offices. The need will still exist. |
| The assessment of need on which the proposal was based is out-of-date. The expected increase has not materialised. The planned relocation of staff would still not justify an expansion. | The applicant is satisfied that a need exists and has been able to demonstrate that expected increases have materialised. |

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| Spend the money on a pedestrian crossing on Bracondale instead of a car park. | This does not form part of the proposal. |
| The proposals appear to be based on out-of-date location plans that do not describe the properties adjacent to the eastern boundary of the Annex car park. | Officers consider that the base map used for the location and site plans show in sufficient detail the proposed development. |
| The pre-application consultation did not include all the residents. | The NNPF is clear that developers should be encouraged to engage at the pre-application stage, but this is not a requirement. |
| Security issues maintaining such an enlarged site. | County Hall has a 24-hour security and CCTV in operation. |
| <p><u>Financial Issues raised</u></p> <ul style="list-style-type: none"> ▪ The business case for the development is not available. ▪ Question whether the additional parking deck provides value for money, given the construction cost and the relatively few places it will add, given the places deleted by the support and access structures. ▪ The main car park was resurfaced just last summer and your proposal to now dig this up seems not only a monumental waste of taxpayers' money. ▪ Would the money not be better spent on facilitating ride sharing and transport to the park-and-ride facilities. ▪ Construction costs including piling. ▪ The cost of the development and the cost/benefit should be included in the application details? ▪ De-value neighbouring properties. ▪ Question the wisdom of going ahead with a £1.9 million construction project at, what will undoubtedly be, the expense of more pressing social need and more urgent infrastructure projects. | <p>Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. Officers consider that the financial issues raised are not material.</p> |

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| <ul style="list-style-type: none"> ▪ Spend the money on a pedestrian crossing on Bracondale instead of a car park. | |
| Potential for “creeping development?” | The application site is already developed. The application proposes a more efficient use of the land. |
| The Council should change the pay on foot car park or the tennis courts to staff parking. | This does not form part of the application. |
| The drawings are difficult to view online. | Officers are satisfied that the drawings are capable of being viewed online. |
| The architectural design team that drew up the plans are based in Luton and perhaps, therefore, are unaware of the nature and value of the neighbourhood. | Point noted, limited weight in the assessment. |
| Does the decked car park include disabled access? | There are 27 accessible parking spaces on the County Hall forecourt and the annex area. People in need of this type of parking are directed to these areas, which are more suitable by being nearer to the main buildings. |
| Has the structure been designed to prevent it providing a refuge for undesirable behaviour out of hours? | There is 24-hour security and CCTV in operation to prevent issues. |
| As the car park is not designed to the Secured by Design standards nor seeks Park Mark accreditation; this should be re-referred to the Architectural Liaison & Crime Prevention Officer for comment, as it was their recommendation. | Norfolk Police have not raised an objection and provide advice. Officers have discussed the issue of Park Mark award with Norfolk Police who consider that the development could achieve the award. The applicant is aware and has the contact details of the relevant officer, should they wish to apply for the award. |
| The Council should be making better use of the Park-and-Ride facility by extending service hours and running additional shuttle busses to its sites. | Advice passed on to the applicant. |
| The Annex car park should be closed on match days for environmental reasons. | Advice passed on to the applicant. |
| The Council should be reducing single occupancy trips. | Advice passed on to the applicant. |

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| An independent assessment of how Air Quality at the County Hall site would be affected would also be beneficial. There is an absence of any assessment of the impact from CO2 and other pollutants deriving from the additional vehicles. | There is no evidence to suggest that the scrutiny provided by the EHO is not sufficient for assessing the impacts upon Air Quality |
| Air pollution is estimated to cause approximately 40,000 excess deaths per year in the UK [reference: Reducing air pollution in the UK: Progress report 2018, Royal College of Physicians]. | Point noted and given limited weight in the assessment |
| The Council should be setting an example by working towards zero provision of workplace parking, not increasing existing provision. | Advice passed on to the applicant. |
| The Council should be leading the way in adopting sustainable transport solutions as the authority for strategic transport planning in Norfolk. | Advice passed on to the applicant. |
| No substantive assessment of how this proposal performs against sustainable transport policies. | The planning statement includes a policy assessment against the NPPF, Joint Core Strategy and Norwich Development Management Policies Local Plan. |
| County Hall is well served by buses and within cycling or walking distance of much of the city. It is time for the County Council to re-appraise its approach on this issue and start reducing parking provision rather than increasing it. | Advice passed on to the applicant. |
| On matchdays cars have their engines running and lights on, creating a lot of fumes and light pollution in Carshalton Road. | Point noted in the assessment and given limited weight in the assessment. The EHO has not raised this concern. |
| County Hall site is very close to an Air Quality Management Area (AQMA). Will this be affected? | The application site is not within the AQMA, therefore Norwich Development Management Policy DM11 Environmental Hazards does not apply. |
| Norfolk County Council's Interim Travel Plan explicitly states (page 5(sic)) the travel plan should aim to reduce car parking spaces by not less than 1% year on year for the duration of the travel plan. | The travel plan should aim to reduce car parking spaces by not less than 1% year on year for the duration of the travel plan subject to annual review. This is not a policy requirement. The application does not reduce the number of car |

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| | parking spaces, but it does per employee on the site. |
| There's nothing to demonstrate that alternatives to car use have been considered? | This is not a requirement. However, the site is in a sustainable location with many alternative options available. |
| The application represents a departure from the development plan in particular policy DM31. | For the reasons set out in the report officers consider that the proposal is not a departure. |
| <p>The proposal makes no provision for charging of electric vehicles, nor apparently for retrofitting such facilities in the future.</p> <p>Request that a condition is made to the effect that there should be no further net gain in parking spaces for Electric Vehicles, but they should replace the standard car parking spaces.</p> | The applicant explains that sustainable forms of transport and in particular the provision of electric car charging points at County Hall and other Council premises is being addressed under a separate specific project, outside of the remit of this project and application. The County Council are committed to providing charging points for its staff to lower carbon emissions. Appendix 3 of the Norwich Development Management sets out the standard, but this is outdated. Officers are satisfied with the applicant's response. |

3.132. **INTENTIONAL UNAUTHORISED DEVELOPMENT**

Following the Chief Planner's letter of 31 August 2015 to planning authorities, intentional unauthorised development is now a material consideration in the determination of all planning applications received after 31 August 2015. This is therefore capable of being a material consideration in the determination of this application.

3.133. **LOCAL FINANCE CONSIDERATIONS**

In accordance with Section 70(2) of the Town and Country Planning Act 1990 (as amended) the County planning authority must have regard to a local finance consideration as far as it is material. Section 74 of the 1990 Act defines a local finance consideration as a grant or other financial assistance that has been, that will or that could be provided to a relevant authority by a Minister of the Crown, or sums that a relevant authority has received, or will or could receive, in payment of the Community Infrastructure Levy.

3.134. In this instance it is not considered that there are local finance considerations material to this decision.

4. **Conclusion & Reasons for Decision**

- 4.1. There have been 53 third party representations from 37 responders, objecting to the development and an objection from Norwich City Council, raising concerns about the sustainability impacts, highway safety, amenity impacts including overlooking, noise and disturbance of vehicle movements, heritage impacts, arboricultural & biodiversity impacts. The design has been questioned as well as the need for the development.
- 4.2. There are no further objections raised by statutory consultees subject to suitably worded conditions being imposed on any grant of planning permission.
- 4.3. The application accords with the development plan and can be considered to be a sustainable form of development in line with the advice set out in the NPPF. The concerns raised by objectors can be addressed by condition, in order to make the development acceptable and there are no other material considerations that indicate that planning permission should not be permitted. Accordingly, conditional planning permission is recommended subject to the conditions set out below.

5. Alternative Options

- 5.1. Members of the Planning (Regulatory) Committee can only resolve to make a decision on the planning application before them whether this is to approve, refuse or defer the decision.

6. Financial Implications

- 6.1. The development has no financial implications from the Planning Regulatory perspective.

7. Resource Implications

- 7.1. **Staff:** The development has no staffing implications from the Planning Regulatory perspective.
- 7.2. **Property:** The development has no property implication from the Planning Regulatory perspective.
- 7.3. **IT:** The development has no IT implications from the Planning Regulatory perspective.

8. Other Implications

8.1. Legal Implications

There are no legal implications from the Planning Regulatory perspective.

8.2. Human Rights implications

The requirements of the Human Rights Act 1998 must be considered. Should permission not be granted Human Rights are not likely to apply on behalf of the applicant.

The human rights of the adjoining residents are engaged under Article 8, the right to respect for private and family life and Article 1 of the First Protocol, the right of enjoyment of property. A grant of planning permission may infringe those rights but they are qualified rights, that is that they can be balanced against the economic interests of the community as a whole and the human rights of other individuals. In making that balance it may also be taken into account that the amenity of local residents could be adequately safeguarded by conditions albeit with the exception of visual amenity. However, in this instance it is not considered that the human rights of adjoining residents would be infringed.

The human rights of the owners of the application site may be engaged under the First Protocol Article 1, that is the right to make use of their land. An approval of planning permission may infringe that right but the right is a qualified right and may be balanced against the need to protect the environment and the amenity of adjoining residents.

8.3. Equality Impact Assessment (EqIA)

The Council's planning functions are subject to equality impact assessments, including the process for identifying issues such as building accessibility.

The car park fills on a first come first serve basis. As a result of the proposals to increase the number of staff working at County Hall and despite this application proposing to increase the number of car parking spaces on site, there will be fewer spaces per employee. This means that there is potential for indirect discrimination to those employees with caring and child care roles, who have to arrive later in the working day. This situation could be improved through Norfolk County Council as an employer better managing parking arrangements.

8.4. Health and Safety implications (where appropriate)

There are no health and safety implications from a planning perspective.

8.5. Sustainability implications

This has been addressed in the sustainability section of the report above.

8.6. Any other implications

9. Risk Implications/Assessment

9.1. There are no risk issues from a planning perspective.

10. Select Committee comments

10.1. Not applicable.

11. Recommendations

11.1. That the Executive Director of Community and Environmental Services be authorised to:

- I. Grant planning permission in principle, subject to any call in by the Secretary of State.**
- II. Subject to any call in by the Secretary of State, grant planning permission subject to the conditions outlined below.**
- III. Discharge conditions where those detailed above require the submission and implementation of a scheme, or further details, either before development commences, or within a specified date of planning permission being granted.**
- IV. Delegate powers to officers to deal with any non-material amendments to the application that may be submitted.**

11.2. The development hereby permitted shall commence not later than three years from the date of this permission.

Reason: Imposed in accordance with Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

11.3. The development must be carried out in strict accordance with the application form, plans and documents.

- i. 201910-DAS, Design and Access Statement, rev B, dated 03.04.20.
- ii. 201910-HAS, Heritage and Archaeological Statement, rev A, dated 03.04.20.
- iii. 201910-CCS, Construction Consideration Statement, rev A, dated 13.12.19.
- iv. 201910-AAS, Arboricultural Impact Assessment, rev A, dated 20.12.19.
- v. 201910-SS, Sustainability Statement, rev A, dated 13.12.19.
- vi. 201910-TS, Transport Statement, rev A, dated 13.12.19.
- vii. 201910-PS, Planning Statement, rev A, dated 13.12.19.
- viii. 201910-FRA, Flood Risk Assessment, rev B, 28.02.20.
- ix. 201910-DS, Drainage Strategy, rev B, 10.04.20.
- x. 2019.232NWS, Ecology Report Norfolk County Hall. Final, rev A, 27.03.20.
- xi. 2019.232.1, County Hall Landscape Plan, rev A, 08.04.20.
- xii. 201910-100-001, Location Plan, rev A, 03.04.20.
- xiii. 201910-100-002, Site Plan, rev A, 03.04.20.
- xiv. 201910-101-001, Proposed Plan DA1, rev A, 03.04.20.
- xv. 201910-101-002, Proposed Sections DA1, rev A, 03.04.20.
- xvi. 201910-101-003, Proposed Section DA1, rev A, 03.04.20.
- xvii. 201910-101-004, Proposed Plan DA2, rev A, 03.04.20.

- xviii. 201910-101-005, Proposed Sections DA2, rev A, 03.04.20.
- xix. 201910-101-006, Proposed Plan DA3, rev A, 03.04.20.
- xx. 201910-101-007, Proposed Elevations DA3, rev A, 03.04.20.
- xxi. 201910-101-008, Artists Impression DA3, rev A, 03.04.20.
- xxii. 201910-101-009, Artists Impression DA3, rev A, 03.04.20.
- xxiii. 201910-101-010, Artists Impression DA3, rev A, 03.04.20.
- xxiv. 201910-120-001, DA2 Exceedance Flooding Plan, rev A, 13.04.20.
- xxv. 201910-C510-001, Proposed Drainage Plan DA2, rev A, 28.02.20.
- xxvi. 201910-C510-002, Drainage Details DA2, rev A, 28.02.20.
- xxvii. 201910-C700-001, Pavement Details DA1, rev A, 03.04.20.
- xviii. 201910-C700-002, Pavement Details, rev A, 03.04.20.
- xxix. 201910-C700-003, Pavement Details DA2, rev A, 03.04.20.
- xxx. 201910-C1300-001, Proposed lighting scheme DA1, rev A, 03.04.20.
- xxxi. 201910-C1300-002, Proposed lighting scheme DA2, rev A, 03.04.20.
- xxxii. 201910-C2500-001, Acoustic fence, rev A, 03.04.20.
- xxiii. 201910-C3000-001, Arboricultural plan DA1, rev A, 03.04.20.
- xxiv. 201910-C3000-002, Arboricultural plan DA3, rev A, 03.04.20.
- xxxv. 201910-AI-002, DA3 proposed looking north, rev A, 09.04.20.
- xxvi. 201910-AI-004, DA3 proposed looking east, rev A, 09.04.20.
- xxxvii. 201910-AI-006, DA3 proposed looking south, rev A, 09.04.20.
- xviii. 201910-AI-008, DA3 proposed looking west, rev A, 09.04.20.
- xxix. 201910-AI-010, DA3 proposed view Conesford Drive, rev A, 09.04.20.
- xl. 201910-AI-012, DA3 proposed view Conesford Drive, rev A, 09.04.20.
- xli. 201910-AI-014, DA3 proposed view Conesford Drive, rev A, 09.04.20.
- xlii. 201910-ATC, Additional Transport Correspondence, rev A, 20.04.20.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 11.4. Prior to the first use, the surface water drainage system shall be constructed in accordance with the submitted FRA (Flood Risk Assessment; Norwich County Hall Car Park, ICARUS Consulting Limited, Project ref 201910, Document ref 201910-B, Revision B, Dated February 2020 and the revised drainage strategy (Surface Water Drainage Strategy; 201910 Norwich County Hall Car Park, ICARUS Consulting Limited, Document ref 201910-B, Revision B, Dated 10 April 2020) together with the Soakaway design calculations for soakaways DA2CA1 - DA2CA9 (ICARUS Consulting limited, Project ref 201910-NCC, Dated February 2020). The approved scheme will be implemented prior to the first use of the development and maintained for the lifetime of the development.

Reason: To prevent flooding in accordance with Norwich Development Management Policies Local Plan DM5 and the National Planning Policy Framework paragraph 163,165 and 170.

11.5. Prior to the commencement of development in development area 3, detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed in writing with the Local Planning Authority.

- I. Detailed designs of the raised car park deck located in Development Area 3 are submitted. The proposals will illustrate how surface water runoff from this feature will be sustainably managed and disposed of without increasing the risk of flooding to the existing ground level car park or inhibit its general usage.

Reason: To prevent flooding in accordance with Norwich Development Management Policies Local Plan policy DM5 and the National Planning Policy Framework paragraph 163, 165 and 170.

11.6. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect and prevent the pollution of the water environment (particularly the Secondary A and Principal aquifers, Source Protection Zone 1, nearby abstractions and EU Water Framework Directive Drinking Water Protected Area), in accordance with Norwich Development Management Policies Local Plan policy DM11.

11.7. No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To protect and prevent the pollution of the water environment (particularly the Secondary A and Principal aquifers, Source Protection Zone 1, nearby abstractions and EU Water Framework Directive Drinking Water Protected Area), in accordance with Norwich Development Management Policies Local Plan policy DM11.

- 11.8. The use of the upper deck in Development Area 3 of the application (Main Car Park) shall be restricted from new access to vehicles after 17:00 on any day and on any Sunday or bank holiday by the use of a physical barrier.

Reason: To protect amenity in accordance with Norwich Development Management Policies Local Plan policy DM2.

- 11.9. Prior to installation, precise details of the oak effect vertical UPVC cladding being used to clad the upper section of the deck, shall be submitted to, and agreed in writing by, the County Planning Authority. The development shall then be constructed and retained in accordance with the approved details.

Reason: To ensure the satisfactory appearance of the development, in accordance with policy DM3 of the Norwich Development Management Policies Local Plan.

- 11.10. During the first year of use an approved Full Travel Plan based on the Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. The approved Full Travel Plan shall be implemented in accordance with the timetable and targets contained therein and shall continue to be implemented as long as any part of the development is occupied/in use subject to approved modifications agreed by the County Planning Authority in consultation with the Highway Authority as part of the annual review.

Reason: To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment in accordance with Norwich Development Management Policies Local Plan policy DM28.

- 11.11. Development shall not commence until a scheme detailing the provision of temporary replacement parking for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason: To ensure adequate off-street parking during construction in the interests of highway safety Norwich Development Management Policies Local Plan policy DM30. This needs to be a pre-commencement condition as it deals with the construction period of the development.

Background Papers

Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted Jan. 2014 (JCS).

<https://www.greaternorwichgrowth.org.uk/planning/joint-core-strategy/>

Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan).

https://www.norwich.gov.uk/info/20199/local_plan

The National Planning Policy Framework (NPPF) (2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf?_ga=2.81687703.1498971390.1566921834-1965140127.1559835065

Planning Practice Guidance (2014)

<https://www.gov.uk/government/collections/planning-practice-guidance>

Norfolk County Council, Environmental Policy

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/natural-environment-policies/environmental-policy>

Officer Contact

If you have any questions about matters contained in this paper or want to see copies of any assessments, equality impact assessment, please get in touch with:

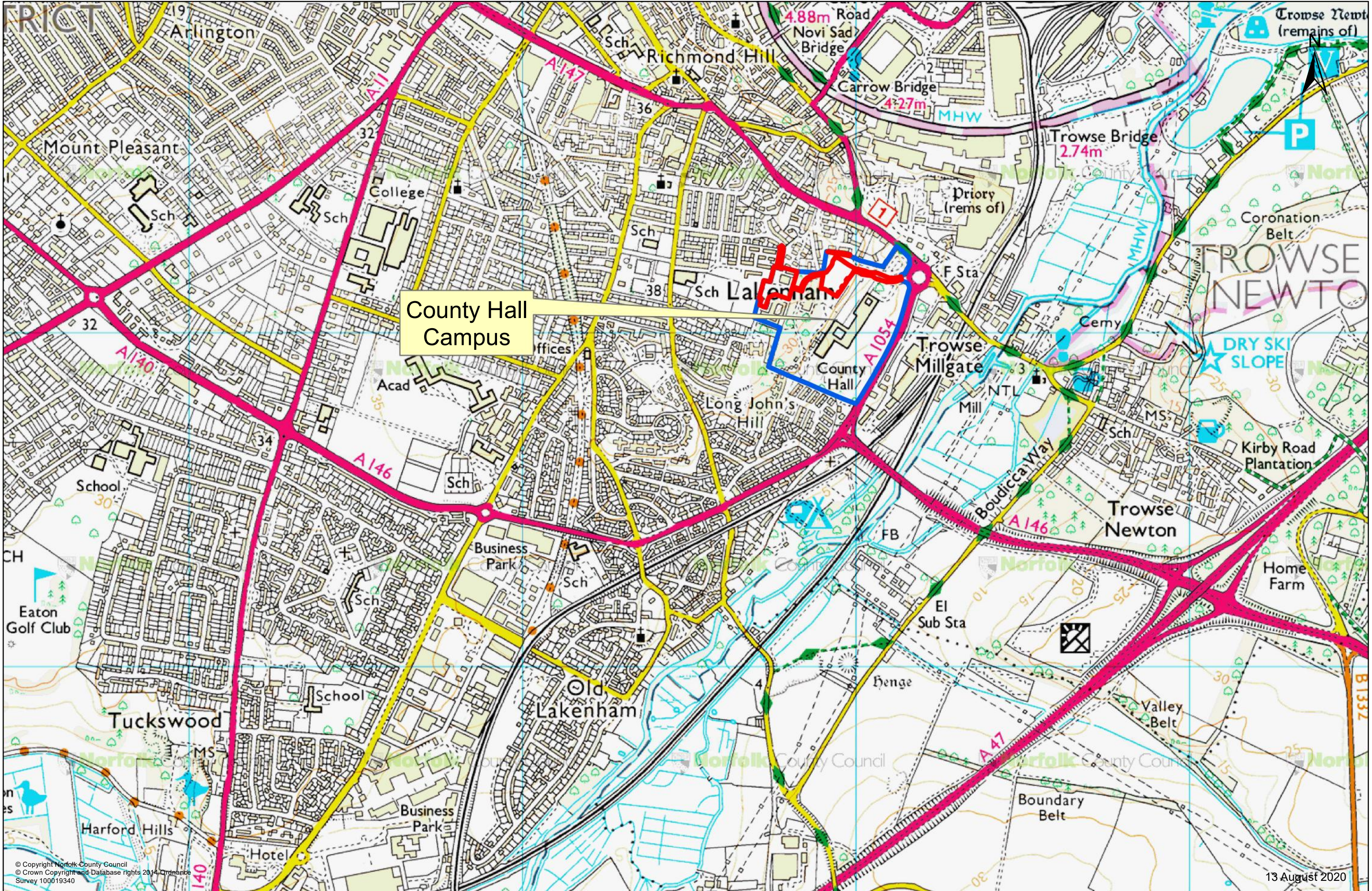
Officer name: Neil Campbell

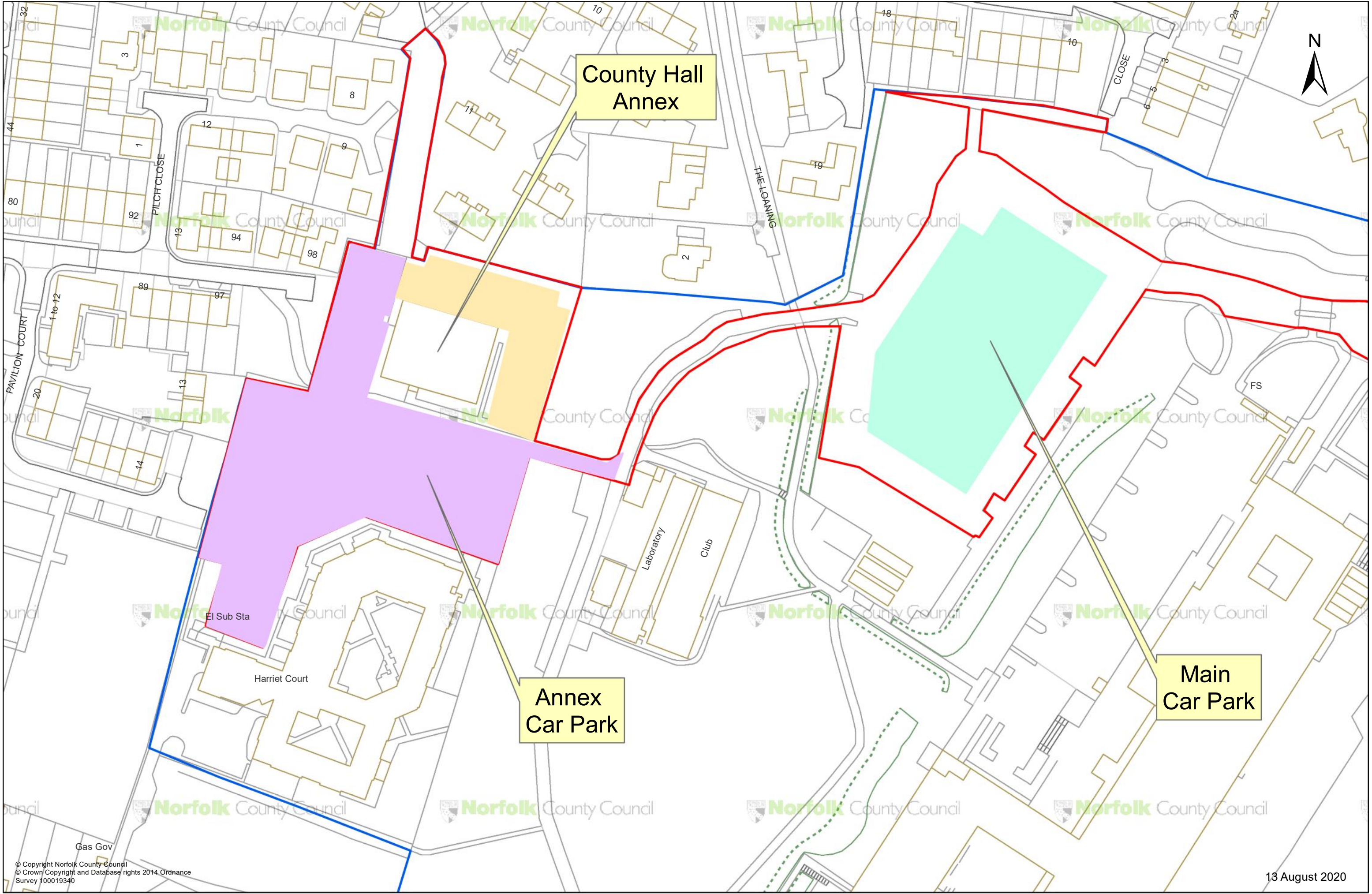
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County Hall Car Park Site Plan



13 August 2020

