

## **Aylsham Town Council: Response to planning application 20222089**

### **Aylsham Town Council objects to this application.**

**The Town Council** requests that BDC urgently seeks a withdrawal/deferment of this application for the reasons given below.

### **Reasons why the planning application should not be put before the Planning Committee.**

**The Local Planning Authority is asked to wait until the outcome of the Local Plan examination by the Planning Inspectorate, which will include a decision on the justification of a second site.**

The Planning Inspector may or may not support the GNLP in regard to the Norwich Road site.

The Town Council acknowledges that there is a possibility that Broadland District Council could put the site forward as a 'windfall site' thus going against the independent adjudication from the Planning Inspectorate. However, a windfall site normally only applies to small or medium sized developments.

If the Local Planning Authority considers this application prior to the local plan being determined by the Planning Inspectorate, it undermines the consultation element of the local plan process and runs contrary to the intended position agreed at the Regulation 18 stage of the process.

Paragraph 49 of the NPPF makes it clear that an argument can be made that an application such as this should be considered premature, as "the development is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan and; the emerging plan is at an advanced stage but is not yet part of the development plan for the area".

Aylsham Town Council considers Paragraph 49 to be wholly applicable in these circumstances and this **represents the main principle of our argument. i.e. This application is entirely premature and should await the outcome of the Local Plan Examination.**

In the event that **the Local Planning Authority proceed to determine the application at this stage, the Town Council OBJECTS for the following reasons:**

## Reasons why the Planning Committee should reject planning application 2022289

### 1. The number of homes is exceeding the total that the GNLP originally put forward.

Regulation 18 deemed that Aylsham be allocated 250 new homes. This was planned for the Burgh Road site plus a reallocated new primary school on the site. This position was arrived at following appropriate consultation

Totally unexpectedly the Regulation 19 outcome (which did not follow any consultation) stated that a second site is required. The original plan was for 300 homes on the Norwich Road site. The site is now planned to accommodate 255 homes and a 90-unit extra care/independent living scheme.

The number of housing units have therefore changed as follows:

Units	Regulation 18	Regulation 18 and 19 combined	Current Application February 2023
Burgh Road site	250	250	250
Norwich Road site – housing	0	300	255
Norwich Road site – extra care / independent living scheme	0	0	90
TOTAL	250	550	595

Regulation 18 plus Regulation 19 has set an allocation of 505 new homes on two sites plus a 90 extra care/independent living unit making a total of 595 residential units. There is confusion concerning the number of proposed homes as the GNLP policy document states that “land at Norwich Road Aylsham ... is allocated for residential development. The site is to accommodate at least 255 homes. The mix of uses is to **include** a 90-bed care unit/extra care housing, and 0.25ha for community use” This confusion is added to by the footnote in the GNLP considering that a 90-bed assisted living complex is counted as 45 new homes. The argument put forward in the appendix lacks logic as people moving out of a home then make that one available. A 90-bed assisted living complex is a considerable strain on the physical and social infrastructure of the Town.

This allocation of 595 new homes/residential units to include both sites has happened without consultation. The infrastructure will not be able to support this increase in housing.

## 2. Affordable Homes allocation on the Norwich Road Site

The GNL target for affordable housing is 33%.

The Norwich Road site application has 33% of affordable homes – which is 114 housing units. In the application this is broken down as follows:

Affordable Housing Units	Houses	Flats	Total
Social/Affordable/ Intermediate - rent	17	64	81
Affordable Home Ownership	7	26	33
TOTAL	24	90	114

There are 24 affordable homes on the main housing site, which is only 9.5% of the 255 homes. The location of the affordable housing does not comply with the nationally accepted concept as the homes are in two blocks of 16 and 8, rather than being tenure blind and spread throughout the development.

The plan is a missed opportunity in not addressing housing need in Aylsham. The greatest need for social housing in Aylsham is for the age group 20 to 40 rather than those over 55. Aylsham has a low percentage of affordable homes available for working people and a significantly lower percentage than twenty years ago.

The assisted living complex has 90 homes all of which are classified as affordable. There are 26 homes that are available for shared ownership but to qualify to move into one of these homes you cannot be a current home owner. This would mean that the large majority of residents over 55 who live in Aylsham and the surrounding villages would not qualify for this complex.

It would appear that these decisions in regard to both affordable homes allocation and the assisted living complex have not been made with knowledge of Aylsham and are looking to provide homes for people in other areas such as Broadland, Norwich or South Norfolk. Point 6.14 of housing need in the Aylsham Neighbourhood Plan highlights the needs in Aylsham.

## 3. Assisted Living Complex

There are a number of issues with the extra care/independent living scheme that has been put forward in the plan for Norwich Road.

The Town Council did point out that it would be preferable if the site mirrored the main entrance into Aylsham on the Western side of Norwich Road

The proposal to place a dominant large three storey building at the entrance into the town is totally out of keeping with the rest of the area and therefore contrary to Local Plan and Neighbourhood Plan policies. Aylsham has very few three storey buildings.

The plans for the assisted living complex do not comply with Policy 2 of the Aylsham Neighbourhood Plan. Point 1 states that 'development should be designed to preserve and enhance Aylsham by

recognising and reinforcing the distinct local character in relation to scale, density, spacing, layout orientation, features and material of buildings.

The overbearing nature of the assisted living building will create problems for the people who live in Copeman Road and on Norwich Road. The complex is an example of over development and is out of keeping with existing buildings in Aylsham. If the GNLP felt there was a need for homes for people aged over 55, they should have discussed this matter with the Town Council, in line with the Statement of Community Involvement.

#### **4. Refusal of the application in February 2013**

In February 2013 the application for building on the Norwich Road site was rejected (planning reference 2012111). The reason for this was the fact that the Anglian Water sewage system would not be able to cope with the increased demand and that the extra homes would have an adverse impact on the town as significant development had already taken place.

The Town Council has no confidence that this position has been changed and therefore cites the inadequate foul water infrastructure as a major reason for objection.

#### **5. Planning Obligation**

There should be a signed Planning Obligation Section 106 agreement to determine that the relocated new primary school will be built at the proposed Burgh Road site, **before** any decision is made on the proposed Norwich Road site. Until the S106 is signed the community of Aylsham have no guarantee that the school will be built at the proposed Burgh Road site. Such an agreement, at the decision-making stage, is crucial to ensure that the development is acceptable in planning terms; is directly related to the proposed development; and is fairly and reasonably related in scale and kind to the development. (NPPF Paragraph 57).

#### **6. Proposed changes to National Planning Policy**

**The Government regulations have changed since Regulation 19 was put forward.**

At the time of the Regulation 19 stage the current Government guidance was for LPA's to provide for a five-year housing land supply and a 20% buffer.

It was for this reason that the second site of Norwich Road was allocated to Aylsham without appropriate statutory consultation.

Of relevance here are a number of important points recently raised by the Secretary of State: "It will be up to local authorities, working with their communities, to determine how many houses can actually be built, taking into account what should be protected in each area."

"My changes will....give local communities a greater say in what is built in their neighbourhood."

Mr Gove's clear intentions and approach directed at Local Planning Authorities are summarised as "These reforms will....(promote) development that is beautiful, that comes with the right

infrastructure, that is done democratically with local communities, rather than to them, that protects our environment, and that leaves us with better neighbourhoods' than before".

This development does not have the support of the local community, the infrastructure which includes water, sewage system, education and medical provision will not be able to cope.

The proposed changes to the NPPF will introduce many new requirements that are very different from the White Paper but there has been no appreciation of this fact. There is a need to wait for the LURB to become law before any decision should be made regarding the Norwich Road site. In fact, numerous Local Planning Authorities have paused progress on their Local Plans as a result of the NPPF consultation, to enable them to take stock and reassess their local housing need.

## **7. Design**

The site represents a prominent "gateway" to the town of Aylsham, which the current proposed layout and design completely fails to acknowledge. The part of the site where the 255 houses are proposed suffers from overcrowding and a lack of space between houses or groups of houses. This is partly due to the large area that the assisted living complex takes up, but also the large attenuation area, which is needed owing to the poor drainage of much of the site. Part of the site includes the area for a transport hub and takes up .25 hectares of land, but unfortunately this is not a large enough area for a transport hub and can only be used as a car park. It is the view of the Town Council, supported by made policies, that the site is unsuitable for this number of houses and the 90-bed assisted living complex.

It would seem that there needs to be consideration as to whether the site is unsuitable for this number of houses and the 90-bed assisted living complex.

It is clear that the proposal is not in accordance with the development plan policies within the Aylsham Neighbourhood Plan. -NP Policy 2 "Improving the design of development" recognises that development should preserve and enhance Aylsham by recognising and reinforcing distinct local character in relation to height, scale, density, layout orientation, features and materials of buildings. Rather than following these points in the Neighbourhood Plan the applicant has totally ignored these key points to help a new development integrate appropriately within Aylsham. The affordable assisted living project also highlights a problem of the lack of bungalows. There will be a demonstrable demand for residents in Aylsham and the surrounding villages to downscale to a single storey building, as being homeowners, they will not be able to have a place in the assisted living complex. Bungalows would also meet NP Policy 2 and be more suitable for homes backing onto Copeman Road. There is also an absence of point ii of policy 2, that design should enhance safety and security. The Town Council's concerns are supported by the information from the Designing Out Crime Officer of Norfolk Constabulary.

NP Policy 1 "Improving Housing Design" of the Aylsham Neighbourhood Plan emphasises the need for the designs to be of a high standard and be mindful of how residents will live in their homes. This important adopted policy is supported by key points such as garages should be provided within the curtilage of the home, and not in separate blocks. There is also no mention of electric charging points, a key point in both Central Government policy and the Neighbourhood Plan. If any new homes do not have accessible rear gardens, this would fail to allow direct access, via external means, rather than through the house. There also appear to be homes to rear gardens that fail to allow

direct access, via external means, rather than through the house. There is no evidence that there will be accessible screened storage space for refuse and recycling within each property's curtilage.

NP Policy 3 proposes that properties should incorporate the principles of dementia friendly communities. It may well be that the assisted living complex will provide this, but there needs to be evidence that the area of 255 houses should also support this principle.

It is disappointing to see that affordable housing is not tenure blind. The 24 homes on the main housing site are in just two areas, 8 to the North of the site and 16 in the South, very near to the A140.

Unfortunately, the Norwich Road site planning application presents no evidence that it is aware of the issue of designing homes that incorporate all the new Government Policies involving heating of homes, charging points for electric cars, availability of the option of solar panels and other means to support new green energy policies.

Policy 5 of the GNLP states that at least 5% of plots on residential proposals of dwellings or more should provide service serviced self/custom-plots. This is also in the Aylsham Neighbourhood Plan, Policy 2 point iii. The application is therefore contrary to the adopted policy of the Neighbourhood Plan and the emerging policy within the Local Plan.

Perhaps the most worrying failure of the design reflects the concern in Policy 1, of the Aylsham Neighbourhood Plan, where it states that new homes must have a final sewage solution, (not a temporary one) and from Policy 2 which requires a connection to the public sewage network with a sufficient capacity to accommodate the development and no dwellings are occupied until that capacity is available. This issue is considered in more detail at point 13 below.

## **8. Transport and Traffic**

The possibility of two housing development sites being constructed at the same time would cause traffic congestion, environmental problems and a strain on the infrastructure. The application does not include an appropriate traffic assessment in the eventuality that both development sites were operational at the same time, nor the cumulative impact of two completed sites.

As it has been noted above Aylsham Town Council has been supporting the idea of a transport hub near the A140 and the Aylsham Transport Strategy group has been investigating the options available. However, .25ha of land is insufficient for a transport hub and only suitable for a car park. There are very few benefits for Aylsham with this development and it had been hoped that the transport hub would have been a benefit, but this size is of very limited.

There are proposals for different footpaths, which appear at first glance to be beneficial to the Town. However, by having an exit into Buxton Road for pedestrians it will create an issue with the pedestrians entering a road that has no pavements and is busy at certain times of the day. The path planned to the Town on the East side of the Norwich Road being wide enough for a cycle path and pedestrians again appears a good idea. However, it has been stated that there would not be a line down the middle to separate the two parts of the path. The division of the path is normal practise in Norwich and most other cities and towns. In addition, there are concerns that some of the diagrams seem to indicate that to facilitate the widened path the Norwich Road may be effectively moved a metre and half to the West. This would have an impact on the green area on the West of the Norwich Road.

The background papers from Canham Consulting indicate that the development would not have a significant impact on road traffic. However, the decision to use Buxton Road levels of likely vehicle trip rates to ascertain likely traffic to the assisted living complex has little validity as Buxton Road is within easy walking of shops, is a dead end and mainly lived in by older residents. The 2021 to 2026 traffic growth rates were applied to the 2021 base trips using the National Trip Model (NTM) growth factors were used by Canham Consulting.

However, the base level for 2021 has a fatal flaw of occurring during national lockdowns due to Covid and therefore has a much lower figure of traffic movements in 2023. Canham Consulting give clear advice that “The analysis completed through PICADY and ARCADY, identified that the current and proposed changes to the local highway network has ample capacity to accommodate the proposed site development including both the 255 dwellings and the 90 bed-care unit.” However, their data is flawed due to this covered a period of National lockdowns. The count was taken four days after the rule of six was introduced for social gatherings and many people were working from home. This failure to consider reliable data means that limited or no significant weight should be given to the conclusions on Page 22.

The Traffic Consultancy employed by Aylsham Town Council produced data in 2022, which was not during a lockdown that had significantly different results. The Local Planning Authority and the County Highways Authority is respectfully asked to give major consideration to this reliable data.

The possibility of the planned development at Burgh Road and Vattenfall pipelines being built will create significant traffic congestion and highway safety issues even without a second development. The increased traffic will also have a direct impact of the environment as noted in the Aylsham Neighbourhood Plan.

## **9. Open Spaces and Boundaries**

There is concern over the boundary of the site to the A140. It is unclear the degree of buffering to limit the road noise. The environmental quality team highlight the lack of a buffer to mitigate against noise. However, it should not be a wall, but a raised area with hedges, fencing or additional glazing to the dwellings. This is exacerbated by the close proximity of the houses to the boundary.

The site does suffer from areas of high-density housing, whilst having two large areas of open space, one of which will create problems for public access due to the attenuation pond and the nature of the ground. At present during periods of heavy rainfall there is run off from the field across the site and into the pond in Grade 2 listed Diggens Farm. It is proposed to use infiltration techniques with soakage into the ground, but the permeability of the soil makes this very difficult. It is certain that this development will have an adverse impact on the biodiversity features of the wildlife pond in Diggens Farm.

There is a lack of small open spaces through the site, which previous developments have benefitted from. It would be beneficial for wildlife and wellbeing of the residents as would a green corridor through the site to link with open spaces beyond the site.

It is disappointing that the plan is contrary to Policy 5 of the Neighbourhood Plan, accessibility and biodiversity. “New developments should maximise the opportunities to enhance connectivity and through the connection to existing footpaths and cycleways, encourage links to the wider parish and countryside.” “Green infrastructure should be provided as part of any new development improving

biodiversity and connections with existing open spaces.” This site creates more problems for the environment, and gives no evidence of net biodiversity gain.

## **10. Climate Issues**

Climate concerns are a major part of the Neighbourhood Plan and Aylsham Town Council are one of the few communities in Broadland to declare a climate emergency. This led to the Town setting up a climate emergency group. It therefore was disappointed to read the planning application for Norwich Road that promised awareness of climate issues, but instead has created many problems.

The addition of another 345 dwellings, (it is not 300 dwellings as stated in some documents) is in itself damaging to the environment and to an ancient town without the infrastructure to cope. If the development is built there will be a significant increase in the volume of traffic travelling through the town. Many streets are narrow and the layout of the town dates from Medieval times.

There is concern of the extensive pollution from noise, dust and significant traffic in the construction of the site. Once the site is built there will be a notable increase in traffic between 300 and 500 new vehicles from this site alone.

The proximity of the proposed site to Grade 2 listed Diggens Farm will cause environmental damage to a wildlife pond and the wildlife in that area. The Wild Frontier Ecology group did test for newts in the very hot and dry summer of 2021, but the pond was dry. In 2022 when water was present there were newts in the pond. There are also concerns on the impact the development will have on bats, which are regularly seen on the site. To be fully compliant with policy the site should be subject to an up to date biodiversity study.

There is no evidence in these plans in regard to electricity charging points and the methods of heating. There is also no mention of swift boxes, bee bricks and awareness of the need for hedgehogs to move through the gardens.

There will be severe damage to the environment through the cumulative impact of two developments in addition to the work Vattenfall will be undertaking. There will be a significant impact on air, noise and light pollution.

The proposal attempts to argue that the development is good for the environment, but even simple matters such as a green corridor are not present.

There will be a judicial review of the link to the A47 that should reach a conclusion this summer, it may involve significant changes to any developments. Central to this argument is the impact on chalk streams and the issues around waste water indicate that there already significant overflow from the Water Recycling Centre into the River Bure

## **11. Archaeological Assessment**

In May 2012 NPS prepared the archaeology report for the previous refused application. The report had been prepared for outline planning permission. Normally this happens before developers apply for detailed permission.

There is no evidence of archaeological finds on the proposed site from the desktop study, but the proposed site is surrounded by areas of interest, especially for prehistoric and Roman evidence. The



Town Council is concerned that the report has not mentioned the extensive work that takes place at Woodgate each summer where they have found evidence not just of a Roman settlement, but also iron age artifacts. It is certain that this site had links with Brampton, which would indicate that it is likely there would be a connection between the two sites near the Norwich Road site.

The NPS archaeology report considers that field surveys (and other non-intrusive surveys) should be undertaken in advance of any construction. Any evidence of earlier land use should then be assessed and investigated by responsible archaeological contractors.

Should the proposed Phase One (Sewage and Roads) of the project go ahead it would be appropriate that an archaeologist be employed to check any trenches for archaeological evidence.

The NPS archaeology report suggests “such surveys to be the subject of a condition placed on the granting of outline planning permission.” (7.0, p28) As no outline permission has been granted, it is appropriate that prior to determination the LPA should be presented with a detailed archaeological assessment.

We also note that Norfolk County Council Historic Environment Officer informed Archaeological Solutions in an email (dated 16 Sept 2019) they...

“...consider that a post-determination programme of archaeological mitigatory works would be appropriate, secured through conditions...in the usual way”.

This comment is based on the results of the Desk Based Assessment undertaken in May 2012 and the magnetometer Survey undertaken in November 2012. This also backs up the view of the Town Council as detailed above.

## **12. Assessment of costs and benefits to Aylsham**

In the Design and Planning section of the planning application point 4.31 it states that “the proposed development will bring significant socio-economic benefits in meeting housing needs.” In the information sent to the Planning Inspectorate the Town Council highlighted that the GNLP’s assessment of housing needs in Aylsham were unsound. A judgement on this issue will be given later in the year.

In determining the socio-economic benefits there will be some benefits to the wider area with employment opportunities and greater trade for the businesses in the Town.

However, there is considerable concern in regard to social costs due to the strain on the infrastructure. The problem of education at primary school level will be met by the school planned for the Burgh Road site. However, that does have to be built before planning permission is given to the Norwich Road site.

The evidence put forward by Canham Consulting implies that the road network would cope with the increased traffic. However, the statistical basis of traffic count occurred during the Autumn lockdown of 2021 and is therefore not sound. There will be an increase in traffic throughout the town, Norwich Road and Burgh Road will need improvement to cope with the increased volume of traffic. This may lead to pedestrian crossings and traffic lights in the narrow areas of both roads. These are issues that the highways department has not highlighted.

The influx of approximately 1,000 more residents of Aylsham from the Norwich Road development will put unsustainable pressure on the local health service. At present both doctor’s surgeries have

stated that they cannot cope with an additional 595 new dwellings in Aylsham, particularly 90 of which are from an assisted living complex.

The planning application states that Anglian Water has the capacity to support a further 595 dwellings, but the present evidence as seen below indicates that they are not coping with the recent housing developments and as seen below these problems indicate that the infrastructure of Aylsham is not, at present, able to cope with two new developments of 595 dwellings.

### **13 Nutrient neutrality.**

This application should be assessed against the conservation objectives for the protected habitats of the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site concerning nutrient pollution in accordance with the Conservation of Species and Habitats Regulations 2017 (as amended) (Habitats Regulations).

The Habitat Regulations require Local Planning Authorities to ensure that new development does not cause adverse impacts to the integrity of protected habitats such as the River Wensum or the Broads prior to granting planning permission.

The development proposed involves the creation of additional overnight accommodation and the site is located within the Broads SAC catchment area. The application submission does not include any supporting information, nor assessment and as such, it has not been demonstrated that nutrient neutrality with regard to its nitrate and phosphate impact on The Broads SAC will not occur.

The proposal therefore fails to meet the requirements of the Conservation of Species and Habitats Regulations 2017 (as amended) and paragraphs 174, 179, 180 and 181 of the NPPF (2021). Broadland District Council, along with all other Norfolk Local Authorities have adopted the Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMs) meaning any development where additional recreational impact is likely to be generated, will be required to pay a one-off tariff of £185.93 per dwelling / unit to go towards the Norfolk Recreation Impact Avoidance Mitigation Strategy.

This is because evidence from the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation strategy shows that schemes which create additional recreational impact (in combination with other development), in the zone of influence of European Protected wildlife site, will likely have a significant effect through recreation impact i.e., visiting sites for recreational purposes. On this basis, a Unilateral Undertaking will be required to ensure payment of the GIRAMs. The Town Council has not been made aware of such a Unilateral Undertaking.

### **14. Water Issues**

The drainage issue across the site is not acceptable and the evidence that Anglian Water have solved the problems of overflowing pipes at present is not sustainable to any careful examination. There is a constant issue of foul smells in the area. On Page 52 the Flood Risk and Drainage Strategy indicates that the ground gases are only at medium level already which indicate there are existing problems effecting people's quality of life and health. There is a major problem in this area in that Anglian Water state that there is capacity or above capacity without any development.

At present the development does not meet Policy 9 flood risk of the Aylsham Neighbourhood Plan. There are many aspects of the development plans that lead the Town Council and the residents of the Town to consider that these problems have not been properly investigated.

On Page 20 the Flood Risk and Drainage Strategy indicates there will need to be a large pumping station to service the site, which is unusual in many developments and that there is potential for adding to the problems that are already in this area of the Town, including Norwich Road.

An independent report by Create Consulting Engineers Ltd in 2018 found that that the Aylsham Water Recycling Company had capacity for treating waste from only 100 extra dwellings. No significant work has taken place on AWRC since that date and little since 2013 when Broadland rejected a planning application for the Norwich Road site. The reason for this was the fact that the Anglian Water sewage system would not be able to cope with the increased demand.

On Page 20 of the Flood Risk and Drainage Strategy it states that “Aylsham Water Recycling Centre currently has capacity to treat the flows from the development site.” However, it would seem that the information they gathered was limited in that the rates in the report are quoted in exceedingly small units. The rate equates to 1.3824 cm per day, or slightly over half an inch per day. This means that in parts of the site, infiltration of water into the ground will be extremely slow. In any storm this implies that there will be considerable run-off and hence that parts of the development site could easily become flooded. This is a significant problem for Grade 2 listed Diggens Farm and beyond. The Flood Risk and Drainage Strategy has based their assumptions on 255 dwellings and 1 institution rather than a 90-bed assisted complex, therefore the Town Council questions the validity of these conclusions

The figures on Pages 494 to 496 of the Flood Risk and Drainage Strategy suggest that there are potential problems of flooding. There are other areas of the document that contradict their statement on Page 20 it states that the AWRC has the capacity to serve 545 new dwellings in Aylsham, but page 515 it states that it does not have the capacity to treat the flows of the development site.

There is evidence from the Rivers Trust that states that in 2021 the Water Recycling Centre has overflowed into the River Bure on 47 occasions for a total of 95 hours. This is of particular concern when this has happened before the developments have started. There is a real danger that the overflow will impact adversely on the invaluable chalk streams and filter into the Norfolk Broads. These problems are made worse in that the Environment Agency has been stretched by having reduced funds and a cut in its skilled workforce and there is less management of these issues than 15 years ago.

## Conclusion

In conclusion, as is fully explained in the first section of this statement, the Town Council considers that **planning application 20222089 should be withdrawn** before it comes before the Planning Committee.

If it does reach the Planning Committee the second part of this **objection** sets out the reasoned justification why this proposal should be refused.

Aylsham Town Council has carefully considered this application and it has been discussed in detail at our public meeting on February 1<sup>st</sup> 2023. Our submission emphasises that the proposed development presents the town of Aylsham with enormous problems regarding infrastructure as well as overdevelopment. There are many flaws in the planning application that will create considerable problems for Aylsham, the surrounding area, the environment and the climate. The application does not adhere to the principles of the Neighbourhood Plan or to the changes soon to be introduced following a different approach to planning advocated by the Department of Levelling Up, Housing and Communities. In many instances the proposal is contrary to important policies within the Development Plan. Therefore, **Aylsham Town Council objects to planning application 20222089** and states that Broadland Planning Committee should reject Norwich Road site as a development.