

PF/16/1251: Planning Application for a car park and new toilet facilities in North Lodge Park, Cromer

Barry Meadows

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To: nicola.baker@north-norfolk.gov.uk <nicola.baker@north-norfolk.gov.uk>;

 1 attachments (571 KB)

PF_16_1251 Views of proposed car park area.pdf;

Dear Nicola,

[PF/16/1251 Planning Application for a car park and new toilet facilities in North Lodge Park, Cromer](#)

The committee for the Friends of North Lodge Park have special interest in the planning application for a car park and new toilet facilities in North Lodge Park.

We have been assured, supported by legal advice, that the council must treat the application in the same way that an application from any developer would be treated and that all the necessary information would be submitted as part of the planning application. In fact, the legal advice suggests that the planning process should be extra vigilant to ensure there is no bias towards an application the council is making and assessing. We want to make sure that full and accurate information is published to allow an informed decision to be made.

We were surprised that the initial application lacked much of the detail that would normally be required before an application was accepted as valid, and thus we asked that the application be withdrawn until all the necessary reports were available.

We are also now concerned that details are still being added to the application after the close of public consultations, and that some of these details are not to the standard expected.

Whilst we have been unable to ascertain the process and timescales for assessment of the application, except that at some stage it will go to the development committee, we are sure that by now it will be being assessed by your department, and trust that proper due process will now be followed.

We are sure that you will follow due probity, but having seen the first consultation response from Cathy Batchelar, we are concerned that this response is not treating this application in the same way you would treat another developer.

The application made no reference to the proposal being in a conservation area and does not make any attempt at assessing its visual impact. Cathy has therefore made her own assessment and has concluded that the impact would not be significant. We are concerned that Councillors will only have this unsubstantiated view to make a decision. In the absence of any Landscape and Visual Impact Assessment we understand that Cathy would need to at least:

- Identify systematically the likely landscape and visual effects of the Development and indicate the measures proposed to avoid, reduce, remedy or compensate for these effects
- Estimate the magnitude of the effects as accurately as possible;
- Provide an assessment of the nature and significance of these effects in a logical and well-reasoned fashion

Instead her report simply suggests that "due to the degree of enclosure.... the visual impact would not be significant". In her consultation response, Cathy has suggested that the site is not visually prominent due its frontage enclosed by a boundary wall. The suggestion is therefore that you will not be able to see the proposed car park. We would point out that that boundary wall is only 4ft tall and part of it is being removed to allow the access. Moreover, the car park area will be clearly visible from the main pedestrian approach routes and seating areas.

See attached photo sheet for views of the area.

The application is for a change of use and what is the greatest suggestion of lack of due process is that her consultation report only considers the development itself and not its use. Nowhere in her assessment does she consider the visual impact of 48 cars parked in this area or the effect on the Conservation Area of the traffic trying to get to it, in to it and away from it.

It appears that the planning department has made their own assessment of the likelihood of bats in the area. We would have thought you might be concerned at the lack of independence of this approach. One of our members has reported that In a recent planning application on another project Cathy Batchelar criticised a Bat Survey undertaken by the Norfolk Wildlife Trust because the survey was "limited due to inability to access all of the loft spaces and in this regard was not comprehensive. There was no desk top survey which is a recommended component of Bat Surveys as stated in the Bat Conservation Trust publication Bat Surveys, Good Practice Guidelines, 2012." It is difficult to not interpret this as a case of double standards. The assessment undertaken by NNDC's landscape officer and relied upon by Cathy in her consultation report does not cover the roof void and also does not include a desk top survey.

We presume Cerys has a Natural England licence for undertaking bat surveys but it is puzzling her assessment does not adopt the same level of detail as that undertaken by consultant ecologists. As well as not inspecting the void and producing a desk-top survey there are two significant omissions in her assessment:

1. There is no assessment on the impact on bats or their foraging habitat from increased human presence generated by the car park or the noise generated by cars and light from their headlights.
2. There are no proposals for enhancing the opportunities for diversity and roosting and foraging potential for bats.

Cathy acknowledges that the submitted application does not address the impact of the development on the adjacent trees. However, It is surprising that NNDC are now suggesting that applications do not need an arboricultural impact assessment but that method statements can now be conditioned as this has not been allowed in your planning permissions in the past. One of the purposes of a BS5387 tree survey is to identify constraints to inform design. The current design would require excavations to provide a suitable sub-base for the adjacent parking space and this might be impossible to achieve. Again, if this is accepted, such a relaxation of standards is a major concern.

Cathy has stated that the lighting proposals are acceptable, although the lighting information is just a manufacturer's design and not a lighting assessment. To what design standards and policy documents is Cathy saying the lighting is acceptable?

These points regarding the Landscape Officer's comments highlight the Friends concern that the application is not being dealt with in the same way as any other applicant. Indeed when the Friends recently made an application to erect a shed in North Lodge Park, in spite of the location being shown on plans and it being described as a 4ft x 6ft timber shed, the Planning Department would not validate the application until they received a dimensioned floor plan of a standard domestic shed! The current application does not include any dimensions which in our view are rather more critical than that of a shed. For example the size of the parking bays which scale 4.8m x 2.4m rather than those required by your Parking Standards.

I hope that now this application has reached the stage of assessment by your department you will ensure due probity is established.

Barry Meadows
Secretary, Friends of North lodge Park