



Committee Report

Planning Committee North – 11 April 2023

Application no DC/22/3156/ARM

Location

Town Farm
Loam Pit Lane
Halesworth
Suffolk
IP19 8EZ

Expiry date 6 November 2022

Application type Approval of Reserved Matters

Applicant Badger Building (E. Anglia) Ltd

Parish Halesworth

Proposal Approval of Reserved Matters of DC/18/4947/OUT - Outline Application (Some Matters Reserved) - for up to 190 dwellings (Class C3) with associated access, landscaping, open space and drainage infrastructure at land south of Harrisons Lane, Halesworth. All matters are reserved, save for access - and details to address the requirements of Conditions 2, 5, 6, 7, 10, 15, 16, 17, 21, 22, 23, 24, 26, 27, 28, 29, 30, 31, 32, 33 and 34.

Case Officer Phil Perkin
07585 123438
philip.perkin@eastsuffolk.gov.uk

1. Summary

- 1.1. The site forms part of the Halesworth/Holton Healthy Neighbourhood allocation under Policy WLP4.1 of the local plan which comprises a mixed use development of sports facilities, care home and retirement living units and 215 dwellings. Outline planning permission for up to 190 houses was granted in October 2019 and this application seeks reserved matters approval for 188 dwellings. The application therefore represents a significant proportion of the residential element of WLP4.1.

- 1.2. The reserved matters relate to the appearance, landscaping, layout and scale of the proposed dwellings, together with areas of new open space and the provision of new pedestrian and vehicular accesses into the site from Harrisons Lane. The application also seeks the discharge of a number of conditions of the outline consent. Clear design parameters for the design and layout of the site were established at outline stage and this reserved matters submission works positively with those.
- 1.3. The principle of residential development on the site is established and the reserved matters are considered to be acceptable and in accordance with policies in the Local Plan and sufficient details have been submitted to enable the discharge of conditions. There are no technical barriers to development and whilst noting the local concerns, the proposal complies with the development plan. There are no identified policy conflicts or any material planning harm resulting from the reserved matters proposals.
- 1.4. It is recommended that the application be approved.

2. Site Description

- 2.1. The application site is located on the north eastern edge of Halesworth and it sits half in Halesworth Town and half in Holton Parish. It covers an area of approximately 8.55 ha of agricultural land to the south of Harrisons Lane and Bungay Road. The western part of the site is generally flat before sloping down gently to the lowest part of the site adjacent to Bungay Road to the east.
- 2.2. To the north of Harrisons Lane is established residential development comprising primarily of detached bungalows and houses in generous grounds. Immediately to the west is the site of the former Halesworth Middle School and the North Suffolk Skills Centre. In the southern part of the site are 5 large former poultry buildings. Immediately to the west of these buildings, but lying beyond the boundary of the application site, is Town Farm, a Grade II listed building. The site itself does not contain any designated or non-designated built heritage assets. To the south beyond a field, is new residential development currently under construction and to the east is open countryside with the village of Holton beyond.
- 2.3. There is a public right of way (Public Footpath 7, Loam Pit Lane) running southwards from Harrisons Lane through the site to the southern boundary and beyond to Holton Road, which leads into the centre of Halesworth. There are a number of trees along Loam Pit Lane. There is also a public right of way (Public Footpath 16) running from Bungay Road along the eastern and southern boundaries of the site and linking into Loam Pit Lane (the surface of this has recently been improved with CIL funding). Trees and hedges exist along much of the site boundaries.
- 2.4. The site is allocated under Local Plan Policy WLP4.2 as part of the Halesworth Healthy Neighbourhood comprising residential development, a health care facility and retirement community, sports facilities and education/training facilities.

3. Proposal

- 3.1. Outline planning permission for up to 190 dwellings on the site was granted in October 2019 (Ref. DC/18/4947/OUT) and is subject to a legal agreement covering issues such as

affordable housing, open space and habitat mitigation. The location of the vehicular access into the site from Harrisons Lane was approved as part of the outline consent. This application seeks the approval of the outstanding Reserved Matters of Appearance, Landscaping, Layout and Scale in respect of the previously permitted outline planning permission for up to 190 dwellings, together with areas of new open space and the provision of new pedestrian and vehicular routes within the site.

- 3.2. A total of 188 houses are proposed of which 56 will be affordable houses in accordance with the S106 Agreement. Also included within the layout is space for 9 dwellings as 'self-build dwellings', as required by the outline consent.
- 3.3. A mix of dwelling types and sizes are proposed ranging from one bedroom flats to four bedroom detached houses. Building heights are generally proposed to be two storeys although there are a small number (15) of bungalows mainly located in the southern part of the site. The two blocks of one bed flats in the south western corner of the site extend up to three storey height. Proposed materials include a mix of red and buff bricks, red and grey pantiles, cream render and black boarding. In all there are 15 different house designs across the site.
- 3.4. The main area of open space is located in the southern part of the site. There is further open space provision adjacent to the attenuation basin in the eastern part of the site and the public right of way. Loam Pit Lane will be set within a landscaped corridor of open space. Proposed pedestrian routes include a cycle/footpath along the Harrisons Lane frontage to link into the existing facility to the west; a footpath along part of the southern boundary links the development to the Campus site to the west and links are provided to Public Footpath 16 along the south eastern boundary and to Loam Pit Lane. Footpaths within the development lead pedestrians to the main open space areas.
- 3.5. In addition to the reserved matters this application also seeks the discharge of a number of conditions of the outline consent as detailed in the Planning Considerations section below.

4. Consultations/comments

- 4.1. In response to public consultation 10 letters of objection have been received raising the following matters:
 - Lack of doctors services and school places.
 - The proposal should be considered in conjunction with other proposals in Harrisons Lane and Norwich Road.
 - Traffic generation from a combination of developments - Harrisons Lane is a bus route and already busy.
 - There does not appear to be enough parking within the development.
 - Problems with surface water drainage in wet weather, will the drainage scheme work.
 - The density of development is too high.
 - The pedestrian routes are poorly thought out.
 - Why not position the open space further north so existing residents can benefit
 - The "modern edge" contrasts with existing properties in the locality.

- The loss of good arable land is regrettable
- Residential amenity. Car headlights will shine into our property from the access.
- Houses are too small. Internal floorspace does not meet minimum national standards.
- More houses are not needed in Halesworth.

Consultees

Please note, that due to a consultation error no consultation was sent to Holton Parish Council. They have been contacted and intend to respond in time for the update sheet. Previously they have endorsed the Halesworth Town Council response and may do again.

Halesworth Town Council

Consultee	Date consulted	Date reply received
Halesworth Town Council	18 August 2022	30 September 2022
<p>A review of “DC/22/3156/ARM” Approval of Reserved Matters of DC/18/4947/OUT - Outline Application (Some Matters Reserved) - for up to 190 dwellings Class C3) with associated access, landscaping, open space and drainage infrastructure at land south of Harrisons Lane, Halesworth.</p> <p>1. Initial appearances are of a comprehensive application but when looked at in more detail it is a rather uninspiring housing estate proposal. There is nothing new, exciting or futureproof about this application.</p> <p>2. Design Principles – These are fine very wordy aspirations but also very vague. They can be interpreted in many ways and there is nothing about sustainability or meeting the future challenges of energy costs, global warming etc.</p> <p>3. The plans do not reflect the age in which we live. Although there are proposals for improved insulation there are no modern forms of construction, sustainable energy provision, water and energy conservation measures, sustainable materials, solar gain provision and rainwater harvesting. All these aspects of modern construction should have influenced the way that site was designed so that the houses would meet the requirements of the future and not of the past. There is no evidence of building for the future in the Build and Access Statement.</p> <p>4. Housing Density – The description in WLP4.4 in the Local Plan is for a housing density of 30 per hectare on the 7 hectare site but because a significant area is reserved of the SuDS the density on the built on area could well be higher.</p> <p>5. Access Road – the position is inappropriate as it is directly opposite a property. A better position is opposite the entrance to Warwick Avenue where there is room for a roundabout. 190 dwellings probably equate to between 250 to 300 cars due to there being limited employment within walking or cycling distance; no secondary school; limited tertiary education or apprenticeships; only a poor hourly bus services to Norwich, an infrequent one to Southwold and an hourly train service to Lowestoft and Ipswich. Due to the lack of local employment and very often the need for two salary earners, two cars per household are essential. If there is an adult offspring at home a third car will be needed. A small roundabout at the entrance of Warwick Avenue will increase safety by slowing traffic on Harrisons Lane and ensure easier access and egress from the housing estate.</p> <p>6. Parking – Due to the very close similarity between the colour used to indicate places for resident to park and places for visitors, it's impossible to assess the parking provision. However, there</p>		

would appear to be insufficient, especially for visitors. More parking space needs to be made available if a cluttered streetscape, seen in so many housing estates, is to be avoided

7. Harrisons Lane – It would appear that it has not been recognised that at the eastern end of Harrisons Lane, the road narrows significantly down the hill to the junction with Fair View Road. Harrisons Lane is busy at the normal peak times and will be even busier in the future with the 200+ cars from the estate and the many visitors to the Skills Centre and Campus. Not every car exiting the housing estate, the Skills Centre or the Campus will turn left to Norwich Road. Many will turn right because that is their direction of travel; others will take this route through Holton to avoid the bottleneck junction of Harrisons Lane and Norwich Road.

8. Harrisons Lane/Norwich Road /Old Station Road Junction - There is also a potential dangerous bottleneck being created at the junction of Harrisons Lane and Norwich Rd (with the inclusion of the offset junction with Old Station Rd). Norwich is the main route into and out of Halesworth to and from the North, it's a busy road and exiting right out of Harrisons Lane can be difficult with the added danger of this being a blind junction. The amount of cars forecast to be added to the morning and evening peak travel times will make this junction difficult. A set of traffic lights at this busy intersection would increase safety and ease the flow of traffic.

9. Bins - Bin storage on each property is a good idea provided it is sheltered. However, designated collecting points are an unacceptable idea for the aged, infirm and physically challenged. An alternative arrangement for bin collection must be implemented with bins collected from outside each property.

10. Garages – A significant number of properties do not have a garage. All properties have a garden so where will the residents keep their gardening equipment; their bikes and prams; large hobby and sports equipment, and all the other “stuff” that is part of family life and makes it so enjoyable?

11. Open Spaces and Play Areas – Policy WLP8.29, Design of Open Spaces states

“8.177 Open Space is an essential part of the rural and urban fabric and is a vital resource for local communities. It plays a pivotal role in the quality of life for people from determining a person’s health and well-being, contributing to the character of our townscapes and providing habitats for wildlife. Open spaces should provide facilities that are accessible and meet the needs and expectations of the local community, and ensure communities have a high quality of life for residents and visitors. The types of open space covered by this policy include wildlife areas, natural greenspace, parks and gardens, amenity greenspace, play space, allotments and green corridors. The open space would usually be publicly accessible or with controlled public access.” And “8.179 Each new area of open space should have at least two good street frontages and be well overlooked, with adjacent properties facing the open space as much as possible. Entrances and connections with streets and spaces should also be well overlooked and”.

What is proposed in the master plan is contrary to the requirements if the Local Policy for Open Spaces, WLP8.30. The master plan needs to be amended accordingly and the new design should be inclusive for people of all ages and abilities. There appears to be total lack of any amenity space or play area within the housing area. The open areas are pushed to the outer perimeter of the site where they are not overlooked. WLP1.3 states that *“Open space should be provided on residential development sites of 1 hectare or more in size and be based on the needs identified in the Waveney Green Infrastructure Strategy and Open Space Needs Assessment”* The lack of amenity space and

play areas overlooked and within the site is a major deficiency of this proposal and so it is important that ESC Planning Department implements the relevant Policies of their own Local Plan.

12. Surface Water – The eastern end of Harrisons Lane and Fair View Road are known for their frequent flooding. Since a very large proportion of the proposed site will be covered with impervious hard surfaces and so the risk of serious surface water runoff must not be underestimated. The siting of the proposed SuDS is only a few metres away from the junction of Harrisons Lane and Fair View Road, and is a few metres higher than the junction possibly increasing the risk of flooding off the site. The developer must ensure that whatever surface water handling system is installed it must not increase the risk of flooding on the road leading down to Holton village

13. Site Maintenance - The “Preliminary SuDS Management and Maintenance Plan” states:- *“The responsibility for the maintenance of private drains and permeable block paved driveways rests with householders for features within the curtilage of their own property. Shared private drainage, permeable access roads, the detention basin and perimeter ditches will be maintained by a Management Company on behalf of the residents. The main piped drainage systems are to be adopted by Anglian Water under a S104 Agreement.”*

While this is not a normal planning matter, but how the maintenance of everything within the site but outside the house plots will be managed is critical to the future harmony of residents. The Management Company proposed by the developer must not be the responsibility of the residents and it needs to be agreed before construction work begins.

Conclusion

This master plan needs a radical rethink so as to:-

- improve safety along Harrisons Lane by repositioning the access road, creating a roundabout and widening the narrow approach to Fair View Road.
- build properties to meet the demands of the future using environmentally friendly methods and with sustainability as the objective.
- provide a garage or an equivalent secure storage building on all plots.
- reduce the density of the housing to enable amenity and play spaces to be created between the houses.
- provide more parking space since many house will need 2 or more vehicles to live on this development and work in the area.
- redesign the bin collecting system so that all residents, including the frail infirm and elderly can have their bins emptied without putting them under physical stress.
- implement ESC’s Local Plan’s Policies for Amenity, Play and Open Spaces in full so as to provide a desirable quality of life for the residents and a more attractive streetscape and desirable place to live.
- finalise the management arrangements for site maintenance before construction begins.

Also:-

- There appear to be 29 missing drawings that are listed in the Design and Access statement.
- The aerial photo is of Bungay not Halesworth.
- Halesworth is referred to as a village.
- This shows a lack of attention to detail, worrying in a planning application for 190 houses

Consultee	Date consulted	Date reply received
Natural England	N/A	17 October 2022
Summary of comments: No objection.		

Consultee	Date consulted	Date reply received
Natural England	23 September 2022	29 September 2022
Summary of comments: No comment.		

Consultee	Date consulted	Date reply received
SCC Highways Department	18 August 2022	17 November 2022
Summary of comments: Further information required.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	18 August 2022	1 September 2022
Summary of comments: Holding objection because insufficient information has been submitted to support a surface water drainage strategy.		

Consultee	Date consulted	Date reply received
Sport England	18 August 2022	30 August 2022
Summary of comments: The proposed development does not fall within either our statutory remit or non-statutory remit.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Water Management Alliance	N/A	9 September 2022
Summary of comments: Advisory comments.		

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	21 September 2022	26 September 2022
Summary of comments: The affordable housing mix is agreed.		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	19 August 2022	23 September 2022
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	19 August 2022	23 September 2022
Summary of comments: No objection subject to condition.		

Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	N/A	26 September 2022
Summary of comments: Recommends discharge of Condition 31.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	N/A	5 October 2022
Summary of comments: Recommend discharge of conditions 16 and 17 (under review). Asbestos on site requires remediating, therefore conditions 18 and 19 remain outstanding .		

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	18 August 2022	17 January 2023
Summary of comments: No further comments.		

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	18 August 2022	No response
Summary of comments: Internal consultation; see report.		

Consultee	Date consulted	Date reply received
Anglian Water	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	18 August 2022	1 September 2022
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Essex And Suffolk Water PLC	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	18 August 2022	8 September 2022
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Suffolk Police Design Out Crime Officer	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	18 August 2022	19 August 2022
Summary of comments: The planning obligations previously secured under the earlier planning permission must be binding upon this application.		

Consultee	Date consulted	Date reply received
SCC Rights Of Way	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Spatial Planning And Sub Regional Partnerships Manager	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	18 August 2022	23 September 2022
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Waveney Norse - Property And Facilities	18 August 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Anglian Water	N/A	13 February 2023
Summary of comments: No further comments.		

Re-consultation

Consultee	Date consulted	Date reply received
SCC Flooding Authority	16 February 2023	9 March 2023
Summary of comments: Recommend holding objection at this point to allow a climate change sensitivity check.		

Consultee	Date consulted	Date reply received
Anglian Water	17 January 2023	1 March 2023
Summary of comments: No objection.		

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	17 January 2023	15 March 2023
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Essex And Suffolk Water PLC	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	17 January 2023	16 February 2023
Summary of comments: No objection.		

Consultee	Date consulted	Date reply received
Natural England	17 January 2023	8 February 2023
Summary of comments: See previous response.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	17 January 2023	No response
Summary of comments:		

Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Halesworth Town Council	17 January 2023	1 February 2023

“DC/22/3156/ARM” Approval of Reserved Matters of DC/18/4947/OUT

It would appear that the revised documents provided by the applicant do not address the concerns raised by neighbours, members of the public or Halesworth Town Council, the very people who have the relevant local knowledge regarding the site.

There has been no acknowledgment and a total disregard by the applicant of the comments made by individuals, who are not statutory Consultees.

Halesworth Town Council recommends that this application be refused until the applicant addresses these concerns and that East Suffolk Council ensures that its Policy guidelines in the Local Plan are implemented.

Reasons for Rejection

1. Design Principles – The 1993 Suffolk Design Guide for Residential Areas (revised 2000) are referred to as the design guideline. However, this document is way out of date and as a consequence there is nothing about sustainability or meeting the future challenges of energy costs, global warming etc. Although there are proposals for improved insulation, there are no modern forms of construction, sustainable energy provision, water and energy conservation measures, sustainable materials and solar gain provision. All these aspects of modern construction should have influenced the way that site was designed so that the houses would meet the requirements of the future and not of the past. There is no evidence of the concept “Building for the Future” in the Build and Access Statement.
2. House Size - Firstly, the vast number of documents and drawings submitted have made it very difficult to assess what is being offered. However, the houses are small for a family to occupy in comfort. There appears to be very little storage space for all the items needed for a family to function and what a purchaser would expect.
3. Housing Density – The description in WLP4.4 in the Local Plan is for a housing density of 30 per hectare. However, because a significant area is reserved of the SuDS the density on the built on area could well be higher. Policy WLP8.31 para 8.191 states that “housing density is calculated using only the site areas which will be developed for housing”. It must be checked that this requirement is met.
4. Access Road – HTC has already commented that the position of the proposed site entrance is inappropriate as it is directly opposite a property. A better position would be opposite the entrance to Warwick Avenue where there is room for a roundabout. 190 dwellings probably equate to between 250 to 300 cars due to there being limited employment within walking or cycling distance; no secondary school; limited tertiary education or apprenticeships; only a poor hourly bus services to Norwich, an infrequent one to Southwold and an hourly train service to Lowestoft and Ipswich. A small roundabout at the entrance of Warwick Avenue will increase safety by slowing traffic on Harrisons Lane and ensure easier access and egress from the housing estate.
5. Harrisons Lane Road Safety – Previous comments by HTC about the Harrisons Lane/Bungay Road junction have been ignored. It appears that it is assumed that virtually all traffic leaving the site will turn westwards towards the Harrisons Lane/Norwich Road junction. However, this junction is already very busy at peak times and this will only be exacerbated by the additional vehicles from the housing estate and by future users of the Campus facilities. As a consequence many drivers

leaving the site and going towards Saxmundham or Lowestoft will use the route Harrisons Lane to Holton to avoid both the bottleneck junction on Norwich Road and having to go through Halesworth. The road width close to the proposed site entrance is approximately 5.2m but down the slope towards the junction with Bungay Road it narrows significantly to 4.6., both less than the advised standard road widths. This is a dangerous junction due its layout and the high sloping banks either side of the last part of Harrisons Lane and thus any increase in traffic will make the junction even more dangerous. As a condition of approving this planning application a S106 agreement is necessary to widen the lower part of Harrisons Way make the junction safe for road users.

6. Harrisons Lane/Bungay Road Pedestrian Safety: - A path runs along the south side of Harrisons Lane, on top of the slope and around the bend where it drops down to Bungay Road. Just short of the junction a series of steps have been added to the plan which go down from the path to the road edge right by the junction on the inside of the bend. Such a dangerous addition can only be considered by someone who has not visited the site. The steps need to be removed for safety reasons.

7. Bins – HTC’s objections to designated refuse bin collecting points has been ignored. They are an unacceptable idea for the aged, infirm and physically challenged and these communal areas will become dumping grounds. An alternative arrangement for bin collection must be implemented with bins collected from outside each property. Also, bin storage on each property should be sheltered and not visible from the street.

8. Garages – As already pointed out by HTC, a significant number of properties do not have a garage. All properties have a garden but there is no provision for storing prams, pushchairs, wheelchairs, toys, cycles etc. and all the other “stuff” that is part of family life and makes it so enjoyable. Not providing storage space for the normal bulky items that residents as part of a modern life style is unacceptable and plans need to be redrawn to include such essential facilities.

9. Parking:- The inadequacy of parking provision for residents will result in the new roads being obstructed by parked cars and job related vans as is experienced on other estates in the neighbourhood. Access for service and emergency vehicles will be difficult. It must be recognised that most households on this site will need two vehicles and many will require 3 -4 vehicles if mature off-springs are to follow apprenticeships, tertiary education or employment.

10. Open Spaces and Play Areas – Policy WLP8.30, under “Layout” states that they should be “safe places with overlooking from nearby dwellings and other active uses and a strong relationship to the street and nearby properties. This is certainly not the case since the open spaces, in particular the proposed play area, are peripheral and screened off by vegetation. ESC must ensure that its Policy guidelines for Open Spaces and Play Areas are implemented by the developer. Also under “Use”, Policy WLP8.30 states that the design should “Provide opportunities for a range of recreational activities to appeal to different ages and abilities”. What is proposed is totally inadequate and an area for playing football and other ball games plus a trim track or something similar should be included in the site plan. It is important that ESC’s ensures that its policy guidelines are implemented.

11. Surface Water – The eastern end of Harrisons Lane and Bungay Road are known for their frequent flooding. Since a very large proportion of the proposed site will be covered with impervious hard surfaces and so the risk of serious surface water runoff must not be underestimated. The siting of the proposed SuDS is only about 14m metres away from the junction

of Harrisons Lane and Bungay Road and the SuDS high water mark is 2.5m higher metres higher than the road junction. There would appear to be a serious possibility of an increase in the risk of flooding off the site. The developer must ensure that whatever surface water handling system is installed it must not increase the risk of flooding on the road leading down to Holton village. Anglia Water must be more than satisfied that there is no risk of surface water run-off increasing the risk of flooding in Holton.

12. Site Maintenance - The "Preliminary SuDS Management and Maintenance Plan" states:- "The responsibility for the maintenance of private drains and permeable block paved driveways rests with householders for features within the curtilage of their own property. Shared private drainage, permeable access roads, the mitigation basin and perimeter ditches will be maintained by a Management Company on behalf of the residents. The main piped drainage systems are to be adopted by Anglian Water under a S104 Agreement." While this is not a normal planning matter, however, how the maintenance of everything within the site but outside the house plots will be managed is critical to the future harmony of residents. The Management Company proposed by the developer must not be the responsibility of the residents and it needs to be agreed before construction work begins. How this will be arranged and who pays for the maintenance is not explained but it needs to be agreed before construction begins.

Conclusion

Since the previous comments have largely been ignored by the developer the comments remain basically the same and HTC recommends that this application is refused until its concerns are taken seriously and resolved. This master plan needs a radical rethink so as to:-

- Improve safety along Harrisons Lane by repositioning the access road, creating a roundabout and widening the narrow approach to Fair View Road.
- Build properties to meet the basic needs of the home owners, by building in sufficient storage space within the house.
- Use modern sustainable build methods and materials.
- Reposition the play area in a more central and overlooked position so that activities can be monitored.
- Provide a range of recreational activities for a range of ages and abilities, especially an area for ball games.
- Ensure that existing flooding off the site is not exacerbated by on site surface water dispersal methods.
- Provide a garage or an equivalent secure storage building on all plots.
- Reduce the density of the housing to achieve the 30 dwellings/hectare target on the build area and so enable amenity and play spaces to be created between the houses.
- Provide more parking space since many house will need 2 or more vehicles to live on this development and work in the area.
- Redesign the bin collecting system so that all residents, including the frail, infirm and elderly can have their bins emptied without putting them under physical stress.
- Implement ESC's Local Plan's Policies, especially for Amenity, Play and Open Spaces in full so as to provide a desirable quality of life for the residents and a more attractive streetscape and desirable place to live.
- Finalise the management arrangements for site maintenance before construction begins.

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	17 January 2023	No response
Summary of comments: Internal consultation; see report.		

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	17 January 2023	18 January 2023
Summary of comments: The planning obligations previously secured under the earlier planning permission must be binding upon this application.		

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	17 January 2023	17 January 2023
Summary of comments: No further comments.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	17 January 2023	6 February 2023
Summary of comments: Recommend approval of condition 24 (maintenance and management plan) and refusal of conditions 23 (surface water drainage strategy) and 26 (Construction Surface Water Management Plan) .		

Consultee	Date consulted	Date reply received
SCC Highways Department	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Rights Of Way	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Spatial Planning And Sub Regional Partnerships Manager	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Sport England	17 January 2023	19 January 2023
Summary of comments: The proposed development does not fall within either our statutory remit or non-statutory remit.		

Consultee	Date consulted	Date reply received
Suffolk Police Design Out Crime Officer	17 January 2023	7 February 2023
Summary of comments: Strongly recommend Secured by Design principals are implemented. Advisory comments to reduce the likelihood of crime occurring.		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	17 January 2023	7 February 2023
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Waveney Norse - Property And Facilities	17 January 2023	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Water Management Alliance	17 January 2023	3 February 2023
Summary of comments: No further comments.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	14 March 2023	Comments awaited

Publicity

The application has been the subject of the following press advertisement:

Category Major Application	Published 30 September 2022	Expiry 21 October 2022	Publication Beccles and Bungay Journal
Category Major Application	Published 30 September 2022	Expiry 21 October 2022	Publication Lowestoft Journal
Category Departure	Published 26 August 2022	Expiry 19 September 2022	Publication Lowestoft Journal
Category Departure	Published 26 August 2022	Expiry 19 September 2022	Publication Beccles and Bungay Journal

Site notices

General Site Notice

Reason for site notice: Major Application Affects Setting of Listed Building In the Vicinity of Public Right of Way

Date posted: 14 October 2022

Expiry date: 4 November 2022

5. Planning policy

National Planning Policy Framework 2021

WLP1.1 - Scale and Location of Growth (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP1.2 - Settlement Boundaries (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP4.1 - Halesworth/Holton Healthy Neighbourhood (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.1 - Housing Mix (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.2 - Affordable Housing (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.3 - Self Build and Custom Build (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.21 - Sustainable Transport (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.24 - Flood Risk (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.28 - Sustainable Construction (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.29 - Design (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.30 - Design of Open Spaces (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.31 - Lifetime Design (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.32 - Housing Density and Design (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.34 - Biodiversity and Geodiversity (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.35 - Landscape Character (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.37 - Historic Environment (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP8.40 - Archaeology (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

HAL.HSG1: Provision of Larger Housing - (Halesworth Neighbourhood Plan, February 2023)

HAL.HSG3: Low energy and energy efficient housing design - (Halesworth Neighbourhood Plan, February 2023)

HAL.ED3: Major development opportunities - (Halesworth Neighbourhood Plan, February 2023)

HAL.DH1: Design - (Halesworth Neighbourhood Plan, February 2023)

HAL.COM1: Play facilities - (Halesworth Neighbourhood Plan, February 2023)

HAL.TM1: Key movement routes - (Halesworth Neighbourhood Plan, February 2023)

HAL.TM2: Cycle parking - (Halesworth Neighbourhood Plan, February 2023)

HAL.TM3: Residential electric car charging - (Halesworth Neighbourhood Plan, February 2023)

6. Planning Considerations

Planning Policy

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, determination must be made in accordance with the plan unless material considerations indicate otherwise. This is reflected in paragraph 12 of the NPPF, which affirms the statutory status of the development plan as the starting point for decision making. The relevant policies are set out above.
- 6.2. The Halesworth Neighbourhood Plan was prepared by Halesworth Town Council. The plan was formally 'made' (adopted) at Full Council on 22 February 2023 and therefore it forms part of the development plan.

Principle of Development

- 6.3. The development plan comprises the East Suffolk Council Waveney Local Plan and any adopted Neighbourhood Plans. The relevant policies of the local plan are set out above. It is important to note that the NPPF paragraph 11 requires that planning decisions apply a presumption in favour of sustainable development and that means, for decision taking, approving development proposals that accord with an up-to-date development plan without delay.
- 6.4. The local plan was adopted in March 2019 and sets out the level of growth which needs to be planned in the area and identifies where that growth should be located in the period up to 2036 (Policies WLP1.1 and WLP1.2). As part of this spatial strategy the Halesworth and Holton area is expected to deliver approximately 8% of housing growth in the Waveney Local Plan area.

- 6.5. The site forms part of the Halesworth/Holton Healthy Neighbourhood under policy WLP4.1 of the local plan, a comprehensive mixed use development comprising:
- Approximately 215 dwellings;
 - Health Care Facility and Retirement Community;
 - Sports Facilities including, playing pitch, 3G pitch, and indoor sport facilities; and
 - Education/Training Facility.
- 6.6. Outline planning permission for up to 190 dwellings on the site was granted in October 2019. The principle of residential development on the site is therefore accepted and this application comprises a significant proportion of the dwellings allocated by WLP4.1. The allocation and the outline consent forms part of the strategy for growth as set out in Policy WLP1.1 of the local plan which sets out that Halesworth and Holton are allocated higher proportions of growth reflecting Halesworth's status as a market town with good transport links, provision of employment facilities, shops and other services and facilities.
- 6.7. It is also noteworthy that planning applications on adjacent land considered by this Committee for a care home, extra living apartments and grass and 3G pitches have recently been/will shortly be approved. Again, these are significant elements of the Halesworth/Holton Healthy Neighbourhood coming to fruition.
- 6.8. In order to address the infrastructure needs of the town and area resulting from the combined amount of growth planned the following essential and desirable infrastructure was identified in the Local Plan. Updates on their delivery are also stated:
- Secondary Education - Expansion of Bungay High School - £624,070 CIL funding - project completed.
 - Primary Education - Expansion of Edgar Sewter Primary School - £1,364,272 CIL funding - project completed.
 - Pre-School Education - Delivery of a new 30 place Nursery at Holton St Peter Primary School - £ 1,230,000 CIL Funding - Planning Permission granted and due to be completed Autumn 2023.
 - Sports and Leisure - Delivery of improved pitch facilities and a 3G pitch at Halesworth Campus - £1,641,997 CIL funding - Planning permission pending due to be delivered 2023/24.
 - Community Building - Land secured in pending Dairy Farm application. Subject to funding.
 - Youth - Town Council and Community led project underway (Youth Action Halesworth and Rural YAHR) to plan for a replacement of the Apollo youth club facility and other youth needs.
 - Healthcare - Opportunities to expand Cutlers Hill Doctors Surgery have been discussed with the Integrated Care Board (ICB) and CIL funding offered (subject to a bid) however this is dependent on the Practice Partners/building owners bringing forward an expansion project in conjunction with the ICB.
 - Neighbourhood CIL - Halesworth Town Council is already receiving Neighbourhood CIL and based on all planned growth this is likely to total in excess of £600,000 for local infrastructure projects. Approximately half of the Neighbourhood CIL collected from this site will go to Holton Parish Council based on the parish boundary through the site.

- 6.9. Considering the amount of growth planned for the town and the vast majority of it not yet commenced, a remarkable success has been achieved in this area in delivering CIL funded infrastructure in advance of new homes being built and occupied.

Highway Considerations

- 6.10. Vehicular access into the site will be from Harrisons Lane in the location previously approved under the outline planning permission DC/18/4947/OUT. Therefore, the proposed vehicular access is established and not for consideration as part of this reserved matters application. To meet Highway Authority requirements, the outline consent secures the widening of Harrisons Lane to ensure the road is to the appropriate specification to accommodate the increased number of vehicles. Also secured as part of the outline consent is a cycle/footpath along the site frontage which will connect into the access to the adjacent site (former Halesworth Middle School) and the new sports facilities proposed by Halesworth Campus under application DC/21/0007/FUL, as the first phase of their proposals. This will therefore ensure good pedestrian connectivity between these two major sites.
- 6.11. The main access road extends to the southern boundary of the site and should enable access to the adjoining field and the remaining area of residential land allocated under Policy WLP4.1 behind the Suffolk Skills Centre. Within the site a proposed footpath along the southern boundary links into the adjacent Campus site to the west. Further pedestrian links are provided to Public Footpath 16 along the south eastern boundary and to Loam Pit Lane thus ensuring there is good pedestrian connectivity through the site to the surrounding network and onto the large open space now being delivered as part of the Hill Farm Road, Hopkins Homes development.
- 6.12. In their initial response the Highway Authority requested details in respect of electric vehicle charging (these details are also required by Condition 27 of the outline consent), details of improvements on Loam Pit Lane (required by Condition 6 of the outline consent) and details of refuse vehicle manoeuvring.
- 6.13. Additional details have been submitted to show that every dwelling will have either a dedicated electrical supply for EV charging or access to an EV charging point, thereby addressing Condition 27. A swept path analysis demonstrates that a refuse vehicle can manoeuvre safely at all turning head locations.
- 6.14. With regards to the improvements to Loam Pit Lane the Highway Authority require details of the width, materials and nature of the path for the discharge of Condition 6. At the time of writing these details are awaited.
- 6.15. Condition 5 of the outline consent pertains to the highway improvements along Harrisons Lane, including the localised highway widening and proposed cycle route. Design drawings demonstrate the proposed widening of Harrisons Lane and the indicative layout of the 3-metre-wide cycle way along the site's frontage. The Highway Authority have confirmed that the drawings are considered acceptable for the discharge of Condition 5; however, all Section 278 and Section 38 drawings will be subject to detailed design review as part of any future Section 278 and Section 38 agreements.
- 6.16. Condition 7 concerns the estate roads through the site. The Highway Authority have confirmed that the aforementioned swept path analysis is acceptable but have raised

some queries with the design of the internal road network, requiring amended plans. An update will be provided in the Update Report. The Highway Authority have confirmed that the footways and cycle routes are designed in line with guidance and are acceptable.

- 6.17. The parking strategy shows a variety of on-street, frontage, on-plot (or curtilage) parking and also garaging. This is considered to be a good mix that ensures that no one parking type dominates the layout. A total of 402 car parking spaces are proposed throughout the site based on 1 space for 1 bed dwellings, 2 spaces for 2 and 3 bed dwellings and 3 spaces for 4 bed dwellings. The Highway Authority have confirmed this is in accordance with the guidance and is considered acceptable. Similarly, provision for cycle parking is considered acceptable as each property will have either a garage or secure area within the curtilage. Condition 10 can be discharged on this basis.

Housing Mix

- 6.18. Local Plan Policy WLP8.1 states that at least 35% of the dwellings should be 1 or 2 bedroom properties. The submitted dwelling size plan indicates that 76 (42%) of the proposed dwellings are 1 or 2 bedroom properties, thereby exceeding the policy requirement. Smaller properties are an important element of housing delivery, being both more affordable and addressing the need for smaller properties for younger people as first time buyers or renters and for older people to downsize. There are no minimum percentage requirements for 3 and 4 bedroom properties in Policy WLP8.1 but the Halesworth Neighbourhood Plan states that proposals should provide a mix of larger properties (3-bed properties or larger) and, in particular, should provide at least 15% as 4-bed properties. 26% of the proposed properties (47) will have 4 bedrooms. For completeness 31% of the proposed properties (56) will have 3 bedrooms.

Affordable Housing

- 6.19. Local Plan Policy WLP8.2 requires all new housing developments with a capacity of 11 or more dwellings in Halesworth to provide 30% affordable housing. 56 affordable dwellings are proposed which complies with WLP8.2. The S106 agreement attached to the outline consent stipulated that 50% of the affordable units should be for affordable rent and 50% should be for shared ownership. A deed of variation submitted with this application seeks to amend the shared ownership element to 25% shared ownership and 25% first homes. This mix was agreed with the Housing Enabling Manager and is in accordance with current policy and the Governments first homes initiative.
- 6.20. The Affordable Housing mix has also been agreed with the Housing Enabling Manager as follows:
- 16 one bed flats
 - 3 two bed bungalows
 - 26 two bed houses
 - 11 three bed houses

Self-Build and Custom Build

- 6.21. Local Plan Policy WLP8.3 and condition 34 of the outline consent requires a minimum of 5% of the development to be self or custom build properties and to be developed in accordance with a set of design principles submitted with an application. The proposal provides 9 plots for self or custom built properties and so accords with the requirement. Following the submission of a revised Self Build Design Code and Marketing Strategy it is

considered that adequate information has been submitted to enable the discharge of condition 34.

Accessible and Adaptable housing

- 6.22. Local Plan Policy WLP8.31 requires that 40% of dwellings should meet Requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings. of the proposed dwelling 83 (44%) will meet this standard, thereby exceeding the policy requirement and is also adequate to enable the discharge of Condition 32 of the outline consent.

Layout, Scale and Appearance of the proposed development

- 6.23. Design quality is given significant weight within the planning process and is one of the main matters for consideration in the determination of this application. Paragraph 126 of the NPPF states that:
"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities".
- 6.24. Local Plan Policy WLP8.29 states that development proposals will be expected to demonstrate high quality design which reflects local distinctiveness. It sets down criteria for new development proposals including, amongst other things, taking account of landscape features and protecting the amenity of the wider environment, neighbouring uses and providing a good standard of amenity for future occupiers of the proposed development.
- 6.25. The outline planning permission permits up to 190 dwellings on the site and requires the reserved matters submission to be in accordance with the approved Parameter Plan which fixed the location of the access into the site, the surface water attenuation basin in the eastern part of the site, the main area of open space to the south and pedestrian links to existing footpaths and the adjacent Halesworth Campus site. These elements are all reflected in the proposed layout.
- 6.26. Having regard to the proposed layout the Principal Design and Conservation Officer considers that the submitted Masterplan illustrates the use of conventional perimeter blocks as a layout tool and this does provide for pleasantly scaled blocks that complement the vehicle and pedestrian networks, being neither too large nor small. All but one such block has an edge condition - that is, one edge forms a development edge also - and this adds to their interest, facing outwards and addressing the development edges where they meet green space, the existing street and adjacent sites. This is the mark of a good layout. The sole 'internal' perimeter block is varied by the use of an internal court which will be an attractive feature to look into from the street.
- 6.27. The Principal Design and Conservation Officer is of the view that the blocks themselves have an attractive loose shape and informal disposition, such that most streetscenes are non-linear. The modestly curvilinear character of the streets reflects well the edge-of-town location of the development site and imparts a semi-urban character that is judged appropriate. It is one, also, that complements the historic town centre, with its long-gestating organic non-linear pattern of growth. Halesworth does not have a formal, planned character, as such - it is a traditional Suffolk market town. The planned character

of the town arises more from the larger scale of the modern single-use developments beyond the town centre, of which this is an unavoidable example. It is noted that the use of perimeter blocks facilitates the layout in being outward facing along its key edges, which themselves provide active frontages that engage with the areas beyond these edges, be they open space, street, or footpath. This is a welcome outcome of the (Masterplan) layout design.

- 6.28. Proposed building heights consist of predominantly two storey dwellings, with little variation in build heights across the development. Where there are single storey and three-story dwellings/apartments, these are located on the edges of the site rather than fully integrated into layout and used to provide some variety in the streetscene. Nevertheless, the uniformity of the two-storey size of dwelling across the rest of the site, is considered acceptable, in the absence of any height variety. This is because the medium scale of development will mitigate the effect of it and the site's sloping topography, in part, will create some interest by varying the roofscape effect of all houses looking a similar height. Furthermore two storeys do also reflect the size of dwelling that can be found in the surrounding area and the bungalows in the south of the site do mitigate the development's impact on the nearby listed Town Farm.
- 6.29. A variety of materials is proposed to the varied house types to reflect the variety that is evident within the wider urban context of Halesworth. The Neighbourhood Plan provides some very good examples of the range of materials that characterise the town and it is considered that a reasonable and acceptable proportion of these is reflected in the materials choice for the development. Buff coloured brick are proposed to dwellings that line the northern, eastern and southern edges of the layout. Internal streetscenes are more varied with the use of red brick mixed in with the buff brick. Similarly, the buff brick houses to the outer edges of the layout are paired with black/grey pantiles - an attractive combination which also, importantly, acknowledges the strong local traditional of black pantiles (a feature in the northerly part of the District). Render is also introduced with the brick to add variety and relief to some streetscenes. The materials selected are therefore considered to be good and acceptable for the site.
- 6.30. Two main character areas have been designated. one arising from the development edges to the north, east and south, and the other, everything else (called here 'modern edge' and 'transitional centre'). They are used to denote modest differences in elevational treatments to house types (fenestration, materials) that will give rise to some differential characterisation. Such variation in character is welcome; and the application of a rationale to it is also welcome. The result will be that the development presents one kind of character along its main edges, which when crossed, will present another when inside the development. The medium scale of the development justifies the division of the layout into character areas; and the result will ensure that a uniform character across the entire site is avoided which is welcomed.
- 6.31. Overall, Officers consider that the proposed density of the development is acceptable and that the layout and design of the house types responds well to the location and characteristics of the site.

Landscape and Visual Impact

- 6.32. Paragraph 4.9 of the Local Plan states that although the site sits within the gap between Halesworth and Holton and is within tributary valley farmland landscape character area,

the fields comprising the eastern part of the site are well screened with mature vegetation which will limit the impact on the landscape and the potential for coalescence between Halesworth and Holton. Paragraph 4.11 states that the landscape in this location is sensitive to development. There is mature planting around the edges of the site which will need to be retained and enhanced to ensure there is only limited impact on the landscape.

- 6.33. As previously mentioned the attenuation basin is located in the eastern most part of the site and has also designed as a high quality functional open space, with an appropriate planting strategy to integrate it into the open space. A seating and incidental play area are planned in this area, along with walking routes which gives the area functionality for residents to use as open space. It also positively located adjacent the eastern boundary and open field beyond, as it creates additional space between the group of residential properties to the southeast off Bungay Road and will mitigate any visual change. The location of the attenuation basin will therefore help to provide a transition between the proposed houses and the open countryside to the east. The attenuation basin and main area of open are also adjacent to the public footpath that runs along the south eastern boundary of the site ensuring that the trees and hedges running alongside it will be retained. Detailed landscaping plans have been submitted which show that additional trees and plants will be planted within these areas.
- 6.34. For the reasons given, officers consider that the proposed development will not have any significant adverse landscape or visual impacts on the surrounding sensitive landscape of the tributary valley farmland landscape and that the proposal accords with the objectives of Policy WLP8.35 (Landscape Character) and it would accord with the visual effects anticipated and balanced into decision making at outline stage.

Flood Risk

- 6.35. The outline planning permission has conditions pertaining to surface water drainage which this application seeks to discharge. Condition 23 requires the submission of a surface water drainage strategy for the site; condition 24 requires details of the implementation, maintenance and management of the surface water drainage scheme and condition 26 requires a Construction Surface Water Management Plan. It is noted that surface water flooding does occur in the lower lying Bungay Road to the east and that some field drainage off this site contributes to that flooding. The proposed development will capture all run-off from this site, attenuate it and release it in a way which is controlled to avoid off-site flooding.
- 6.36. In considering the submitted details the Lead Local Flood Authority commented that it had worked closely with the consultant to produce an acceptable surface water drainage strategy however the information needed to be supported by detailed hydraulic calculations, and pollution mitigation calculations and until this was received was unable to recommend the discharge of conditions 23 and 26. Condition 24 is non-technical and not reliant on any other conditions and therefore was recommended to be discharged.
- 6.37. The applicant has submitted further details in respect of Conditions 23 and 26 and at the time of drafting the report the Lead Local Flood Authority's response is awaited. Their response will be included in the Update Report.

Ecology

- 6.38. Surveys of the site at the time of the Outline planning application (as presented in the Ecology Assessment, Hopkins Ecology, November 2018) recorded it as being of relatively low ecological value, albeit with a small number of protected species and UK Priority habitats and species recorded. These included hedgerows (a UK Priority habitat), an assemblage of foraging/commuting bats (with the site considered to be of "Local" value for individual bat species) and a small assemblage of breeding and wintering birds. Although nearly four years have passed the Council's Ecologist understands that the site has remained in a similar condition since 2018 (based on the information provided to support the Biodiversity Net Gain assessment (James Blake Associates, August 2022).
- 6.39. The habitats of greatest biodiversity value are considered to be the trees and hedgerows on and around the site, and the pond on the south-eastern boundary. On the eastern side of the site the majority of these are retained and incorporated into the open space and landscaping proposals. On the western boundary a hedgerow that was due to be removed is now proposed for retention and reinforcement planting in an amended plan which is welcomed. A hedgerow on the south western boundary is proposed to be removed (albeit with new planting proposed along part of its length) to accommodate the provision of a footpath connection. This footpath connection forms an important link to the neighbouring sports facilities site and therefore needs to be included as part of this development. Therefore, whilst the loss is regrettable, the justification is understood.
- 6.40. The Council's Ecologist has advised that sufficient information has been submitted to enable the discharge of conditions 28, 29 and 30 of the outline consent which require details of the design of green infrastructure within the site, a construction environmental management plan (CEMP) and a landscape and ecological management plan (LEMP) respectively. In addition an Ecological Enhancement Strategy has been submitted which includes the provision of bird boxes, swift bricks, bat boxes and hedgehog links in the proposed fencing.

Habitats Regulations Assessment (HRA)

- 6.41. The Outline planning application was subject to a Habitats Regulations Assessment (HRA) (Footprint Ecology for Waveney District Council, March 2019) prior to its determination, with the necessary mitigation measures (including a financial contribution to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)) secured as part of the Outline planning permission. A separate HRA (East Suffolk Council, September 2022) has been prepared as part of the consideration of the current Reserved Matters planning application and this concludes that subject to the implementation of the previously identified mitigation measures it can be concluded that the development will not result in adverse effects on the integrity of any European designated sites.

Heritage Considerations

- 6.42. There are no designated heritage assets that are buildings or structures within the application site. The site does not fall within the Halesworth or Holton Conservation Areas nor their setting. There is only one designated heritage asset that is a building that will be affected by this proposal for development within its setting, and that is the Grade II listed Town Farmhouse on Loampit Lane. There are no Non-Designated Heritage Assets that will be affected by the application proposal.

- 6.43. The Built Heritage Statement of 2018 for the outline consent has been resubmitted for this application and is considered by the Principal Design and Conservation Officer to be adequate for the purposes of Paragraph 194 of the NPPF.
- 6.44. The Heritage Statement highlights that the use of the site as an isolation hospital ceased by the 20th century, likely when the nearby Patrick Stead Hospital was constructed in the late 19th century. Nonetheless, the site retains considerable local historical interest for its long history in use as a pest house, one of the key criteria for which, of course, was its isolation from the main settlement.
- 6.45. The Principal Design and Conservation Officer considers that the loss of open agricultural land that currently forms a considerable part of the setting to Town Farmhouse and the erosion of part of its open setting will reduce the ability to appreciate and understand the origins and later use of the historic site as a farmhouse. He agrees with the Heritage Statement, however, that the geographical isolation of the site when in use as a pest house (for a considerable period) is related to the land between it and the town to the south and south-west, and that this does not include the application site. The proposed development would not, therefore, impinge upon an appreciation of the farmhouse when in use as a pest house.
- 6.46. It is judged that the loss of open agricultural land and erosion of open setting in part, will adversely impact the special interest of Town farmhouse, with the effect that its significance will be harmed. This harm will be indirect (from its setting, only) and is of a low level, as it is acknowledged that the layout design mitigates some of the impact of built form in the vicinity of the farmhouse (offset green space and single storey houses), and that the wider surroundings to the farmhouse have been, and are already being, altered in a similar way as here proposed. The Council has already considered and accepted the principle of residential development on the site within the setting of the listed building through the allocation in the Local Plan and the granting of outline consent. In considering the proposed layout officers consider that the harm to the significance of Town Farmhouse is limited to a low level of less than substantial harm. The relevant test of the NPPF at paragraph 202 is therefore engaged and the low level of harm that has been identified will have to be given great weight in the balance by the decision taker and weighed against the public benefits of the proposal.
- 6.47. The proposal forms part of a much wider allocation of the local plan and in addition to the delivery of 188 houses, including 56 affordable homes, will help enable the delivery of enhanced sports facilities to the local community. It is considered that these significant public benefits will outweigh the less than substantial harm to the setting of Town Farm that has been identified.

Contaminated Land

- 6.48. Condition 16 of the outline consent requires a site investigation for the presence of contamination and Condition 17 requires a detailed remediation method statement. Previous investigations have highlighted the presence of ground gas, however the investigation submitted with this application found no ground gas. The Council's Environmental Protection Officer is reviewing the conclusions of this report and the response will be included in the Update Report.

- 6.49. The Environmental Protection Officer has advised that the submitted Construction Management Plan is sufficient to enable the discharge of Condition 15 of the outline consent.

Sustainable Construction

- 6.50. A Sustainability Statement accompanies the application as required by Condition 33 of the outline consent. It sets down a strategy for reducing energy use and confirms that design stage SAP calculations will be conducted for each dwelling type by an accredited Assessor. The scheme will be designed with the aim to enhance the u-value throughout the scheme and exceed Part L of the Building Regulations April 2013. It further confirms that the development will incorporate a range of water efficiency measures to reduce the internal potable water consumption to less than 110 litres/person/day, equivalent to the water consumption level of Code for Sustainable Homes Level 4 rated dwellings.

Archaeology

- 6.51. Suffolk County Council Archaeological Service have confirmed that archaeological evaluation has been undertaken on this site which was negative for archaeology and that conditions 21 and 22 of the outline consent can be discharged.

Public Benefits of the Proposed Development

- 6.52. The proposed development will deliver significant public benefits including:
- 179 built dwellings in a sustainable location as part of the plan-led approach to growth in the District;
 - 9 plots to be made available for 'self-build' homes;
 - 56 of the homes will be affordable homes;
 - Economic benefit in the short-to-medium term through creation of jobs in the construction industry;
 - Long term benefit to facilities/services in Halesworth from new resident spend in the economy;
 - Substantial areas of open space and equipped play space for new and existing residents;
 - Connections to the existing public footpath alongside the site;
 - Improvements to Harrisons Lane, including new cycle/footpath along the site frontage
 - Pedestrian links to the adjacent Campus site and proposed sports facilities.
 - The outline consent of this site also provided for the transfer of land to Halesworth Campus for its new 3G Pitch.

7. Conclusion

- 7.1. In considering this application, attention has been paid to ensure the proposed layout responds to the characteristics of the site to ensure that it assimilates itself into the site well. Officers are of the view that the proposal accords with the housing element of allocation in the local plan under Policy WLP4.1 and will provide a high-quality residential development including, amongst other things, affordable housing, open space, good pedestrian connectivity to adjacent sites and an overall density that is appropriate for the site.

- 7.2. It is acknowledged that the proposal will transform the existing appearance of the site and that it is not supported by some local residents and the Town Council. However, the site is allocated under Policy WLP4.1 of the Local Plan for residential development as part of the Halesworth/Holton Healthy Neighbourhood and outline planning permission for up to 190 houses has been approved.
- 7.3. As set out above officers have given detailed consideration to the proposal and consider that it will deliver a high quality residential development in accordance with WLP4.1 and the design objectives of the Local Plan and the NPPF. It also accords with the outline masterplan and design principles previously established.
- 7.4. The proposal would give rise to a low level of less than substantial harm to the significance of the grade II listed Town Farmhouse. Great weight has been given to that harm but when weighed against the public benefits of the proposal officers are of the view that those benefits outweigh any harm that would arise.
- 7.5. As will be noted in paragraphs 6.14, 6.16, 6.37 and 6.48 above there are outstanding matters relating to highways, surface water drainage and contaminated land. Subject to these matters being satisfactorily addressed the application is recommended for approval. A consultation response from Holton Parish Council is also pending given half of the site is within Holton parish.

8. Recommendation

- 8.1. Authorisation to approve subject to the outstanding matters referred to in paragraph 7.5 above being resolved and subject to the following conditions.

Conditions:

1. The development hereby approved shall be begun within the time limits specified on the outline permission and is subject to any conditions imposed thereon.

Reason: In accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended)

2. The development hereby permitted shall be completed in all respects strictly in accordance with the following plans, for which permission is hereby granted or which are subsequently submitted to and approved by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority:

CONDITION 2:

237-20-0200 P8 Master Plan, 237-20-0301 P23 Accommodation Plan, 237-20-0351 P2 Open Space Plan, Soft Landscape Proposals - 21-234-SK01 Masterplan Rev C, Arboricultural Impact Assessment Issue A, 21-234-01 Rev C, 21-234-02 Rev C, 21-234-03 Rev C, 21-234-04 Rev C, 21-234-05 Rev C, 21-234-06 Rev B, 21-234-07 Rev B, 21-234-08 Rev B, 21-234-09 Rev B, 21-234-10 Rev B, 21-234-11 Rev B, 21-234-12 Rev B and HAR-SCH01 Rev A External finishes schedule
received 16 January 2023.

Design and Access Statement, 237-20-0150 P1 Site Location Plan, 237-20-0210 P7 Character Plan, 237-20-0353 P1 Vehicular Network Plan, 237-20-0354 P2 Pedestrian Network Plan, 237-20-0355 P2 Storey Heights Plan, 237-20-0356 P2 Dwelling Size Plan, 237-20-0357 P2 Phasing Plan, 237-20-0358 P2 Refuse and Bin Storage Plan, 237-20-0359 P2 Parking and Cycle Storage Strategy Plan, 237-20-0600 P5 Materials Plan, 237-20-6300 P3, 237-20-6301 P2, 237-20-6303 P3, 237-20-6304 P1, 237-20-6305 P1 - Starston Semi Detached House; 237-20-6302 P2 - Starston Terraced House, 237-20-6310 P2, 237-20-6311 P2 - Benacre Semi Detached Bungalow, 237-20-6320 P2, 237-20-6321 P2 - Hales Semi Detached House, 237-20-6330 P3, 237-20-6331 P3, 237-20-6332 P3 - Wangford Detached Bungalow, 237-20-6340 P2 - Haddiscoe Semi Detached House, 237-20-6350 P2 - Hulver Detached House, 237-20-6351 P2, 237-20-6352 P2 - Hulver Semi Detached House, 237-20-6360 P2, 237-20-6361P3 - Thurlton Detached House, 237-20-6370 P2, 237-20-6371 P2 Mettingham Detached House, 237-20-6380 P2, 237-20-6381 P3 - Ellingham Detached House, 237-20-6390 P3, 237-20-6391 P3, 237-20-6392 P1 - Redgrave Detached House, 237-20-6400 P2, 237-20-6401 P3 - Yoxford Detached House, 237-20-6410 P3, 237-20-6411 P2 - Glemham Detached House, 237-20-6421 P3 - Thorpe Detached House, 237-20-6431 P2 - Wrentham Detached House, 237-20-6441 P3 - Blythburgh Detached House, 237-20-6460 P3 - Affordable 2BH Terraced Bungalow, 237-20-6470 P3 - Affordable 2BH Terraced House, 237-20-6480 P3 - SO 2BH Semi Detached House, 237-20-6482 P3 - SO 2BH Terraced House, 237-20-6483 P3 - SO 2BH Terrace of 4, 237-20-6490 P3, 237-20-6491 P4 - 3B SO Semi Detached House, 237-20-6492 P3 - 3B SO Terraced House and 237-20-6500 P4 - 2B and 3B SO Terraced House received 8 August 2022.
237-20-6700 P14 Flat Block 20-27 and 237-20-6705 P2 Flat Block 28-35 received 16 March 2023.

CONDITIONS 5, 6, 7 23 and 24:

201485_C-100_P02 General arrangement and external works sheet 1,
201485_C-101_P02 General arrangement and external works sheet 2,
201485_C-102_P02 General arrangement and external works sheet 3,
201485_C-103_P03 General arrangement and external works sheet 4,
201485_C-104_P02 General arrangement and external works sheet 5,
201485_C-105_P02 General arrangement and external works sheet 6,
201485_C-106_P03 General arrangement and external works sheet 7,
201485_C-107_P02 General arrangement and external works sheet 8,
201485_C-108_P03 General arrangement and external works sheet 9,
201485_C-120_P03 General arrangement & external works s38 agreement plan sheet 1,
201485_C-121_P03 General arrangement & external works s38 agreement plan sheet 2,
201485_C-125_P02 General arrangement & external works S278 agreement plan,
201485_C-126_P02 General arrangement & external works S278 land dedication plan,
201485_C-130_P02 General arrangement & external works S104 agreement plan sheet 1,
201485_C-131_P03 General arrangement & external works S104 agreement plan sheet 2,
201485_C-132_P03 General arrangement & external works S104 agreement key plan,
201485_C-135_P03 General arrangement & external works impermeable area plan,
201485_C-140_P01 Off-site works to Loam Pit Lane,
201485_C-200_P01 Road and sewer setting out sheet 1,
201485_C-201_P01 Road and sewer setting out sheet 2,
201485_C-202_P01 Road and sewer setting out sheet 3,
201485_C-203_P01 Road and sewer setting out sheet 4,
201485_C-204_P01 Road and sewer setting out sheet 5,

201485_C-205_P01 Road and sewer setting out sheet 6,
201485_C-206_P01 Adoptable manhole schedules sheet 1,
201485_C-207_P01 Adoptable manhole schedules sheet 2,
201485_C-208_P01 Adoptable manhole schedules sheet 3,
201485_C-209_P01 Adoptable manhole schedules sheet 4,
201485_C-210_P01 Road and sewer long sections sheet 1,
201485_C-211_P01 Road and sewer long sections sheet 2,
201485_C-212_P01 Road and sewer long sections sheet 3,
201485_C-213_P01 Road and sewer long sections sheet 4,
201485_C-214_P01 Road and sewer long sections sheet 5,
201485_C-215_P01 Road and sewer long sections sheet 6,
201485_C-216_P01 Road and sewer long sections sheet 7,
201485_C-217_P01 Road and sewer long sections sheet 8,
201485_C-300_P01 Anglian Water Construction details sheet 1,
201485_C-301_P01 Anglian Water Construction details sheet 2,
201485_C-302_P01 Anglian Water Construction details sheet 3,
201485_C-400_P01 Suffolk Highway Construction Details S38 Works sheet 1,
201485_C-401_P01 Suffolk Highway Construction Details S38 Works sheet 2,
201485_C-402_P01 Suffolk Highway Construction Details S38 Works sheet 3,
201485_C-502_P02 Private construction details sheet 3,
201485_C-503_P01 Private construction details sheet 4,
201485_C-605_P01 Autotrack Swept Path,
Preliminary SuDS Management and Maintenance Plan
received 8 August 2022 and 16 January 2023.

CONDITION 10:
237-20-0359 Rev P2 received 8 August 2022.

CONDITION 15:
HAR-DOC-01 Rev B Harrisons Lane Construction Management Plan, received 16 January 2023.

CONDITION 16 and 17:
Create Consulting Engineers Phase 1 Contaminated Land Assessment Volume 1 of 2 and
Volume 2 of 2;
Ground Investigation (ASL Report No. 450-18-087-10 August 2019)
Supplementary Ground Investigation (ASL Report No. 450-18-087-06 January 2020)
Geo-Environmental and Geotechnical Site Investigation Report (Brown2Green Ref. 2954/Rpt
1v1 January 2022)
received 8 August 2022

CONDITIONS 21 and 22
Written Scheme of Investigation for an archaeological trial trench evaluation (MOLA 2019),
received 8 August 2022 and Archaeological trial trench evaluation (MOLA Report 19/99,
HWT 053), received 18 January 2023.

CONDITION 23:
Awaiting confirmation from LLFA

CONDITION 24:

SuDs Management and Maintenance Plan Rev 01 December 2022 received 16 January 2023.

CONDITION 26:

Awaiting confirmation from LLFA

CONDITION 27:

237-20-0313 P2 Sustainable Technology Plan received 16 January 2023.

CONDITION 28:

Homeowners Walking Routes Leaflet received 21 March 2023.

CONDITION 29:

Construction Environmental Management Plan (CEMP) for Biodiversity (JBA, July 2022) received 16 January 2023.

CONDITION 30:

Landscape and Ecological Management and Maintenance Plan (JBA 21/234-LEMP1 Rev A, December 2022) received 21 March 2023.

CONDITION 31:

Drawing Number NS/HARR/302504 received 8 September 2022.

CONDITION 32:

Design and Access Statement Appendix C received 8 August 2022.

CONDITION 33:

Sustainability Statement (Eden SAP Services 23 April 2022) received 8 August 2022.

CONDITION 34

Self-Build Design Code and Marketing Strategy Rev P3 received 14 March 2023.

3. Ecological enhancement measures will be delivered and retained in accordance with the Ecological Enhancement Strategy (JBA 21/234 November 2022) received 21 March 2023.

Reason: To ensure the development delivers ecological enhancements.

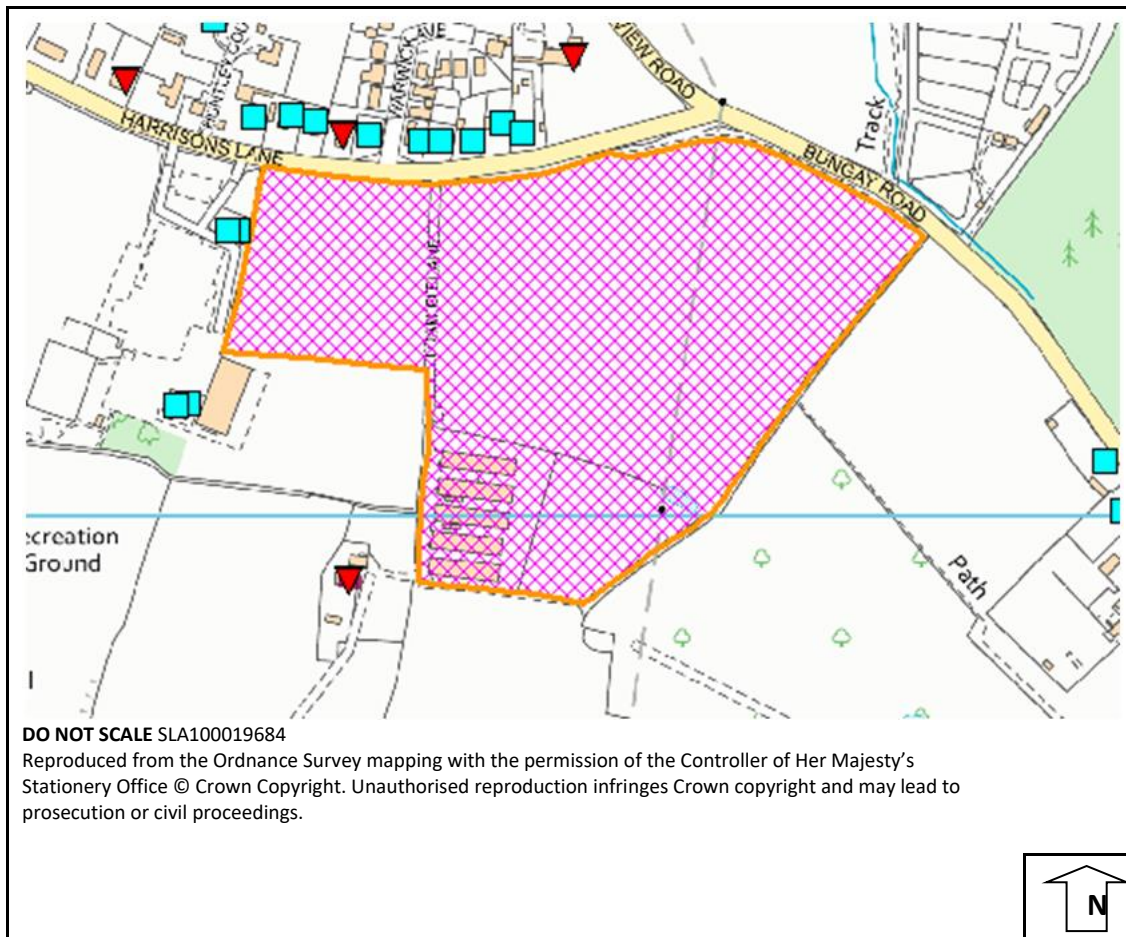
Informatives:

There are no informatives.

Background information

See application reference DC/22/3156/ARM on [Public Access](#)

Map



Key



Notified, no comments received



Objection



Representation



Support