

Response from Glebe Meadow Westleton CIC to the paper prepared by the Planning Dept for the Advisory Panel Meeting on Tuesday 7th April

The text of that paper is copied below. We have *highlighted some of the original text in red for points to note & our comments to the text are in blue.*

Planning Advisory Panel North (7 April 2020) Item 6 – DC/19/2839/FUL - Application for 20 new dwellings and change of use of one existing dwelling (The Vicarage) into a communal social hub at Glebe Meadow, Darsham Road, Westleton DC/19/2839/FUL

Application for 20 new dwellings and change of use of one existing dwelling (The Vicarage) into a communal social hub at Glebe Meadow, Darsham Road, Westleton Area Team: South Case Officer Liz Beighton

The application is at the Planning Advisory Panel because the ‘Minded to’ decision of the Planning Officer is contrary to the Westleton Parish Council recommendation to support the application.

Westleton Parish Council also submitted a copy of their most recent representations to the Local Plan process. A copy of that representation is included as Appendix 1.

Ward Members (Cllr Brooks) no comments received

Statutory Consultees: Historic England – please see appended response raising concerns to both the harm to the setting of heritage assets namely the conservation area and St Peters Church (Attached as Appendix 2)

SCC Archaeology – recommend conditions

Natural England – reference made to RAMS mitigation

Suffolk Wildlife Trust – object on insufficient information regarding compensation of loss to protected habitats

ESC Head of Environmental Services – recommend conditions

SCC Flooding – objection on grounds of insufficient information to confirm that there is a suitable drainage strategy

Non- Statutory Consultees

Suffolk Preservation Society – raise concerns over the impact to heritage assets *and “fully endorse the use of contemporary design, which places a high value upon creating a strong sense of place while respecting local distinctiveness, and the proposals to reuse the Vicarage Building.”*

Third Party Consultees - There have been **9 representations of Objection** received raising the following material planning considerations: - *By far the majority of these objectors live in or own properties that directly surround the site. There are 35 representations in favour of the scheme, from locals including the Chairs of local Parish Councils, the Bishop, the County Council, our local MP Therese Coffey, and Westleton Parish Council.*

Principle: This is inappropriate development, and the principle is contrary to planning policy as part of the site is outside the village boundary.

During the public consultation 3 years ago in relation to the village boundary there was broad support for the land to be outside the boundary. *We can see no evidence whatsoever of a public*

consultation 3 years ago about the boundary change – there is not even a Minute on the subject of village boundary changes in the Parish Council minutes. We would like to know who the Council consulted over the boundary change as it was certainly not the local public, the Parish Council nor the owners of the site, the Church of England.

Visual Amenity and Historic Environment - The proposal is inappropriate in a Conservation Area.

Believe that they are trying to get too many dwellings on this site, resulting in cramming within the site and properties being close to the existing neighbouring dwellings. [The proposed dwellings are well distributed over the site and the development is generally less dense than the existing urban pattern of Westleton.](#)

An estate of 20 modern houses crammed into a small plot of ancient land next to a thatched medieval church is completely inappropriate, and fail to complement the character of the area.

Landscape Impact – the buildings would be clearly visible across the field from Wash Lane and the roads from Yoxford and Darsham.

The proposed houses would be higher than the cottages in Darsham Road and overshadow the adjacent Listed church.

Loss of **Open Space** and resulting harm to the character of the area [This is a picture of the site from the public highway – Darsham Rd - taken on 31/3/20](#)



This would be an over development of the site. [Please see comment above regarding density of properties currently in Westleton.](#)

The archaeological investigations are incomplete. According to the results of a recent Archaeological survey, a Bronze Age cremation site was discovered within the Glebe land. This highlights the historical significance of the site which is adjacent to the churchyard where a Bronze Age urn was previously discovered. Also aware of archaeological deposits of other ages being found in the locality. [Nothing of major significance was discovered during the standard preliminary dig, but we agree that further investigations will be conducted prior to development](#)

Ecology The development would be harmful to protected species on the site, and an offence would be likely if the construction proceeded. The surveyors confirmed that a large population of slow worms inhabits the site, that eDNA results for newts were positive and that bats were active in the area. Many other species have been recorded in the area. [See below re Ecology](#)

Plans to remove the trees and hedgerows, and replace them with hedgerow are eco vandalism. They would result in a loss of habitat.

We agree with the ecology officer's comments in response to the ecological reports we commissioned, and further reports, mitigations and enhancements can be secured by appropriate conditions. Also, as there will be 20+ elderly people living on the site who are keen gardeners, bee-keepers, naturalists – we expect an increase in habitat from the raised beds & allotment on site

Concerns about the impact of external lighting upon ecology.

Social and community impacts - The creation of the vicarage as a social centre for the development will create an inward looking community within the village, which is at odds with the money recently spent on the village hall to create a social hub for the village. The Social Hub is for residents and will complement the community facilities at the Village Hall, which is less than 100 metres away. Unlike the Village Hall, it will be available informally around the clock to residents, with no need to book or pay.

Many older people live independently from choice with networks from within their very close neighbourhood. We agree, and these people are unlikely to want to participate in the scheme. Putting them together in one site in one village which is not disability enabled is unnatural and will place the burden of care on a few and lead to increased social isolation. The site is fully wheelchair accessible should residents need it. Residents must be capable of independent living, and the 'burden of care' will be dispersed amongst residents looking out for one another, community nurses able to treat several clients in one place/visit, and living socially for those who desire it will have substantial positive mental and physical health benefits.

Housing Tenure The proposals would not be affordable. Believe the development is aimed at wealth able bodied individuals, when the real need is for sheltered accommodation and low cost housing aimed at young families and elderly people who may require assisted living. ...proposed demographic appears to be the people who can generally afford the accommodation that is already available. Dismayed that only a small percentage of these buildings would be available for social housing. 80-85% would be open market, far in excess of the third permitted by policy. We agree that there is a real need for both affordable housing AND age appropriate social housing. As a Community Interest Company we do not need nor want to make a profit/surplus, so we will only sell as many homes as is needed to repay the debt we incur in buying the site, converting the vicarage to the Social Hub and building these homes. The remainder will be rented via a Housing Association in perpetuity to locals over 65 years old nominated by Suffolk County Council. Our budget indicates that 3-4 homes may be made available, but the budget has many assumptions and to obtain commercial funding for the scheme we need maximum flexibility which is why we cannot commit to this number.

Believe the homes that may be vacated by those downsizing to this development, would not be bought by local families and workers but by families and older people planning to retire here as second homes. Unfortunately we can't control this, we can only offer homes needed for downsizers (or 'rightsizers' as we prefer to call them).

Question the need for these homes, and the suitability of the housing needs survey, as it focused on collecting view on the concept of co-housing and potential future needs for elderly people with a response rate of only 26% (114 out of 424 questionnaires) not being a fair representation of endorsement from the local community. Also suggest the questions asked were leading. ? We believe a response rate of 26% is good, especially as many local people attended the open Public Consultation held in St Peters Church on 29 & 30th March 2019 and gave us their views informally then. See <http://www.glebemeadow.co.uk/the-plan/public-consultations/> Also please note villagers

had only recently completed another substantial housing needs survey for another project which has not come to fruition.



Highway Safety and Parking The road is narrow, so there are concerns regarding the additional traffic and parking requirements. Parking and driving on this small road with no pavements has been a long term problem. Many occupiers would have two cars and support traffic of family, cleaners, gardeners, home delivery trucks, events at the church and village hall, the pubs, will be chaotic and dangerous. As the site is within 100metres of the Church, village shop, tearoom, bookshops, pub, Westleton Crown etc we hope our residents will be 'weened' off their cars as soon as they have confidence in the on site car sharing scheme. Also please note that alternative sites identified in the emerging Local Plan for potential development are further from amenities on roads with no footpaths and no potential for such.

The developers have withdrawn their invitation to the parish council to collaborate on parking on the proposed site. Only because the planners required a high standard of 'evidence of need' for this contemplated public car parking allocation, and this evidence was not forthcoming.

Residential Amenity There would be a loss of privacy to adjacent properties through direct views from the scheme into their gardens. The proposed dwellings have the majority of their accommodation on their ground floors. From the rooms upstairs the strategy to protect privacy has been three-fold. 1: direct views away from neighbouring properties or high level rooflights that do not allow a view onto neighbouring properties. 2: allow sufficient space between the proposed dwellings and neighbouring properties. 3: incorporate screening. Plots 3-5 are over 25m away from Lavender cottage and there is a mature vegetation, an outbuilding and boundary walls in between the plots and the neighbouring cottage. Plots 1-2 are over 8m away from Flint cottage at their closest point. Their first floor windows are on the other side of the dwelling looking away from Flint cottage. There are only a couple of very high level rooflights on the Flint cottage side and these do not allow views onto the neighbouring property. The remaining plots are all quite some distance from neighbouring properties and their first floor windows are all directed away from those properties.

Concern there would be a loss of light to adjoining properties. Please see above regarding distance and orientation of dwellings. Please also note that this is the precise reason the dwellings have been designed as 1.5 storeys with their first floor in the roof space, dramatically reducing their mass.

The closest dwellings to any neighbouring properties are plots 1&2. These 2 plots are intentionally orientated so they present their low eaves towards the neighbouring property. Also the site of these 2 plots is where some of the proposed larger trees are to be removed. These larger trees are far taller and block more sunlight than the proposed dwellings ever will.

There would be increased noise and other pollution from traffic within the site to the rear of existing dwellings. [See response above re Highways](#)

Concerns about the impact of external lighting upon the existing neighbours.

Concerns about the position of bins and a proposed ground source heat pump in relation to the boundary with the neighbours, resulting in noise and vibration and foul smells.

Other matters - There is a need for clear transparency in terms of the funding and profits. There are no details on how this scheme would actually work in practice, and no mention was made of the high annual service charges covering the cost of running extensive communal services. [There will be no profit – this is a Community Interest Company ie social enterprise. Any surplus will be ploughed back into the site. The service charge level will be modest as energy will be generated by renewable sources and shared, and there will be no ‘extensive communal services’ unless the residents want them – they will own and run the CIC when the site is established.](#)

The buildings are not bungalows as suggested in the Design and Access Statement , as they would have accommodation on more than one floor with stairs. [‘Bungalow’ is the correct term: ‘a low house having only one storey or, in some cases, upper rooms set in the roof, typically with dormer windows.](#)

The ground floor is self contained and fully wheelchair accessible. The ½ storey for the second bedroom is for a spare room, storage, study, carers room etc. The response from our consultations and surveys overwhelmingly supports 2 bedrooms.

The scheme will introduce urbanisation, noise, light and traffic exhaust pollution.

Suggest that anyone interested in investing in the scheme must be a ‘high net worth’ individual (“net incomes in excess of £100k pa, or net assets in excess of £250k beyond your pension fund assets and your main private residence”). [? We don’t understand this objection as a planning issue.](#)

Foul sewage is already under strain.

Alternative sites in Westleton have already being identified by the Local Authority, which proposed via policies in the new local plan which include a requirement for dwellings to meet the needs of older people. [We do not believe these alternative sites meet the social needs of older people, and will reinforce feelings of isolation and loneliness as both sites are on the outer edge of the village and away from all central village services. Also please note our point above that these alternatives carry more danger to elderly pedestrians on roads with no footway](#)

The above representations of objection also raise a number of items that are not material to the determination of the application and therefore can not be considered in the determination of the application. These include the consultation process of Westleton Parish Council with the community, and the suggestion that the applicants have sent emails to those in the village [pleading](#) for people to support the scheme. [? emotive language. We send a regular e-newsletter advising of the situation regarding the scheme to anyone who has signed up for such](#)

There have been 35 representations of Support (including from the land owner, the County Councillor and members of the Community Interest Company who have submitted the application) received raising the following material planning considerations: -

Visual Amenity and Historic Environment The site is a private long neglected garden, therefore concerns regarding open space and conservation are misplaced. [This is a picture of the Glebe land behind the vicarage taken on 31/3/20 from the edge of the rear of the churchyard.](#) The current tenant is a collector of old cars, vans, boats and other misc engines -



Believe the buildings, whilst modern would be a counterpoint to the existing architecture and therefore would not be detrimental to the visual aesthetics of the church, churchyard or audibly.

The noise impacts from the elderly residents will surely be minimal.

The area is well wooded with existing mature vegetation between the site and the church. [Picture from the front of the Churchyard taken 31/3/20](#) –



Once established the homes will fit in well, echoing the groups of housing along various lanes in the village. [Picture of the front of the site from the Darsham Rd row of terrace houses](#)



The houses are sensitively designed and the proposal shows good use of the area around them for green spaces, recreation and wildlife.

Social and community Impacts - There would be social/community benefits of enabling older people to stay connected with their friends and the community, helping the village to develop its already strong sense of community.

The vicarage would provide a hub for community activity, helping to reduce social isolation and give a good quality of life.

The site is close to the heart of the village, with easy access to the church, the village hall, the shop, the bookshops, the pubs, and the green. [This is the critical reason for this choice of site and why the other 2 allotted sites in the village would not work – residents have to feel connected to the village and be able to walk to local amenities, not banished to the outside edges of the village.](#)

Believe the residents of co-housing schemes remain healthier longer putting less pressure on health services, and such schemes have inbuilt social care reducing intervention from local authorities. [This is why Suffolk County Council have supported this scheme with a significant loan to the CIC to enable us to get through the planning phase.](#)

Housing Tenure - The 1.5 storey dwellings will be suitable for those with limited mobility. There is a great need for this specialist housing in the area as all other housing plans are to benefit all including those wishing to buy as second homes or holiday lets. [Residents at Glebe Meadow will have to declare this as their full time residence, no second homes will be allowed.](#)

It would provide age appropriate bungalows for older local people, with intrinsic social support in the form of a co-housing community. Recent housing surveys have shown that there is an urgent need for the provision of age appropriate accommodation for older people. [It is proposed that the purchase of the homes would be limited to people who live in the district and are over 65.](#) The homes would alleviate concerns of older people such as security, emergency assistance and transport. It will bring affordable and social housing to the village. Believe this will free up other homes in the area which could be taken up by younger people and families, as older people downsize.

It will enable people who have left Westleton for work or other reasons to return to the village of their childhood in their old age.

Housing Construction The homes would be physically efficient, highly insulated and low maintenance. They would be constructed using sustainable materials, to 85% passive house standards, with extensive roof areas of Solar PV. [This will ensure running costs are low and fuel poverty is eliminated.](#)

Highway Safety and Parking - Other Matters. Acknowledge that there would be disruption during the construction phase, and visual imposition upon neighbours and the loss of current wildlife.

Acknowledge that not everyone will be able to afford the new homes.

Believe if this scheme is refused, the village would be less able to resist the proposed allocation to the southern side of the village. [This southern site allocation – which is currently entirely outside the village settlement boundary & has never been inside the boundary – is deeply unpopular locally and has a number of impediments that the Parish Council have outlined in their submission to the emerging Local Plan Examiner dated 23/09/19. The village accepts the need for new dwellings and 20 of the 35 allocated could be swiftly constructed on the Glebe site.](#)

The above representations of support also raise a number of items that are not material to the determination of the application and therefore can not be considered in the determination of the application. These include the length of time those commenting on the application have lived in the village/area and the characters of the applicants.

Officer comments - The Case Against the Development - Whilst the sentiment of the applicant is laudable, officers are firmly of the view that the site selected for the proposed development is unacceptable and alternative locations should be explored which do not yield the level of harm identified. The following issues are in the officer's mind significant and would be suggested reasons for refusal:

1. Harm to designated heritage assets of St Peter's Church and Lavender Cottage [The Bishop of Ipswich and St Edmundsbury has supported our application and therefore sees whatever harm to St Peter's Church as being outweighed by the significant community benefits of the scheme.](#)
2. Loss of important open space identified in the CA appraisal and the resulting harm to the defined heritage asset [We will demonstrate that the space is not 'open' and that the scheme will enhance the conservation area and enjoyment of the heritage assets, including the vicarage.](#)
3. The site is located ([partly](#)) outside the settlement boundary and does not meet the exceptions to allow housing identified in para 79 of the NPPF or Policy DM3 of the Local Plan. [We are confused about this objection as para79 specifically mentions isolated homes - "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:..."](#)
4. Insufficient information has been provided to satisfy the Local Lead Flood Authority that suitable drainage of the site can be achieved
5. Objection from the Councils Arboriculturist over the [future pressure to fell trees](#)
6. The scheme represents poor layout and design which does not respect its setting or character of the area and is contrary to design guidance in the NPPF. [We disagree, see below](#)

7. There is no suitable mechanism through an appropriate legal agreement to ensure that the dwellings remain for local people (as was the intention) and as such, with the **very open cascade** proposed, amount to new market dwelling. **No affordable housing is proposed on grounds of viability. As such there is no public benefit arising from this development.** 1) the cascade is heavily weighted towards locals as this is our target but we have to retain the ability to promote the scheme wider if insufficient numbers of locals do not apply to buy these homes 2) there is huge public benefit arising from this development which will be unique in the UK – but probably not for long! Please see comments above re the affordable housing issue.

8. Inappropriate mix of housing to satisfy Policy SP3 of the Local Plan. **For our target demographic this is the most appropriate size and type of home, and was overwhelmingly endorsed during our local Housing Needs Survey.**

It is important to note that detailed pre-application guidance was provided to the applicants following a site inspection. The formal advise raised a number of key concerns. Unfortunately despite such significant concerns an application was submitted with limited deviation and therefore the concerns of officers remains and is consistent with that previously provided.

Officers acknowledge the intention and ambition of the CIC and would be amenable to working with **the team in terms of finding a suitable site in the district / area to realise these ambitions. An alternative would be for the CIC to investigate one of the allocated sites to proceed with this development which are sites considered suitable for this level of development to the council.** This is the only appropriate site for a scheme of this nature – it must be at the heart of the village, not the periphery. Below is an aerial photograph of the site, which is outlined in red, with (from left to right), circled in blue – the Church, pub, garage, village hall, village green, Westleton Crown, bookshop, the shop and the tearoom. ie all the village amenities are within easy walking distance (100m) of the site.



This is not an issue solely of convenience; residents at Glebe Meadow can reach all of these facilities on footways. None of the alternative sites can offer this, all require walking on roadways which are not lit after dark.

The limited benefits of the scheme do not outweigh the significant harms identified to the proposal, most importantly impact on heritage asserts and being contrary to the existing and emerging local plan (and NPPF). The harms are supported not just by officers but also statutory consultees who hold expertise in such matters.

Site Description The application site lies **partly in and partly outside the defined settlement boundary of Westleton as defined in the Local Plan (2013).** Please note the site was **entirely** within the settlement boundary until the Site Allocations and Area Specific Policies Development Plan Document Adopted - January 2017

The emerging local plan, which has been through examination and consultation with the Parish Council does not propose to alter the settlement boundary therefore resulting in the site remaining outside the boundary. The emerging local plan DOES propose to alter the settlement boundary as neither of the two sites identified for residential development SPLP12.70 & SCLP 12.69 are within the current settlement boundary

Two sites have been identified for residential development (SPLP12.70 and SCLP12.69) which between them would deliver approximately 35 dwellings. The whole of the site is located within the Conservation Area (June 2010) and the whole of the site is identified as an important open/green/tree space. The site forms the setting of two heritage assets – St Peter’s Church (Grade 2*) and Lavender Cottage (Grade 2). Proposals

The application is for 20 new dwellings and the change of use of the existing dwelling to provide a communal social hub. According to the Housing Policy Statement submitted with the application, the scheme would provide 20 two bedroom dwellings which are described as being selfbuild properties. The Design and Access Statement states that the dwellings will all be wheelchair accessible at ground floor level and would be targeted to the over 65s as a co-housing scheme.

Planning Policy S38(6) of the Planning and Compensation Act states that decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The emerging Local Plan has not been adopted and therefore the previous Local Plan of 2013 is still relevant. The site was entirely within the village settlement boundary at that time.

S66(1) Planning (Listed Building and Conservation Areas) Act 1990 National Planning Policy Framework 2019 Core Strategy and Development Management Policies Development Plan Document (2013) • Policy SP3 – New Homes • Policy SP19 – Settlement Policy • Policy SP27 – Key Service Centres • Policy DM3 – Housing in the Countryside Site Allocations and Area Specific Policies Development Plan Document (2017) • SSP2 – Physical Limits Boundaries Emerging Local Plan • Policy SCLP3.2 – Settlement Hierarchy • Policy SCLP3.3 – Settlement Boundaries • Policy SCLP5.2 – Housing Development in Small Villages • Policy SCLP5.3 – Housing in the Countryside • Policy SCLP5.8 – Housing Mix There is no relevant Neighbourhood Plan covering Westleton.

Planning Considerations –

Planning Policy - Within the Core Strategy and Development Management Policies (2013), Westleton is identified as a Key Service Centre under Policy SP19 ‘Settlement Policy’. Policy SP27 ‘Key and Local Service Centres’ sets out the overarching approach towards development within Key Service Centres. In relation to new housing development criterion b states that housing development would be permitted within defined physical limits or in the form of small allocations of a scale appropriate to the size, location and characteristics of the particular community. Physical Limits are identified within the Site Allocations and Area Specific Policies Development Plan Document Policy SSP2 ‘Physical Limits Boundaries’. The Policies Map for Westleton (in Appendix 6a) defines the Physical Limits Boundary, which identifies that the eastern part of the application site is within the Physical Limits whilst the western part (which would accommodate 15 of the proposed dwellings) is outside.

In the context of Policy SP27, the site is not identified as an allocation. It is therefore relevant to consider policy related to housing development in the countryside. Policy DM3 ‘Housing in the Countryside’ of the 2013 Core Strategy sets out the circumstances under which housing development within the countryside would be supported in principle, which is relevant as part of the site is outside of the Physical Limits and is therefore within the countryside. The western part of the

site, the Glebe land, is the rear garden of the vicarage and is surrounded by buildings on three sides so in practical terms it could not be described as 'countryside'.

Policy DM3 sets out a framework under which proposals for replacement dwellings, sub-division, conversions and minor infilling within clusters of dwellings would be supported in principle. The proposal is not considered represent any of these. Policy DM3 also sets out support for affordable housing on 'exception' sites, however as the application is not for affordable housing it would not fall within the type of development supported. Policy DM3 also provides support in principle for development which would otherwise accord with the special circumstances outlined in Paragraph 55 of the NPPF. Paragraph 55 of the NPPF has subsequently been replaced by the equivalent paragraph 79 in the current 2019 NPPF. The proposal is not considered to represent any of the circumstances set out under paragraph 79.

Policy SP3 'New Homes' of the 2013 Core Strategy states that the strategy will be to increase the stock of housing to provide for a **full range of size, type and tenure of accommodation to meet the needs of the existing and future population**. The Policy goes on to state that this includes providing housing that will encourage and enable younger people to remain in the district, but **also addresses the needs of what is a currently ageing population**. **We believe this scheme truly addresses the future needs of a small rural village with an aging population, offering a sustainable and energy efficient community housing development.**

Paragraph 3.49 explains that the general starting point will be that housing developments of 5 or more units would be expected to provide a mix of house types and tenures. Notwithstanding that the principle of the proposal would be contrary to policy in this location, in this context it is noted that the application proposes 20 two bedroom dwellings, rather than a mix as expected by the policy. The Examiner in his draft review of the (Suffolk Coastal) emerging Local Plan in January 2020 notes that there is **no specific housing policy addressing the needs of the elderly, despite the dramatic projected increase in the numbers of over 65 year olds living in the region over the plan period (which is up to 2036).** He recommends 'The Plan should be clear in what it is seeking to deliver in terms of housing for older people and should be amended accordingly...The Policy and supporting text should be amended to set out how the housing needs of older people will be addressed through the provision of housing and **to boost the supply of this type of housing**'. He also recommends that the Councils stance on 'housing mix' ie the different types of property size on one development, should be more flexible and responsive to local need.

Under Policy DM2 'Affordable Housing on Residential Sites', and later revisions to the National Planning Policy Framework in respect of thresholds for provision of affordable housing, a development of ten dwellings or more would be expected to provide 1 in 3 units as affordable units on-site. It is noted that an Economic Viability Assessment has been submitted – **and independently reviewed at our cost by BNP Paribas who the Planning Dept commissioned** - which concludes that provision of affordable housing would not be viable, however it is expected that this will be assessed in determining the application. Notwithstanding that the principle of the proposal would be contrary to policy in this location, the lack of affordable housing would represent a conflict with policy DM2.

The emerging Suffolk Coastal Local Plan has reached an advanced stage of its preparation, with the Final Draft Local Plan (January 2019) having been submitted for Examination in March 2019. The Examination is currently underway with hearing sessions having recently been carried out in August and September 2019. In this respect it should be noted that the weight to be attached to the emerging policies is reduced due to outstanding representations. **Please see our comments above regarding the Examiners comments on the lack of policies regarding provision of housing for elderly people. The Examiner, in his email entitled 'Suffolk Coastal Plans Post Hearings Letter' to the Council dated 31/1/20, states categorically " the Plan should be altered to state the number of units of**

specialist housing required for older people for the plan period.”

Within the emerging Local Plan, Westleton is identified as a Small Village (Policy SCLP3.2 ‘Settlement Hierarchy’). The strategy for the new Local Plan (set out under Policy SCLP3.1 ‘Strategy for Growth in Suffolk Coastal District’) includes for appropriate growth in rural areas that will help to support and sustain existing communities. The Council has sought to allocate appropriate sites in Large Villages and Small Villages to take forward this element of the strategy and to contribute towards meeting the housing need for the district over the plan period. Policy SCLP3.3 of the Final Draft Local Plan sets out that Settlement Boundaries are defined on the Policies Map and that land outside of Settlement Boundaries is defined as Countryside. **Whilst there are outstanding representations to this Policy**, which would reduce the amount of weight that can be applied currently (albeit that these do not relate specifically to Westleton), on the Policies Map the Settlement Boundary for Westleton remains as in the Site Allocations and Areas Specific Policies (2017) in relation to the land covered by this site, which would remain partly within and partly outside of the Settlement Boundary. [See Examiners comments above, and see report dated 23/08/19 for Westleton Parish Council’s submission to the Examiner which objects to the proposed extension of the Settlement Boundary to enable a Site Allocation on the edge of the village to proceed, and instead recommends our site as the preferred site of 4 sites currently under consideration in the village.](#)

Policy SCLP5.3 ‘Housing Development in the Countryside’ of the Final Draft Local Plan sets out the circumstances under which housing development outside of Settlement Boundaries would be supported in principle. The proposal is not considered to represent any of the circumstances presented by Policy SCLP5.3. [See Examiners comments above.](#)

Similar to adopted Policy DM3, the policy refers to the circumstances set out in the NPPF, which have been discussed above. The emerging Local Plan has been informed by a Strategic Housing Market Assessment (SHMA) which identifies the needs for housing to meet the needs of different groups. This sits within the context of the NPPF paragraph 61 which sets out the groups that should be reflected in needs assessments and planning policies = [para 61 ‘Delivering a sufficient supply of homes’ = Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies \(including, but not limited to, those who require affordable housing, families with children, older people... \)](#)

The conclusions of the SHMA are described in the supporting text to Policy SCLP5.8 ‘Housing Mix’ in the Final Draft Local Plan. The supporting text to Policy SCLP5.8 recognises that there is a need to ensure that the right size, type and tenure mix of housing is delivered, including to meet the needs of older people. Policy SCLP5.8 states that proposals for 5 or more dwellings should provide for a mix of housing based upon the outputs of the SHMA set out in table 5.1, and should provide at least 40% as one or two bedroom units. [See Examiners comments above.](#)

For proposals of ten or more dwellings, at least 50% of dwellings should meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations. The policy also sets out support for sheltered and extra care housing where this incorporates a mix of tenures and sizes to meet an identified need. The above policy would apply alongside policies related to the principle of housing as described above, and would provide opportunities for housing to meet the needs of older people to be provided through the delivery of the Local Plan. [The site, the social hub and all the dwellings at Glebe Meadow will be entirely wheelchair accessible throughout \(standard M4\(3\), without requiring any adaption, which is far higher standard than Part M4\(2\), and will ensure residents do not become isolated as they become less mobile.](#)

The emerging Local Plan also includes Policy SCLP5.9 'Self Build and Custom Build Housing' which sets out support for self-build and custom build dwellings where these are in compliance with other policies in the Plan. Whilst it is not clear through the documentation submitted how the proposals would be constructed as self-build units, this policy would need to be viewed in the context of the proposal being contrary to other policies related to the principle of housing development.

Whilst not directly relevant to the consideration of this application, the Final Draft Local Plan sets out two allocations for Westleton, under Policy SCLP12.69 'Land West of the B1125', Westleton and Policy SCLP12.70 'Land at Cherry Lee, Darsham Road, Westleton'. These allocations are for the delivery of approximately 20 and 15 dwellings, respectively. Criterion a) of Policy SCLP12.69 would expect that development would provide a mix of dwellings to include dwellings to meet the needs of older people, and both allocations would be expected to comply with Policy SCLP5.8 'Housing Mix'.

There are outstanding representations related to these allocations, which would limit the amount of weight which can be attached to them, under paragraph 48 of the NPPF and some of these representations refer to the potential for the site subject to this application to come forward and associated cumulative impacts of growth. In this respect it should be noted that the Inspector conducting the Examination has stated that he will not be considering the merits or otherwise of 'omission sites' (as set out in his Guidance Note) and that, for information, the site subject of this application has not specifically been promoted for allocation through the Local Plan process. The applicant has stated in their submitted Design and Access Statement that the site is a more popular local option than the site situated on the southern edge of the village (SCLP12.69) which is also outside the settlement boundary and currently used for agricultural purposes. There is no evidence to support this claim, notwithstanding such, it is important to note that the 12.69 site is proposed for allocation. Please see Westleton Parish Council's objection to SCLP12.69 and support for Glebe Meadow contained in their submission to the Examiner dated 23/08/19 as clear evidence

In terms of the policy position the proposal would be contrary to both adopted and emerging planning policy through representing development of housing in the countryside that does not accord with adopted or emerging policy or with the National Planning Policy Framework, as set out above. The adopted and emerging Local Plans set out policies and allocations to meet District wide needs for housing, and the Council can demonstrate a 7.03 year supply of land for housing (for the former Suffolk Coastal district area) as set out in the Statement of Housing Land Supply (August 2019). The Council's planning policy team have reviewed the application and have raised these objections. It is further noted, notwithstanding that the principle of the proposal is contrary to policy, that the mix of housing proposed does not meet the requirements of adopted Policy SP3 'New Homes' (or emerging Policy SCLP5.8 'Housing Mix') in that it doesn't provide a mix of house types, noting that all the proposed units would be two bedroom.

Further, the proposal does not meet the requirements of Policy DM2 'Affordable Housing on Residential Development' (or emerging policy SCLP5.10) in that no affordable housing provision is proposed as part of the development.

It should be noted that this response has focused on the principle of the proposed development and the provisions of housing policies in this respect, and does not provide comment beyond these policies.

Both the NPPF and the council's local plan allow for development outside village boundaries in certain circumstances. The proposal meets said circumstances for the reasons described in Appendix C_Housing Policy Statement. In brief the policies of particular relevance are:

a) NPPF Paragraph 77 – “Planning policies and decisions should be responsive to local circumstances and support developments that reflect local needs”

i) A housing needs survey & report (see Appendix A and A(i)) has been commissioned and submitted along with the application. The report clearly shows the local need for the proposed scheme (over and above that which will be provided for by other local site allocations as identified in the emerging local plan)

ii) There is clear public support of the proposal as evidenced by the number and range of supportive comments

iii) The Parish Council are in full support of the scheme. Further to this they commissioned a professional report relating to the emerging Local Plan which strongly supports the proposed scheme over and above the site allocations being put forth in the emerging local plan. This report was uploaded to the documents list for this application on 23/08/2019 under the title ‘Town/Parish Consultation Response’. There is clear Parish support for the proposal.

b) NPPF Paragraph 78 – “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”.

i) The proposal will clearly help maintain the vitality of Westleton and will support its existing services.

ii) It will also enhance the village’s vitality by opening up the site’s frontage to the highway and reveal the vicarage, returning it to the focal point it once was.

iii) The Bishop of St Edmundsbury & Ipswich has made written representation to the council (uploaded to the case file on 13/01/2020) expressing his enthusiasm and support for the scheme which he says will help rural villages such as Westleton ‘to retain a cross-section of all age groups and allow older residents to continue making their contribution to village life’

c) The Government Guidance for Councils in preparing planning policies for older and disabled people issued on 26th June 2019 highlights the critical need for Councils to ‘offer older people a better choice of accommodation to suit their changing needs (which) can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ This is exactly what Glebe Meadow offers.

Heritage Considerations The Vicarage grounds are described as an important green, open treed space in the Conservation Area Appraisal and all three elements of this description will be markedly compromised with both direct loss and potential embedded tree damage.

This proposal will bring the developed edge of the village adjacent to open countryside with the only suggested visual impact mitigation in the form of a hedge to be kept at 1m. height along the western site boundary. This is a sensitive edge to the settlement as it fronts open countryside that slopes away down to Wash Lane which is a public right of way. Unless adequate mitigation for these anticipated impacts can be demonstrated, there is an objection to landscape character and harm and loss of trees.

The application site forms the grounds of the Grade 2* listed church and is also within the Conservation Area. Historic England (HE) advise that developing the site would remove this **open** area, occupy the historic setting of the vicarage and introduce **new building which would be visible from the churchyard in the winter** and in views of the church at the village edge. HE consider that developing the site has the potential to harm the historic significance of both church and conservation area and would not preserve those elements of setting that make a positive

contribution to the heritage assets and better reveal their significance in terms of paragraph 193 of the NPPF. The council has therefore weighed up the public benefits of the proposal as the NPPF requires, but given the other significant harms identified with the proposal, remain of the view that the harm identified to the heritage assets is not outweighed by any limited benefit. You will note that HE raise concerns over the application.

We note the comments from Historic England and the Suffolk Preservation Society (SPS). The SPS have identified the level of harm as 'less than substantial'.

Both the SPS's and Historic England's comments are based on the principal of development on the site and do not make comment on how the design of the dwellings and the master-planning impact the heritage assets.

We commissioned a Heritage Impact Assessment produced by local Bob Kindred which provides a comprehensive analysis of the proposal's impact on the surrounding heritage assets. The report agrees with the SPS that the proposal will cause a low level of less than substantial harm to the setting of the Grade II* Listed Church. It concluded that this harm is reduced as *"a consequence of the site layout, orientation and scale of the proposed residential units and the existing and proposed landscaping"*

The former vicarage is identified as a building that makes a positive contribution to the Westleton conservation area in our adopted appraisal (revised 2019). The appraisal suggests that the two-storey building is likely of two phases which has credence – in our view, C18th and C19th. **The building contributes importantly to the village due to its historical connection to the parish church and its attractive architectural attributes** which include its 'composition of contrasts', as the appraisal puts it, its reasonable scale and the Italianate character of the later phase. It has no identified designer. **Our design celebrates the vicarage building by opening-up the frontage and creating a central avenue up to the building, and by providing an open and inviting pedestrian link to the village, which is currently missing.** The building is currently entirely invisible to the village due to the high hedge fronting onto Darsham Road and the hedges at the front of the Churchyard – see pictures above. The building is currently in a state of neglect and disrepair – see below



The vicarage garden as its surroundings do contribute importantly to the significance of the vicarage and this will be substantially altered by the current proposal and to its detriment. The vicarage garden is currently a car park for old vehicles and is not a community asset



The repurposing of the vicarage as a kind of 'common house', as styled in the application, that includes communal facilities, residents' guest's accommodation and manager's rooms is appropriate and will facilitate the repair of the building which is welcome. The proposed layout will better reveal the significance of the vicarage by facilitating public views to it from Darsham Road and this is welcome. The proposal will cause less than substantial harm to the designated heritage asset that is the Westleton conservation area. That is because the area of land proposed for development is identified in our adopted conservation area appraisal as Important Open/Green/Tree Space i.e. the vicarage gardens and the glebe land. This means that the space makes a positive contribution to the character and appearance of the conservation area in its undeveloped form. The gardens also form an important open space within this part of the village when considered in conjunction with the churchyard to St Peter's. Development, in principle, will undermine that contribution and cause harm to the conservation area. The principle of development in this regard is therefore unacceptable. We appreciate and understand the principles but please see pictures above for the realities.

This application will fail the statutory duty to pay special attention to the desirability of preserving or enhancing the **Westleton conservation area**; and will cause less than substantial harm to the designated heritage asset that is the Westleton conservation area. The test at paragraph 196 of the NPPF is duly engaged and we do not believe, as stated previously, that the public benefits of the proposal against the less than substantial harm. The total loss of the historic glebe land and setting to the vicarage will result in harm to the significance of the church from development within its setting. The seasonal screening between the vicarage site and the churchyard will offer inadequate visual mitigation between the site albeit that the site layout intentionally places the open space adjacent the boundary with the churchyard to retain some degree of visual and spatial continuity. The built form will come close to this boundary in two places partly consisting of residential gardens and I do question whether the impact of residential activities including garden use and vehicle noise will adversely impact on the peaceful experience of the churchyard that can presently be enjoyed, to its detriment. We believe that, in contrast to the site's current state, the Glebe Meadow scheme will create a variety of high quality green open spaces within the development which will be enjoyed by a larger amount of people including the residents themselves, visitors to the site and those walking along the Darsham Road. It will positively contribute to the conservation area and people's enjoyment of it, as expressed in the HIA Section 5.31 to 5.38. In particular it notes that the site and the vicarage is currently concealed behind a dense frontage of foliage. The existing 'openness' of the site can therefore not be discerned from any publicly accessible point. The development proposes to

open up this frontage to reveal the vicarage to public view. The centre of the approach to the site is purposefully kept open with housing down either flank to promote the importance of the vicarage at its centre and to provide a truly open area of green space in the foreground and along the route to the vicarage. The report concludes that *“it is therefore considered that in relation to the character and appearance of the conservation area in general and the specific character when seen from the public realm in Darsham Road, the proposals would have no material detrimental impact on the character and appearance of the conservation area”*.

Paragraph 5.38 continues to say: *“The scheme would have the potential to better reveal the significance of the site and raise the standard of design of small rural residential buildings for local people of more advanced age, in line with the objectives of both Section 12 and Section 16 of the NPPF [02-2019] and also in meeting the objectives of the Framework more widely.”*

The proposal will fail the statutory duty to have special regard to the **desirability of preserving the setting of listed buildings**; and will cause less than substantial harm to the significance of St Peter’s Church. The test at paragraph 196 of the NPPF is duly engaged and you will need to weigh the public benefits of the proposal against the less than substantial harm. [Please also consider that the Church of England are highly supportive of this scheme and see it as a possible model for converting other redundant church assets into community use.](#)

The NPPF at paragraph 193 states that, when considering the impact of a proposed development on the significance of a designated heritage asset (this applies to the conservation area and the listed church), great weight should be given to the asset’s conservation. The more important the asset – the church is listed at Grade II* and is within the top 8% of all listed buildings – the greater the weight should be. Paragraph 194 goes on to state that any harm to the significance of a designated heritage asset should require clear and convincing justification. Further, [paragraph 200 states that LPAs should look for opportunities for new development within conservation areas and the setting of heritage assets to enhance or better reveal their significance](#). Proposals that preserve those elements of the setting that make a positive contribution to the asset should be treated favourably. In our view, the converse, therefore, applies, and the harm caused to the significance of the church by the development of 20 new dwellings within that part of the setting – the Vicarage garden and glebe land – that makes a positive contribution to the church should be resisted.

[Please see para 4.47- 4.53 of the Heritage Impact Assessment – It notes the ‘council has identified the former Vicarage within the site as making a contribution to Westleton notwithstanding its present almost complete seclusion from the road, the churchyard and surrounding public footpaths’.](#) It provides a description of the building which is not listed but can be considered of local importance and identifies the fact that the proposal will reveal this asset to the village by opening up the street frontage -

[‘The former Vicarage is to be retained on the site and is intended to be a central focal point and social hub of the residents. An existing, large red brick and pantiled potting shed to the north of the Vicarage is also to be retained and converted to ancillary artistic uses and as a plant potting shed for the site. Large trees that appear to have been extant in the late 19th century are also to be retained as set out in Sections 2.6 and 2.9.1 of the Design & Access Statement.’](#)

[In section 5.34 of the HIA it is also noted that “In paragraph 202, the NPPF recommends that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the dis-benefits of departing from those policies. It is](#)

[considered that the proposed change of use and refurbishment of the Vicarage and its immediate curtilage would support that objective."](#)

Ecological Matters The site supports a range of protected and/or UK priority species. The scheme will result in the loss of the majority of the habitats that support these species. Appropriate mitigation will therefore be required. **The Councils ecologist has accepted the conclusion of the surveys and proposes appropriate conditions.** It is however noted that the RAMS contribution has been received. This does not overcome the on-site harm resulting and mitigation required to alleviate any harm.

Landscape and Arboriculture In September of 2019 the Council's Landscape and Arboricultural Manager responded to the initial version of the tree survey as follows: "In respect of this application, I was also in attendance at the pre-application site visit with our colleagues Katherine Scott and Robert Scrimgeour, and on that occasion I had the opportunity to assess the site and understand its existing tree and hedge cover, and its place in the local landscape. Having now reviewed the application details including the submitted tree survey, I must advise you that I have some notable concerns regarding impacts arising on existing tree cover, together with other landscape character related issues. In summary my concerns are: * As a point of detail the tree survey states that the site is not in a Conservation Area, which of course it is so all trees over 75mm. DBH are protected by virtue of Section 211 of the Town and Country Planning Act unless their notified removal is accepted by the local planning authority. A number of trees are proposed for removal as part of this proposal. * The submitted tree report schedule of trees appears to be partially missing from the documents I have access to in so far as the shown schedule stops at T39 and the tree plan shows T numbers exceeding 50 together with hedges and groups. A full understanding of the detail will not be possible without all the required information. *

A total of 23 trees are shown for removal which is almost half the tree stock on or immediately adjacent to the site. This includes the major mature Lime that currently stands close to the rear of the Vicarage. I will accept that it is not in an ideal juxtaposition with the building, and it is also close to the fine mature Plane tree and it could be argued that there may not be room for both to exist so close to each other in future years. A further 16 trees are described as being affected by the proposal although this assessment was based on an early site layout that has now been superseded.

Working off the current layout plan, it is clear that a number of key trees, whilst shown for retention, will directly affected by surrounding development within their anticipated root zones and in the absence of any arboricultural implications and mitigation information, I can only make a general comment on this issue. Essentially, unless it can be demonstrated that the proposed site layout can be achieved without causing significant harm to retained trees (through specialist construction methods) the proposal has to be regarded as unacceptable. The Vicarage grounds are described as an important green, open treed space in the Conservation Area Appraisal and all three elements of this description will be markedly compromised with both direct loss and potential embedded tree damage.

Noting the proposed loss of trees and potential risk to retained trees, only indicative new planting is shown and it is not possible to make a full assessment as to whether this will compensate for the loss of trees and scrub.

This proposal will bring the developed edge of the village adjacent to open countryside with the only suggested visual impact mitigation in the form of a hedge to be kept at 1m. height along the western site boundary. This is a sensitive edge to the settlement as it fronts open countryside that slopes

away down to Wash Lane which is a public right of way. In the absence of more comprehensive information relating to arboricultural impact assessment and mitigation, and tree, hedge and scrub loss mitigation both in relation to impact on landscape character and habitat loss (although I note a nominal list of potential new planting has been submitted), I cannot give a more comprehensive response. Unless adequate mitigation for these anticipated impacts can be demonstrated, I cannot support the application.” The revised survey document does now correctly note that the site does fall within the Westleton Conservation Area, and the full tree schedule is now included.

Specific points of note arising from reading the report are: Para 5.2 notes that remedial tree surgery should be carried out following completion of construction works, and should include remedial work to any trees damaged during construction. This is not normally the best practice sequence of events. Any remedial tree surgery should be done prior to construction when the site is freely accessible. There shouldn't be any damage to trees during construction if the correct tree protection measures have been installed. The impact of trees on construction should be part of the arboricultural implications assessment and any anticipated harm to trees should be planned out of the process. This is more properly anticipated in Para 6.1. Geosphere Environmental's letter of 6th January 2020 to Matt Bell (Ref: 4537,ARLtr001-RF,KML-06.01.20-V2) seems to include an update on conclusions to the original report, as well as revised schedule of tree removals, although it is largely of the same order of magnitude as previously submitted. Para 4.2 includes the same proposal for post construction remedial pruning as previous para 5.2 (see above). Para 4.4 contains the following statement - **Buildings within the root protection area will be constructed with a lightweight timber frame using natural materials.** Where building footprints are shown to encroach into RPAs, they don't seem to be of a different building type to the rest of the proposed development so officers are not at all sure how they can suddenly switch to being lightweight timber frame construction, and officers are also not at all sure what 'natural materials' means in this context. If the development is approved, this point will need a lot more clarification of detail.

The 6th January letter/report includes a suite of plans that show the extent of tree removals, the extent of RPAs, and an overlay with the proposed development layout. **Whilst I welcome the retention of as many trees as possible, and I note that where removals are proposed, 13 of the total of 19 individual trees are Category C, being of poor quality, and/or limited landscape amenity value. Of the Category A trees shown for removal, one of these is the fine mature Lime T22 which is compromised by its proximity to the Vicarage and its neighbouring tree, the equally fine Plane tree which is shown for retention. The other 2 Category A trees marked for removal (a Beech and another Lime) are also compromised by overcrowding and I accept that there reasons of good arboricultural practice that justify their removal aside from the development proposals. This equally applies to varying degrees to the 3 Category B trees shown for removal.**

However, officers are concerned that whilst a good number of fine quality trees are retained, new build positions are shown to come close to these. Whilst there may well be engineering solutions that can overcome the issue of root zone incursion, what cannot be readily resolved is the issue of heavy shading from retained trees and concerns from residents that will arise from issues to do with the sheer close proximity of these trees. It is anticipated that is inevitable that development of the layout shown in the 6th January letter will lead to **future pressure to fell or heavily reduce these trees to the detriment of their landscape amenity value.** This concern especially applies to plots adjacent and west of the Plane tree T21, and all the plots to the north of the southern boundary trees, many of which are mature Beech and Lime in the churchyard. The plots will be heavily shaded and subject to substantial seasonal leaf fall. Similarly a number of car parking spaces are shown under the crown spread of T21 which will give rise to complaints of falling tree debris and bird

droppings. Overall, officers accept that the trees on this site need a degree of thinning and respacing to allow retained trees to grow on to their best advantage. And also, the removal of a number of these trees will have a limited impact on public amenity. However the permitting of the development as shown in the latest report will lead to strong future pressure for more removals and this is something the Council will have difficulty in resisting because they will have permitted the development that led to the problems arising. Such removals will be erosive of landscape amenity in this sensitive part of the Conservation Area and should be resisted. **The Arboricultural Method Statement appended to the January 6th letter is broadly acceptable, bar the issue described above concerning lightweight structures and natural materials.** This could be clarified by any post consent Condition should that be appropriate.

The agent has reviewed the comments of the officers and respond as follows: • He questions how the development changes to lightweight construction over the RPA's - **in fact the whole development is lightweight timber frame construction.** • He accepts the quantity of tree removals proposed but is concerned by the **potential future 'pressure' from potential residents to cut the remaining trees down. However surely this is something that will completely be in the council's control and anyone buying the properties will be aware to the surrounding trees.** • He questions a couple of tree surgery/ pruning points and we accept his suggestions on these. Officers do not agree in particular with the point regarding future pruning as the Council would be obliged to consider any application for tree works submitted and has a duty to protect the trees, residential amenity and health and safety. Future pressure remains a significant issue and loss of trees also would impact on the character and appearance of the site. As such, based on the information submitted, and indeed the harm to the development of the site in principle, the Council does not support the loss of protected trees on the site.

Please note that the submitted scheme is based on the pre-application advice from the Council's Tree Officer, including his recommendations of opening-up the frontage of the site including the removal of trees. The only Key trees identified to be retained by the tree officer at that time were T21, T19 and either one of T6 or T7. All of which have been incorporated into the design as well as many other existing trees on and surrounding the site.

An Arboricultural Impact Assessment addressing the Tree Officer's other concerns was issued to the council on 12/01/2020 for review. The assessment provides details of Tree Removal and pruning, Tree Protection, Working procedures in Root Protection areas and provisions for tree Planting. It is our suggestion that these measures are secured by conditions if the application is to be approved. In addition to this we suggest it is conditioned that a detailed proposed landscape design of hard and soft landscaping is to be submitted to and agreed with the council prior to works commencing on site. This should include schedules of new tree and shrub planting for approval by the Council's tree officer.

Design Considerations There are a number of concerns regarding the design and layout of the proposed development. The applicant is aware of these but is not proposing any amendments as response. The Council's Principal Design and Conservation Officer has raised a number of flaws and this is particularly importance given the high bar to design (including layout and responsiveness to prevailing character) espoused in the NPPF.

These can be summarised as follows:

- Officers would prefer a layout that includes much more of a street presence. The existing green edge along Darsham Road could be modified to **reveal more of the Vicarage.**

- The scheme should take its place within the village streetscene opposite the village hall and contribute positively by its presence. This could include built form up to and at the front of the site. A narrower mews-like entrance creating a proper village streetscene within the site leading to the vicarage could have been an alternative. Instead, there is a lot of space between and to the side-front of Plots 1- 2 and Plots 3-5 of indeterminate use and usefulness. We do not see how this second comment – requiring more built up form at the front of the site - is compatible with the first – revealing more of the Vicarage!

The welcoming open green space to the front of the site is as a result of the proposed dwellings nearest Darsham Road being set-back from the highway; existing trees to the side of the frontage are retained, and the area between the proposed dwellings and the highway will be landscaped. This means that on first approach the vicarage building is the focal point and the proposed dwellings are not initially visible, but the open landscaping produces a welcoming and subtle hint to what lies beyond.

- The layout has an overly urban character with a kind of rigid geometry that sits ill at ease within the loose informality of the village's character. We consider this approach to be entirely the wrong one. This concern was raised at the preapplication stage. No attempt has been made to draw on the language of rural typologies to master this density of development. Courtyard forms, mews, hierarchies of dwellings, cottage scale, the village green. We are uncertain even how the layout acknowledges the presence of the vicarage other than on the axial entrance route. The dwellings surround the vicarage as it is the social hub and all residents should have a view of it. The layout does not join sufficiently to the vicarage except via parking spaces. The overly urban form of the layout is derived from the density of this development is entirely inappropriate for the site and the centre of the village.

- The preferred location of this street to be rather anti-social, shoved away at the back of the site and forming no real visual connection with the village but only the countryside where it would appear as a very hard urban edge (not at all appropriately). There won't be a "very hard urban edge" – there will be a footpath around the site, and hedgerows

- The form, position and design of the rear terrace are entirely alien to the village character of Westleton. This layout ignores the village in favour of singlemindedly exploiting rural views out of this site regardless of the impact on the rural character of this village at its highly visible edge. The positioning of dwellings here and elsewhere across the site does not bear much relation to the pattern of development adjoining this site or in its surroundings. Please see picture above of the row of terrace houses at the front of the site (Darsham Rd), and below Clematis Close, a development of mainly 2 storey executive homes built on the site of Fisks Nurseries as seen from a gap in the hedge on the public footpath in Wash Lane. This dominates the view. Our site is set further back from Wash Lane than Clematis Close, and our buildings will be bungalows.



The illustrated view from Wash Lane in the DAS shows how the repetitive, uniform effect of this extended terrace has a suburban character, where there is no variation in scale or grouping of forms, that is alien, inappropriate and wholly unwelcome. This proposed countryside edge – outside of the development boundary – is an example of why this layout is unacceptable.

- We do not agree that parking should be facilitated as a design driver of any layout (we agree) otherwise what is so very different to this scheme from any volume housebuilder's estate scale layout? Parking outside your front door? We thought the co-housing concept would offer more that was different to any other development proposal. 1) The proposal is designed to allow residents to live in their homes for as long as possible, hence appropriate for wheelchairs, mobility buggies and live-in carers. A part of this consideration is the access from the dwellings to a car for wheelchair users and disabled residents. Having the potential for a single car to park adjacent/nearby each dwelling is considered for a scheme of this nature (senior cohousing). This is also a requirement of part M4(3) of the building regulations. 2) when we held our Public Consultations on what people actually want, car parking near to their home was a critical factor, even for those who don't drive (so that family and friends, care workers, deliveries etc can park conveniently). Over time we hope to ween residents off their cars by facilitating car shares & a minibus for outings, and use the parking spaces allocated to each individual dwelling for more creative uses eg raised beds, benches etc
- There is nothing in the layout that is unconventional, inspiring or a new way of looking at village housing provision. The co-housing concept has led here to anything but a relatively dense layout. The novelty appears to be more to do with tenure arrangement which may have its own merits. How these arrangements have influenced the design layout is difficult to see, objectively – for example, the entire development is entirely predicated on car use, as would be any other kind of development. The layout also appears to maximise development potential, as would any kind of development. None of it is innovative in the way that the concept for tenure/demographic is presented by the CIC. This is a matter of opinion. The layout is designed to put the Social Hub at its centre to encourage sociability and on-site activities, and has been developed to meet the very specific requirements of the proposed residents. The layout allows residents wheeled access around the site and to their front doors – but the wheels may be mobility scooters, buggies, taxis, ambulances or any other equipment which will enable less mobile people to live independently at home safely and comfortably.

We are of the view that the scheme simply represents over-development in the wrong place with nothing innovative or outstanding in aspect of its layout design.

- The rear street (plots 11-20) ignores the presence of the vicarage and has insufficient relation to it.

We disagree. The vicarage has a prominent position on the site, with the majority of open external spaces located around it to focus resident around the vicarage and promotes social interactions in this area. The rear street, Church View Avenue, is a pedestrian focused 'green' street which flows from and is an extension to the external space around the vicarage

- In terms of parking, perhaps this can be pepper-potted throughout any layout.
- The northern edge is organised on the basis of gardens and buildings backing onto those that exist already and this is a sensible strategy in terms of reflecting built form and context in this part of the site. The western edge is very poorly designed in that it is fully populated edge-to-edge by unrelieved built form.
- Could a connection into the adjoining churchyard would have helped overcome the sense that this development is disconnected from its neighbours. There is a gate through to the churchyard and this will be retained as we are keen to encourage connection to the Church, Village Hall etc
- The volume of this development represents a large number of dwellings in the contrasting style presented here for Westleton. This represents 20 of the 35 new dwellings allocated to Westleton over the emerging Local Plan period.

Whilst it is acknowledged that the individual design of the dwellings is to a high standard, this aspect does not outweigh the other design faults of the scheme we have identified. Please note that the Westleton vernacular is extremely mixed – everything from railway carriages to ultra-modern upside-down rendered properties, and we firmly believe this well designed scheme will contribute to the area in many positive and substantive ways.

Flooding and Drainage The County Council as Local Lead Flood Authority have formally responded advising that insufficient information has been submitted to demonstrate that a suitable drainage strategy on the site can be secured. In the absence of such they have objected as it is not possible to append conditions when drainage suitability is not certain.

Highways Matters No objections have been raised regarding highways matters in terms of the access and parking provision through the site.

Legal Agreement The application has argued the very special circumstances of the proposal, namely for over 65 year olds with local connections to the village. A draft S106 has been shared with officers (and subsequently amended), including CIL officers and the Councils Planning Lead Lawyer. Following review, officers note that the cascade set out does not provide any suitable certainty that this will be achieved and is such that in effect the site is open market dwellings both in the short terms and in perpetuity. The applicant is aware of these concerns but has not submitted any further revisions to deal with such. The application is therefore, without significant revisions and controls open market housing in the countryside contrary to national and local planning policy. We were requested late in the day to draft a s106 and did so; this has been revised once already. It is clear that locals are the preferred target for this scheme, that is why we started this scheme. But if insufficient numbers come forward from this area, we have to have the ability to market the properties wider as we cannot have a partially sold site, economically or socially.

Recommendation - The scheme meets the requirements for developing on an exception site as it delivers specialised housing that we have shown proven need for through our Housing Needs Surveys and Public Consultations. In contrast to the top down, policy driven approach – which omits a **‘specific housing policy addressing the needs of the elderly, despite the dramatic projected increase in the numbers of over 65 year olds living in the region over the plan period’** - we are responding to an identified local need and have formed a Community Interest Company specifically for this purpose. We believe our scheme addresses the needs of our growing elderly population and can promptly deliver 20 of the 35 new dwellings allocated to Westleton during the Plan period. There are planning policies against the scheme and policies for the scheme and we believe the significant benefits to individual residents, the local community and the wider area substantially and clearly outweigh the less than substantial harm potentially caused by the scheme.

Kind regards,

On behalf of Glebe Meadow CIC -

Sarah Quinlan, Dilys Hall, Bob Jackson, Juliet Bulimore

<http://www.glebemeadow.co.uk/>