



Committee Report

Planning Committee North – 14 September 2021

Application no DC/19/1141/OUT

Location

Land To The West Of Copperwheat
Avenue
Reydon
IP18 6YD

Expiry date 24 August 2021

Application type Outline Application

Applicant WM. Denny & Son Limited and Chartwell Industries

Parish Reydon

Proposal Outline Application - Development of up to 220 dwellings with associated open space

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1. Summary

- 1.1 This application seeks outline planning permission for the development of up to 220 dwellings with associated open space. Details of access have been submitted for approval whilst appearance, landscaping, layout and scale are reserved matters for future determination.
- 1.2 East Suffolk Council (Waveney) Local Plan (March 2019) ("The Local Plan") Policy WLP6.1 allocates 9.8 hectares of land west of Copperwheat Avenue, Reydon for the residential development of approximately 220 dwellings. The application site extends farther west to 12 hectares in total but includes the entirety of the allocated land and does not exceed the recommended number of dwellings.
- 1.3 Given the scale of the development proposal and the site area extending beyond the allocation, the application was brought direct to Committee for determination in March 2020, where members resolved to accept the officer recommendation of 'Authority to

Approve', subject to a number of matters including the completion of a S106 Legal Agreement to secure the required planning obligations. The work on that S106 Agreement is now complete, and ready to be sealed and completed by the local planning authority immediately following planning committee and a resolution to approve. However, since the March 2020 planning committee meeting, the Reydon Neighbourhood Plan (RNP) has been formally made following referendum in May 2021. The RNP is now an adopted planning policy document, and that represents a material change in the Development Plan, relevant to the application site, compared to the Development Plan at the time of committee resolution to grant permission (where the RNP was at a relatively early stage of the plan-making process and a material consideration of only limited weight). That requires the application be brought back to Committee for consideration. The National Planning Policy Framework (NPPF) was also updated July 2021, and that represents a notable change to a key material consideration, also.

- 1.4 This report is an updated appraisal of the development proposal, giving full weight to the RNP, alongside The Local Plan, to present an updated recommendation. The proposed development is unchanged from that which was considered and approved by the Planning Committee (North) in March 2020.
- 1.5 As before, the proposed development is supported by officers as a sustainable form of development in accordance with the Development Plan as a whole, along with the recently revised NPPF. Whilst the extended site area beyond the allocated land is, technically, a departure from WLP6.1, it is one that would ultimately facilitate a more integrated and higher quality residential development in terms of, among other things, connectivity with the Public Right of Way network; provision of green infrastructure; provision of sustainable drainage features; and the overall low density of development. The proposal would deliver substantial public benefits that far outweigh any harm arising. The quantum of development, at up to 220 dwellings, accords with the plan-led approach to deliver sustainable housing growth in the Reydon and Southwold area.
- 1.6 Compared to the report and recommendation presented to members in March 2020, there are some notable updates that reflect the ongoing work with the applicant and their agent, in addition to the 'Made' status of the RNP which now forms part of the Development Plan.
- 1.7 The first of those updates is that officers have undertaken a HRA – Stage 2 Appropriate Assessment and consulted Natural England (NE) - NE consider that the proposed development will not have significant adverse impacts on designated habitat sites, and therefore raise no objections to the development proposal. In particular, Natural England agrees that there shall be no adverse impacts on European sites arising from recreational disturbance (and no other sources of impact are considered to apply). Therefore, having carried out an appropriate assessment and received a positive response from NE, officers consider that, pursuant to regulation 63 of the Conservation of Habitats and Species Regulations 2017, planning permission can be granted as there shall be no adverse impacts on the integrity of designated European sites.
- 1.8 A second update is that a full list of planning conditions is now detailed in section ten of this report, and these conditions have been agreed by the applicant. Alongside this, a S106 Legal Agreement has been fully drafted to cover the required planning obligations set out in Section Nine of this report.

- 1.9 The most significant update to the recommendation is in regard to recommended planning condition number 37, covering the principal residence restriction. As those members on Committee in March 2020 will likely recall, and as reflected in the minutes of that meeting (see Appendix 1 of this report), the emerging status of the RNP, at that time, and whether to apply a condition restricting the occupation of the proposed dwellings to only a person's principal residence – i.e., to prevent the dwellings becoming second homes, was a key issue in the Committee debate. At that time, officers were of the view that the RNP was at a relatively early stage in the plan-making process and that, therefore, no such condition should be applied to any permission granted. Members resolved to accept that officer recommendation, granting authority to approve. However, as the RNP was formally made in May 2021 following referendum, the RNP now carries full weight in the decision-taking process. The s.38(6) exercise of the Planning and Compulsory Purchase Act (2004) requires decision-taking to be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan comprises the East Suffolk (Waveney) Local Plan 2019 ("The Local Plan"), and any made Neighbourhood Plans relevant to a development proposal. The application site is wholly within the RNP plan area and thus the RNP, along with the Local Plan, is the starting point for decision-taking. These two Development Plan Documents work together to guide development proposals.
- 1.10 As set out above and in more detail in the planning considerations section of this report, officers have re-appraised the development proposal giving full weight to the RNP policies and have again reached the same conclusion that this proposal would accord with the Development Plan as a whole and that planning permission can be granted. However, a key part of the RNP is Policy 'RNP 4: Principal Residence Requirement' which sets out, among other things, that new open market housing, excluding replacement dwellings, will be supported only where there is a restriction to ensure its occupancy as a Principal Residence. Officers now recommend that the occupancy of the proposed dwellings be restricted by planning condition to prevent them becoming second homes, in accordance with RNP4. The precise wording of that condition is set out in section ten of this report (see condition number 37). The applicant has agreed to accept this condition, should members be minded to grant planning permission. Reydon Parish Council have also been re-consulted on this matter where they reiterate, amongst other things, their expectation of such a condition. Cllr David Beavan, as Ward Member, has responded with formal support for the application now that the principal residence restriction would apply.
- 1.11 Officers are seeking authority to approve the application with conditions, subject to the signing of a Section 106 legal agreement to secure the necessary obligations as recommended in section nine of this report.

2. Site description

- 2.1 Reydon is a village and civil parish one mile northwest of Southwold, approximately two miles east of the A12 road. The village falls wholly within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The majority of built development in the village took place in the 19th and 20th centuries.
- 2.2 The application site is located on the western edge of Reydon, between Keens Lane to the south-west and Copperwheat Avenue to the north east. The site is on the gently sloping

farmland that extends up from the Wang and Blyth Valley to meet the slightly elevated plateau to the west of Reydon. It is a relatively open, arable farmland landscape with a network of large fields that are enclosed by intact hedgerows and hedgerow trees.

- 2.3 The land proposed for development comprises an irregular shaped agricultural field covering some 12 hectares, located adjacent existing residential developments at Copperwheat Avenue and The Crescents. The site is bounded by sports pitches and recreation fields to the north; residential properties to the north-east, east and south; and open countryside to the west. The site is partially enclosed by hedgerows and hedgerow trees.
- 2.4 There are public rights of way (PRoW) along the western and southern boundaries of the site, between the A1095 (Halesworth Road) and the B1126 (Wangford Road) to the west; and between Keens Lane and the B1126 (Wangford Road) to the south.
- 2.5 The B1126 is located approximately 100m east and north-east of the eastern boundary of the site, providing the main route southbound towards Southwold and extending northwards to the A12 at Wangford. Approximately two miles to the north-west of the site, off Copperwheat Avenue, is the B1126/A12 junction which forms a multi-give-way gap arrangement on the dual carriageway A12. This junction effectively forms a main gateway junction for Reydon and Wangford for strategic trips to/from the north.
- 2.6 The site does not include any designated or non-designated built heritage assets. However, the Grade II listed Gorse Lodge Farmhouse lies directly to the west of the site; and the Grade II* listed Church of St Margaret lies to the north of the site, along Wangford Road.

3. Proposal

- 3.1 The application seeks planning permission for the development of up to 220 dwellings with associated open space.
- 3.2 This application is made in outline with some matters reserved. Approval is sought for details of 'Access', whilst 'Appearance', 'Landscaping', 'Layout' and 'Scale' (hereafter referred to as the "Reserved Matters") are not to be determined as part of this application. Should outline planning permission be granted, these matters would be subject of further application(s) for approval of reserved matters before development could proceed.
- 3.3 In terms of access, the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) defines access, as:

"the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network; where "site" means the site or part of the site in respect of which outline planning permission is granted or, as the case may be, in respect of which an application for such a permission has been made".
- 3.4 Thus, this application provides details of access in accordance with the above and is supported by a Transport Statement and Travel Plan that have been reviewed by the County Council Local Highways Authority in their role as statutory consultee.

- 3.5 Whilst this is an outline application with all matters (save for access) reserved for future determination, officers are mindful that the principle of development is largely established through the site allocation policy (WLP6.1). However, as part of the site also falls within the AONB and extends beyond the allocated land area under Policy WLP6.1, officers have worked extensively with the applicant's agent to establish development parameters and principles of design to fix certain aspects to guide any future reserved matters applications, should outline permission be granted, to ensure the acceptability of the scheme. Therefore, three key parameter plans have been submitted for approval:
- Movement and Access Parameter Plan
 - Massing and Scale Parameter Plan
 - Land Use and Green Infrastructure Plan
- 3.6 The Movement and Access Plan presents the primary vehicular and pedestrian access points via Copperwheat Avenue to the north and The Crescents to the east and associated route around the site as a designated parameter framework.
- 3.7 The proposed land use and green infrastructure parameter plan represents those areas of residential development; formal recreation/local equipped play area; drainage infrastructure; and accessible natural green space.
- 3.8 The proposed scale parameter plan fixes scale in different areas of the site in terms of low scale; medium scale; and mixed scale.
- 3.9 The detail of these plans will be assessed in the relevant analysis of this report. In addition to the parameter plans, the updated and revised Design and Access Statement (DAS) reflects the revised layout, parameter plans and integral design guidance.
- 3.10 A key plan submitted for consideration is the Parameter Plan: Movement and Access (Nov 2019). This plan identifies the two primary vehicle and pedestrian access points: one from Copperwheat Avenue in the northeast; and the second from The Crescents, to the east. This plan also demonstrates a new pedestrian access point on the southern boundary of the site, from the public right of way that runs west-to-east between Keens Lane and Wangford Road.
- 3.11 Although not fixed precisely at this stage, the parameter plan also indicates some potential additional pedestrian connections: a second connection on the southern boundary; one on the northern boundary between the site and the existing play area to the north; and three connections with the existing public right of way on the western site edge.
- 3.12 In terms of internal connectivity, final layout is a reserved matter so the precise, detailed internal routes and estate roads cannot be considered at this stage. However, the primary, central vehicular route through the site, connecting the two main points of vehicular access is detailed in the parameter plan and that will form the main spine route that any reserved matters layout has to be organised around.

4. Consultations/comments

Comments/responses received prior to 10 March 2020 Planning Committee (North) meeting (as previously reported to Members)

- 4.1 In response to publication/consultation, 22 letters of objection to the application were received (including from Reydon Action Group for the Environment [RAGE], Southwold and Reydon Society [SRS] and also Ward Member Cllr David Beavan) that raise the following key considerations (inter alia):
- Contrary to policy WLP6.1, the relevant strategic site allocation in the recently adopted Local Plan.
 - It represents a further incursion into open countryside outside the Reydon settlement limits.
 - It represents further damage to the AONB.
 - It ignores the recommendations contained in the Settlement Fringe Landscape Sensitivity Study which was part of the evidence base commissioned by WDC for the new Local Plan.
 - This site is in an area of outstanding natural beauty. This designation should be respected; the land should not be built on but put to good use as farmland.
 - Additional footpaths linking into the existing pathway will give further opportunities for inconsiderate noise and anti-social behaviour that has already occurred in the area.
 - Additional traffic as a result of this proposal will just exacerbate the situation of an inadequate road infrastructure.
 - Proposal represents an overdevelopment in the size of the village.
 - Second access point will increase traffic on The Crescents.
 - Our infrastructure is already at capacity as is our sewerage system which has problems already.
 - Wildlife habitat will be destroyed.
 - The proposal will lead to lots of second homes.
 - To approve the application without a principal residence restriction would undermine the RNP.
 - Second home ownership is unbalancing the community and this scheme should provide houses lived-in by local people to meet the local need.
 - Surface water attenuation area is adjacent existing residential properties.
 - There is not a local need for this amount of housing.
 - The proposal would see the loss of productive agricultural land.
 - Concerned over safety of Keens Lane for pedestrians given increases in traffic and usage of that route.
 - Neighbourhood Plan (NP) Concern about the scale of this development as well as incursion into the AONB.
 - NP consultation identified very strong concern about the impact of the increasing proportion of second homes in Reydon.
 - SRS recommend refusal of this application unless a condition can be set to require that all the market housing on this development should be occupied as principal residences. If this is not possible, the application as it stands should be rejected, or deferred until the NP is adopted.

- SRS object to the application being for a bigger site than that allocated in the Waveney Local Plan (WLP). SRS are concerned that this would provide a lower density of housing and too many executive style homes.
- That said, SRS, along with the PC and NP Steering group, recognise that, as set out in the application, the larger site allows for the kind of landscaping within and in the edge of the site called for in the NP.
- Construction which will have a huge impact on the immediate neighbours, very strict conditions are needed.
- The proposed upgrade of footpath 2 to a bridleway required by SCC may not be deliverable and/or effective.
- The SCC requested conditions refers to the upgrading to a bridleway of Footpath 2 *within the site*; however, the proposed conditions in the Committee Report differ from those requested by SCC.
- The plans show the footpath is outside the application site, and therefore its upgrade cannot be relied upon unless it relates only the central section within the site.
- SCC recommended condition requires bridleway upgrade before occupation of any dwelling; however recommended condition in committee report is prior to occupation of the 101st dwelling.
- Phasing of development will be dependent on market conditions therefore it could be some time before the bridleway upgrade is delivered.
- The Habitats Regulation Assessment undertaken by officers will need to be re-considered.

Additional comments received after March PCN meeting, in response to notification that the application would be returning to PCN in August 2021

4.2 Ward Member, Cllr David Beavan, provided further formal comments (received 26 July 2021):

“Please add my formal support to this submission. The housing crisis locally is deepening as AirBNB becomes an attractive alternative to private rentals.

We are being stopped by housing from building more affordable homes for local people to rent because of this impending development which is expected to supply the need. I sincerely hope that the homes will be affordable, unlike the current offering at the old hospital site of a shared ownership house at £125k down payment and rental and charges of £900 a month. Our AONB should be used for housing that is needed not second and holiday homes which are destroying our community.”

Consultees

Consultee comments received since 10 March 2020 Planning Committee (North) meeting

Consultee	Date consulted	Date reply received
Reydon Parish Council		22 July 2021
<p>“SUBMISSION FROM REYDON PARISH COUNCIL TO ESC NORTH AREA PLANNING COMMITTEE: DC/19/1141/OUT – Land West of Copperwheat Avenue, Reydon ES/0328 AUGUST 2021</p> <p>1. REYDON NEIGHBOURHOOD PLAN HOUSING POLICIES RNP1 and RNP4</p> <ul style="list-style-type: none">• <i>The Parish Council (PC) expects the Principal Residence policy (RNP4) from our “made” Neighbourhood Plan (NP) to be applied to this application if it is approved.</i>• <i>All the evidence presented to the PC, including the survey responses for the NP, show great concern among the community about the scale of this development. As a PC, however, we have accepted that more housing is needed both locally and, generally, in the district and that Reydon should take its share</i>• <i>However, we are concerned that this housing should meet our local needs – hence the Principal Residence requirement policy in our NP. This reflects a rise in second homes in Reydon to 25-30% (up from 7% in 2002) which is distorting the local housing market and pricing local people out of the market. This will be a continued pressure as the proportion of second homes in Southwold has now reached 60%.</i>• <i>Alongside this, policy RNP1 (Tenure Mix of Affordable Housing) must also be applied. This policy restricts new affordable housing to Affordable Rented and Shared Ownership housing. Both these categories of tenure are protected by the parish status as a Designated Protected Area which means that these forms of affordable housing will remain as such into the future and thus continue to be available to local people in housing need.</i>• <i>Policies RNP1 and RNP4 are key policies in our Neighbourhood Plan aimed at ensuring housing is available for local people and to maintain a sustainable community of mainly permanent residents.</i> <p>OTHER RELEVANT POLICIES FROM REYDON NEIGHBOURHOOD PLAN</p> <ul style="list-style-type: none">• <i>More broadly, our NP seeks to ensure Safe Access to and from new developments, Safe Walking and Cycling routes, improved Footpath Access to the countryside and Southwold and sets out key Design Principles. (Policies RNP6, RNP8, RNP9, RNP10).</i>• <i>The plans submitted with this application include significant detail which, by and large, complies with these policies and these are to be commended. We ask, therefore, that, if this application is approved, conditions are set to ensure these policies are applied fully.”</i>		

Consultee	Date consulted	Date reply received
Natural England		20 April 2020
<p>Summary of comments: NO OBJECTION Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection. Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.</p> <p>European sites –</p> <ul style="list-style-type: none"> - Benacre to Easton Bavents Special Protection Area (SPA) - Benacre to Easton Bavents Lagoons Special Area of Conservation (SAC) - Minsmere – Walberswick Ramsar Site - Minsmere – Walberswick SPA - Minsmere to Walberswick Heaths and Marshes SAC <p>Natural England agrees with the conclusion of the appropriate assessment record that this proposal is not likely to result in an adverse effect on any international site from recreational disturbance effects.</p> <p>Site of Special Scientific Interest (SSSI)</p> <ul style="list-style-type: none"> - Minsmere-Walberswick Heaths and Marshes SSSI - Pakefield to Easton Bavents SSSI <p>Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.</p>		

Consultee comments received prior to 10 March 2020 Planning Committee (North) meeting

Consultee	Date consulted	Date reply received
Reydon Parish Council	4 April 2019	2 May 2019
<p><i>“Reydon Parish Council has carefully considered the Application for Outline Planning Permission for 220 houses on the land west of Copperwheat Avenue and wishes the following issues to be taken into account in any discussions with the applicant and in conditions to be imposed as part of any permission that the Council sees fit to grant.</i></p> <p><i>1. We recognise that the proposal is consistent with the newly adopted Local Plan for Waveney. Nonetheless, we must also reiterate the widespread concern of our residents that this development is too big, especially given the fact that it will require a major loss of AONB land. It certainly represents a major expansion of our village (double the growth seen in the last ten years) and as a Parish Council we see this as at the absolute limit of what can be accepted and sustained by our community. Underpinning this view is a concern about employment for the new residents. Some people may move here as they already work in Southwold or Reydon (but many of these will find the market housing out of reach, given the modest income from most local employment). However, most of the new residents will work elsewhere and will be forced to commute by car given the</i></p>		

limited public transport options (see points 4,5 and 6 below).

2. That said, we welcome both the low density of this development and the real care that has been given to integrating the development into the countryside, using a range of local and Suffolk vernacular materials and design features, such as the weatherboarded housing closest to the countryside and the large landscaped areas around and within the development. These measures are consistent with the aims and policies in our emerging Neighbourhood Plan which we hope will be able to influence the detailed proposals which will be presented when a full application is submitted.

3. The application, very fairly, documents the considerable range of concerns raised by residents in the community consultation. However, these have only been responded to in some areas. As stated above, many residents remain highly concerned about the size of this development and, whilst we recognise that the new Local Plan has determined this issue, it is extremely important to our residents that their other concerns are addressed as fully as possible. We ask that Planning Officers review these concerns and work with the applicant to address them as appropriate.

4. A major issue, highlighted in the consultation, that needs to be explored further is the traffic impact. Residents are concerned about this, especially access to and from Wangford Road. However, apart from traffic calming within the proposed development and improvements to the A12 junction at Wangford, there is nothing in the proposals to address these concerns. In addition to the proposed pedestrian crossing by Jermyns Rd, we believe traffic calming measures are needed at the access points, possibly in the form of mini roundabouts.

5. We applaud the stated aims of plans for walking and cycling access to the development and the promotion of these modes of travel to reduce car use. However, the measures to achieve this are largely within the site but they will only work if measures around the village extend these into really useable and attractive routes. There is talk of a cycle route along the Wangford Road, for example, but this does not exist and it is unclear what or how this is proposed (if, indeed it is). If such a cycle route is feasible, it should be a condition of the outline approval and, depending on how it is achieved, could also help with the need for traffic calming measures (point 4).

6. In terms of access to the development, the application also refers to the bus services which pass along the Wangford Road. Recent experience with considerable reductions in the service linking Reydon with the rail service at Halesworth confirms that all our local bus services are at risk and may change or cease abruptly. This reinforces the need to make walking and cycling genuinely safe and easy options for local travel (around the village and to Southwold) and to ensure car traffic is well managed, with safe access to and from the development and speed reduction measures along the Wangford Road.

7. The housing mix is improved from the pre-application proposals and this is a welcome response to what was said by residents, particularly the addition of bungalows. However, there remain a significant number of four bedroom, mainly market, houses. These are likely to be out of the price range of those living or working locally and do not reflect the need identified in our emerging Neighbourhood Plan for a predominance of smaller 2-3 bedroom dwellings.

8. We welcome the extensive proposals for landscaping and provision of open spaces and trees and hedgerows within and around the development. In order to ensure that the screening edges of the proposal are effective at the start of occupation, we believe that the edge planting should be carried out prior to the beginning of construction and that this should be a condition of approval. In

relation to play spaces, we agree that two should be provided. However, the one to the north of the development is very close to the existing play area off Barn Close. We believe it would be better to extend this into the development and refurbish it rather than create a second separate play area.

We ask that these considerations are taken into account and reflected in the conditions of approval of this application.

Consultee	Date consulted	Date reply received
Reydon Parish Council	12 December 2019	No response
Summary of comments: See response dated 02 May 2019.		

Consultee	Date consulted	Date reply received
Reydon Parish Council	12 December 2019	21 February 2020
<p>Summary of comments:</p> <p><i>DC/19/1141/OUT - 220 homes on land west of Copperwheat Avenue.</i></p> <p><i>Reydon PC would like this application to be determined by the Planning Committee and not by delegated powers as they are very concerned that these new dwellings should only be sold as principal residences, the number of second homes has grown dramatically recently and is already threatening the viability of the community.</i></p> <p><i>There is also inadequate provision in the plans for walkers and cyclists.</i></p> <p><i>Reydon's Neighbourhood Plan, which has reached Regulation 16 stage, includes Policy RNP - Principle residence requirement and Policy RNP 9 asks that all developments should include provision for safe walking and cycling which contribute to improved access to key areas in the village.</i></p> <p><i>Cllr O'Hear would like to attend the Planning Committee meeting to speak on RPC's behalf and, if possible, meet with the case officer ahead of the Planning Committee meeting in March to discuss these issues.</i></p>		

Consultee	Date consulted	Date reply received
Reydon Parish Council		09 March 2020
<p>Summary of comments:</p> <ul style="list-style-type: none"> <i>The Parish Council (PC) supports the case for applying the Principal Residence policy from our emerging Neighbourhood Plan (NP) which we do not consider is at an early stage as Reg 16 is the last stage before the Examination and Referendum.</i> 		

- *All the evidence presented to the PC, including the survey responses for the NP, show great concern among the community about the scale of this development. As a PC, however, we have accepted that more housing is needed both locally and, generally, in the district and that Reydon should take its share.*
- *However, we are concerned that this housing should meet our local needs – hence the Principal Residence requirement policy in our draft NP. This reflects a rise in second homes in Reydon to 25-30% (up from 7% in 2002) which is distorting the local housing market and pricing local people out of the market. This will be a continued pressure as the proportion of second homes in Southwold has now reached 60%.*
- *We therefore urge the Committee to apply the draft NP policy on Principal Residence Requirement as a condition of this application. (attached below). Without this condition, as many as 40 of the market houses will become second homes and more over time. These houses will not contribute to the Local Plan's targets which are aimed at meeting the assessed housing needs of our resident population. This undermines the case for building in the AONB which is based on the assessed local need for housing.*
- *Alternatively, it could delay its decision until the outcome of the Examination of the NP. This would be a similar approach to that taken by the County Council in considering a planning application for a gravel pit in Reydon which has been deferred until the Mineral Local Plan is adopted.*
- *The NP also seeks to limit the forms of tenure of affordable housing to that of affordable rent and shared ownership only to ensure that the affordable housing can be retained in the long term. The affordable housing condition in this application is in line with current policy so that 25% will be shared equity. We believe it is possible to ensure that such housing remains available as shared equity in the long term by a planning condition and/or a covenant. We ask the Committee to place such a condition on the shared equity housing.*
- *More broadly, our draft NP seeks to ensure safe access to and from new developments, improved provision for walking and cycling to the countryside and to key locations in the village and in Southwold, good landscaping within developments and a sympathetic interface with the countryside. Absolutely essentially, we need adequate sewerage provision given current problems in areas of Reydon close to this major development site.*
- *As part of the sewerage provision, Anglia Water have proposed an attenuation tank under the nearby Jubilee Green in order to make the flow into the current system manageable. This system is already under strain and regularly backs up and sometimes floods. We are concerned that attenuation may not be an adequate solution. In addition, we do not believe that Jubilee Green, which has just been developed in a way that meets local need, should be disrupted. We, therefore ask the Committee to require that all the necessary additional sewerage infrastructure is provided within the development site and that the developer is required to contribute to improvements to the existing infrastructure adjacent to the site.*
- *All the other elements of infrastructure requirements and design principles in our draft NP have been addressed by the work of the Planning Officers in the Parameter plans etc.*
- *Therefore, if the Committee is minded to approve this application, we ask the Committee to satisfy itself that the conditions ensure that the subsequent application for Full Planning Permission (ie to deal with reserved matters) is required to comply in full to the spirit and detail of these plans.*
- *We ask you to set maximum possible requirements for these aspects of the scheme and also to require adequate funding (CIL and/or S106 or equivalent) for safe access, traffic*

calming, walking and cycling improvements from the site to key places etc.

- Finally, we also ask that you ensure the edge landscaping is undertaken in full at or prior the commencement of work so that it has time to establish before building is complete and that the construction plans mitigate the serious effects that will be felt by those living on the access roads in particular.

Draft Reydon Neighbourhood Plan (Reg 16 stage) Policy RNP 4: Principal Residence Requirement:

Due to the impact on the local housing market of the continued uncontrolled growth of dwellings used for holiday accommodation (as second or holiday homes) new open market housing, excluding replacement dwellings, will be supported only where there is a restriction to ensure its occupancy as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.

Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. The condition on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when East Suffolk Council requests this information.

Proof of Principal residence is via verifiable evidence which could include, for example (but not limited to), residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).

Reydon Parish Council asks the ESC Planning Committee to apply the bold section of the draft NP Policy to the market housing in the development proposed for the land west of Copperwheat Avenue.

Consultee	Date consulted	Date reply received
Suffolk County - Highways Department	4 April 2019	15 April 2019
Summary of comments: Holding objection for further information.		

Consultee	Date consulted	Date reply received
Suffolk County Archaeological Unit	4 April 2019	12 April 2019
Summary of comments: Holding objection; Geophysical survey of site required to inform response.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	4 April 2019	17 April 2019
Summary of comments: Holding objection for further information.		

Consultee	Date consulted	Date reply received
Suffolk County - Rights Of Way	4 April 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Suffolk County - Minerals And Waste	4 April 2019	23 April 2019
Summary of comments: No objections; condition recommended.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	4 April 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Natural England	4 April 2019	30 July 2019
Summary of comments: Undertake an HRA - Stage 2: Appropriate Assessment and re-consult Natural England on package of mitigation including Suffolk RAMS contribution.		

Consultee	Date consulted	Date reply received
Suffolk County - Highways Department	12 December 2019	23 December 2019
Summary of comments: No objections; recommended conditions to follow. <u>Revised comments received 24 February 2020 in respect of public rights of way matters:</u>		

“Further to my response dated 24/01/2020, the following amendments to the Public Rights of Way (PROW) element of the response are required:

The previous SCC PROW comments/ S106 requirements (shown overleaf for reference) should be replaced by the following recommended conditions:

Condition: No part of the development shall be commenced until details of improvements (including widening of the useable width and surfacing) to Footpath 2 within the site have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety prior to occupation.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of sustainable travel and recreational benefit.

Condition: No dwelling shall be occupied until Footpath 2 within the site has been converted to a public bridleway.

Reason: To ensure that the necessary legal requirements to enable sustainable travel are made available for use at an appropriate time in the interests of sustainable travel and recreational benefit.

A extract of a plan showing Footpath 2 is shown overleaf (ref: E-445/002/0 on plan).”

Consultee	Date consulted	Date reply received
Suffolk County Archaeological Unit	12 December 2019	12 December 2019
Summary of comments: No objections; conditions recommended.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	12 December 2019	23 December 2019
Summary of comments: Recommend approval.		

Consultee	Date consulted	Date reply received
Suffolk County - Rights Of Way	12 December 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Suffolk County - Minerals And Waste	12 December 2019	No response
Summary of comments: See comments dated 23 April 2019.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	12 December 2019	No response

Summary of comments:
No comments received.

Consultee	Date consulted	Date reply received
Natural England	12 December 2019	No response

Summary of comments:
See final comments dated 20 April 2020.

Consultee	Date consulted	Date reply received
Historic England	12 December 2019	16 December 2019

Summary of comments:
No comments to make on the application.

Consultee	Date consulted	Date reply received
Suffolk County Archaeological Unit	13 September 2019	13 September 2019

Summary of comments:
No objections, conditions recommended.

Consultee	Date consulted	Date reply received
Suffolk Coasts and Heaths Project	4 April 2019	12 April 2019

Summary of comments:
No comments beyond those made as part of the Local Plan examination process.

Consultee	Date consulted	Date reply received
Mr Nick Newton	4 April 2019	2 January 2020
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Design And Conservation (Internal)	4 April 2019	14 January 2020
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
WDC Environmental Health - Contaminated Land	4 April 2019	16 April 2019
Summary of comments: No objections; conditions recommended.		

Consultee	Date consulted	Date reply received
Planning Policy (Internal)	4 April 2019	3 May 2019
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
WDC - Drainage And Coast Protection	4 April 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Waveney Norse - Property And Facilities	4 April 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Police - Alan Keely Crime Reduction Beccles Police Station	4 April 2019	9 April 2019
Summary of comments: No objections. Development seems to include a lot of good measures. Further advice given for detailed design.		

Consultee	Date consulted	Date reply received
Suffolk County Council Section 106 Officer	4 April 2019	23 April 2019
Summary of comments: No objections; conditions, obligations and CIL contributions advice given.		

Consultee	Date consulted	Date reply received
Disability Forum	4 April 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	4 April 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
WDC - Housing	4 April 2019	20 May 2019
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Suffolk Fire And Rescue Service	9 April 2019	9 April 2019
Summary of comments: No objections; advice given.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology (Internal)	13 May 2019	5 June 2019
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Suffolk Coasts And Heaths Project	12 December 2019	No response
Summary of comments: See comments dated 28 August 2019.		

Consultee	Date consulted	Date reply received
Landscape Team (Internal)	12 December 2019	No response
Summary of comments: Internal response, see report.		

Consultee	Date consulted	Date reply received
Design And Conservation (Internal)	12 December 2019	No response
Summary of comments: Internal response, see report.		

Consultee	Date consulted	Date reply received
Environmental Protection (Internal)	12 December 2019	17 December 2019
Summary of comments: Refer to previous comments.		

Consultee	Date consulted	Date reply received
Planning Policy (Internal)	12 December 2019	No response
Summary of comments: Internal response, see report.		

Consultee	Date consulted	Date reply received
WDC - Drainage And Coast Protection	12 December 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Waveney Norse - Property And Facilities	12 December 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Police - Alan Keely Crime Reduction Beccles Police Station	12 December 2019	No response
Summary of comments: See response dated 09 April 2019.		

Consultee	Date consulted	Date reply received
Suffolk County Council Section 106 Officer	12 December 2019	16 December 2019
Summary of comments: No objections; conditions, obligations and CIL contributions advice given.		

Consultee	Date consulted	Date reply received
Disability Forum	12 December 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	12 December 2019	No response
Summary of comments: No comments received.		

Consultee	Date consulted	Date reply received
Housing Development Team (Internal)	12 December 2019	No response
Summary of comments: Internal response, see report.		

Consultee	Date consulted	Date reply received
Suffolk Fire And Rescue Service	12 December 2019	No response
Summary of comments: See response dated 09 April 2019.		

Consultee	Date consulted	Date reply received
Southwold And Reydon Society	12 December 2019	No response
Summary of comments: See comments received 28.10.2019.		

Consultee	Date consulted	Date reply received
Southwold And Reydon Society	28 October 2019	28 October 2019
Summary of comments: Object to the application, primarily due to site area going beyond allocation policy WLP6.1. See full response on public access page.		

5. Publicity

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

Category	Published	Expiry	Publication
Major Application	12 April 2019	8 May 2019	Beccles and Bungay Journal
Category	Published	Expiry	Publication
Public Right of Way Affected	12 April 2019	8 May 2019	Lowestoft Journal

Site notices

General Site Notice

Reason for site notice: Major Application; Contrary to Development Plan; Affects Setting of Listed Building; In the Vicinity of Public Right of Way
Date posted: 18 April 2019
Expiry date: 14 May 2019

6. Planning policy

National Planning Policy Framework 2021 (NPPF)

National Design Guide (2019)

National Model Design Code (2021)

Building for a Healthy Life (BHL)

East Suffolk Council Historic Environment Supplementary Planning Document

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)

WLP1.3 - Infrastructure (East Suffolk Council - Waveney Local Plan, Adopted March 2019)

WLP6.1 - Land West of Copperwheat Avenue, Reydon (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)

WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion (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)

RNP1: Tenure Mix of Affordable Housing (Reydon Neighbourhood Plan, 'Made' May 2021)

RNP4: Principal Residence Requirement (Reydon Neighbourhood Plan, 'Made' May 2021)

RNP5: Maintaining Protection of the Countryside round the Village (Reydon Neighbourhood Plan, 'Made' May 2021)

RNP6: Improving Public Rights of Way and access to the Countryside from new Developments (Reydon Neighbourhood Plan, 'Made' May 2021)

RNP8: Safe Access To and From New Developments (Reydon Neighbourhood Plan, 'Made' May 2021)

RNP9: Safe Walking and Cycling Routes (Reydon Neighbourhood Plan, 'Made' May 2021)

RNP10: Reydon Neighbourhood Design Principles (Reydon Neighbourhood Plan, 'Made' May 2021)

7. Planning considerations

Planning Policy Background

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 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. The relevant planning policies are set out in section six of this report.
- 7.2 The Development Plan comprises the East Suffolk (Waveney) Local Plan 2019 ("The Local Plan"), and the Reydon Neighbourhood Plan (RNP) which was made in May 2021 following referendum. When this application was previously considered by the Planning Committee

(North) in March 2020, the RNP was in draft and at a relatively early stage in the plan-making process. Thus, the 'made' status of the RNP is an important change in the Development Plan since that previous Committee meeting, and the relevant policies of the RNP must now be given full weight along with the relevant policies of The Local Plan.

Principle of Development

- 7.3 The Local Plan was adopted in March 2019 and sets the Council's development vision for the period up to 2036. The spatial strategy (policies WLP1.1 and WLP1.2) identifies the amount of growth to be delivered over the plan period and where that growth should be. New housing, in particular, should be delivered in sustainable locations. As part of that spatial strategy, the Southwold and Reydon area is expected to deliver approximately 4% of housing growth in the Waveney Local Plan area. The main policy to deliver that housing growth is WLP6.1 (Land West of Copperwheat Avenue, Reydon) which allocates 9.8 hectares of land for a residential development of approximately 220 dwellings.
- 7.4 The application site includes the 9.8 hectares of allocated land under policy WLP6.1; thus, the principle of residential development on that allocated land is set by the adopted Local Plan which has been through the scrutiny of examination and found to be sound. Of note is that the proposed application site extends to some 12 hectares, going beyond the allocated area by some 2.2 hectares - to include the strip of land running between the allocated land in the east and the existing field boundary and public right of way (PRoW) to the west. The inclusion of that additional land beyond the allocation means that, technically, the proposal is not strictly in accordance with the Local Plan spatial strategy and policy WLP6.1.
- 7.5 The first point to make is that the proposed quantum of development accords with the policy WLP6.1 objective to deliver a residential development of approximately 220 dwellings. In that sense, the departure from the policy is in terms of the site area, rather than the quantum of development. A criterion of WLP6.1 is also to achieve a lower density of development (approximately 25 dwellings per hectare) which would be more achievable on the proposed, larger application site when compared to the allocated land.
- 7.6 In terms of the acceptability of developing land farther west than the allocated land, that largely comes down to detailed assessment of a number of factors to be addressed within this report. However, the starting point is that officers consider the proposal, in principle, meets the broader objectives of the Local Plan spatial strategy and policy WLP6.1 to deliver a residential development of approximately 220 dwellings in Reydon, on land west of Copperwheat Avenue. It is acknowledged though that the 12 hectare site area goes beyond the 9.8 hectares of allocated land and that represents a policy conflict that will need to be considered carefully by the decision-taker although as explained in this report officer's view remains that this does not affect the overall recommendation that planning permission should be granted.

Highways Safety and Sustainable Transport

- 7.7 Policy WLP8.21 promotes sustainable transport, which also includes development that is safe in highways terms. The NPPF sets out (inter alia) that:

Paragraph 110 - *“it should be ensured that... (b) safe and suitable access to the site can be achieved for all users”*; and

Paragraph 111 - *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

7.8 Policy RNP 8 (Safe Access To and From New Developments) sets out that:

“New developments should demonstrate the way in which they can safely be accommodated within the capacity of the local highways network. Where necessary, new developments should incorporate more than one point of access. Developments that would cause an unacceptable impact on the capacity or safety of the local highway network will not be supported.”

7.9 Policy RNP 9 (Safe Walking and Cycling Routes) sets out that:

“Where practicable, all developments, other than householder proposals, should include provision for safe cycling and walking routes on site and to and from the development (including pedestrian crossings of main roads where appropriate), and contribute to improved walking and cycling access to key places in the village (such as Reydon Primary School, the Sole Bay Health Centre, village shops), to the countryside and to the facilities and shops in Southwold.”

7.10 Site Allocation policy WLP6.1 provides site specific criteria in relation to transport and highways matters:

- “A Transport Assessment and Travel Plan should be submitted with any planning application.
- Development will include improvements to The Crescents as well as a pedestrian crossing of Wangford Road to be defined through a Transport Assessment.”

7.11 A Transport Assessment and Travel Plan (both revised during the course of the application) have been submitted and reviewed by the County Council Highways Authority (SCC Highways) in their role as a statutory consultee. SCC Highways are satisfied with the proposals and recommend any planning permission granted is subject to their suggested conditions and obligations.

7.12 The proposal incorporates two points of vehicular access: an extension of Copperwheat Avenue southwards into the area proposed for residential development; and on the eastern boundary, an access from The Crescents. These two vehicular accesses would include footway provision for pedestrian access to-and-from the site, connecting with existing footways. As part of the footway works, improved pram crossings would be undertaken on the junction bellmouth at Farmland Close (off Copperwheat Avenue); and also, on both sides of The Crescents.

7.13 The proposals as originally submitted indicated that the access from Copperwheat Avenue would be the primary access (serving approximately 2/3rds of the development) whilst the access from The Crescents would be a secondary access for the remaining 1/3rd. This traffic distribution would have been difficult to control at outline stage but, in any event, the result

of that indicative proposal was to, in effect, sever the southern third of the site from the northern two-thirds. Officers considered this poor design that would prevent an integrated and cohesive site layout. The updated parameter plan (movement and access) establishes a primary vehicle route through the site connecting the two access points which will allow for a more equally distributed pattern flow between the two access points. The Highways Authority are satisfied with this approach and officers consider that the result is a better distribution of traffic, and it will lead to a more integrated layout. By implementing two access points the issue of emergency access is also resolved ensuring there should always be a point of access to the site available.

- 7.14 In addition to points of vehicular and pedestrian access to the site, the proposal also includes details of a new pedestrian crossing on Wangford Road immediately to the north of the Jermyns Road/Wangford Road junction which will form the main route to/from the primary school and the site. This would be in the form of a zebra crossing. New road markings (denoting 'SLOW') would be undertaken on the highway to the south side of the zebra crossing and farther north on Wangford Road. Footway widening (to 1.8m) is also proposed between The Crescents and Jermyns Road, on the west side of Wangford Road.
- 7.15 A system of shuttle working is also proposed on the local section of Wangford Road to attenuate traffic speeds. This is a system that restricts the movement of the traffic to alternate one-way operation along the road in order to reduce traffic speeds.
- 7.16 The off-site highway works proposed would need to be secured by planning condition and the applicant entering into a Section 278 agreement with the Highways Authority to undertake the works.
- 7.17 The Transport Statement also assesses the potential trip demands arising from the proposed development and, on account of its proximity to the site, also assesses the likely operational performance of the B1126 Wangford Road/A1095 Halesworth Road junction against existing 2018 background traffic flows. Additionally, the potential traffic impact of the proposals on the B1126/A12 junction is also considered.
- 7.18 In terms of impact on the wider highway network, the Transport Statement concludes (paragraph 5.16):

“The PICADY traffic modelling undertaken herein demonstrates the B1126 Wangford Road/A1095 Halesworth Road junction and B1126/A12 crossroads will provide ample capacity, and even under full development loadings at future year assessment 2023 no arm of each junction is shown to be operating above 50% of theoretical capacity. The additional levels of demand arising from the proposed scheme show that the free-flow of traffic at these junctions will not be significantly compromised. While it is noted that there may be alternative methods for the distribution of development-generated traffic onto the network, in reality traffic capacity is not a significant issue in this case.”

- 7.19 Officers are satisfied that the local highway network is capable of absorbing the traffic generation from this proposal. At the points where Copperwheat Avenue and The Crescents feed onto Wangford Road, the visibility in both directions is acceptable and suitable to serve the increased traffic flows arising from the development proposal.

- 7.20 Whilst the detailed assessment of the traffic generation indicates the highway network can accommodate the proposed development, it would still generate a significant number of additional vehicle movements in the area. There are identified accident cluster sites to the north and south of the site. The A12/B1126 Wangford junction is among the most significant junction cluster sites in the county with 10 recorded injury accidents in the last 5 years. Furthermore, development traffic heading south would use the A1095 and its junction with the A12. In the last 5 years there have been 5 recorded injury accidents at the A12/A1095 junction and 15 recorded injury accidents on the A1095 (which would be considered a linear cluster site). Subsequently, in order to make the development acceptable, a Section 106 financial contribution is required to help mitigate the impact of the development on the above cluster sites. A contribution of £250 per dwelling (£55,000) is required by the Highway Authority to contribute towards Road Safety Engineering schemes at the above locations. The applicant has agreed to this financial contribution to mitigate impacts arising directly from the development.
- 7.21 In addition to the main points of vehicle and pedestrian access detailed in full and described above, the site offers the opportunity to provide multiple points of pedestrian connectivity with the existing public right of way network.
- 7.22 PRow number 1 (E-445/001/0) runs north-south along the western edge of the site. PRow number 2 (E-445/002/0) runs west-east along the southern edge of the site, and within the site for a considerable stretch. The Movement and Access parameter plan indicates the potential for four points of pedestrian access to these PRow's. The precise location of those pedestrian access points and the manner in which they will be designed and integrated into the layout would need to be secured by planning condition and through the submission of reserved matters applications. However, the potential for the site to provide those pedestrian connections is an important part of the masterplan principles for the site and creating an integrated layout that promotes walking and cycling.
- 7.23 Part of the initial recommendation made by the County Council Highways Authority and Rights of Way Team was planning obligations to secure a developer contribution to fund upgrade works to PRow No.1 on the western boundary to make this route a bridleway that would provide a legal cycle route for residents to access the church to the north, and Halesworth Road to the south. Officers accepted that recommendation, but the County Council advised, prior to the January committee meeting, that the upgrades to the PRow would not actually be deliverable due to (previously unknown) issues around third party land ownership; the legal width of the PRow adjacent Laurel Farm; and the need for an access creation agreement to enable upgrades to the southern extent of the PRow (Keens Lane).
- 7.24 Since those revised comments were received, officers have liaised with the County Council in order to understand the revised position in terms of public rights of way matters. The agreed position, reflected in the County Council Highways Authority comments (received 24 February 2020), is that any improvement and upgrades should focus on PRow number 2, to the south. This PRow runs partly through the southern part of the application site, and then the stretch between the site and Wangford Road to the east/northeast is also in the applicant's ownership. Therefore, the majority of Footpath 2 is in the applicant's control, save for a small stretch to the west where it connects to Keens Lane. The legal width of this PRow is more than sufficient to allow for extensive widening and surface upgrades to make this route suitable for future adoption as a bridleway and therefore for use as a cycle route.

As existing, this route is heavily overgrown and narrow, limiting two-way pedestrian traffic along it. This is an important route enabling access to Wangford Road and the local services nearby in the village centre; therefore, officers consider that upgrades to this route are desirable and will improve the connectivity of the site. In doing so a loop would also be created where pedestrians and cyclists can easily connect from Kingfisher Crescent to Wangford and back again.

- 7.25 Whilst upgrades to PRow number 1 on the west would also be of benefit, following further consultation with the County Council, officers are of the view that such works are not deliverable. However, the proposal will still provide for multiple pedestrian connections to that western PRow which will enable excellent connectivity with the existing right of way network. This would accord with the objectives of Policy RNP 6 (Improving Public Rights of Way and access to the Countryside from new Developments), which requires that new developments should protect and, where appropriate, enhance the Public Rights of Way network through the provision of new connections to the Public Rights of Way network, new or extended routes, or other improvements. RNP6 also requires that new or extended routes should be planned to avoid disturbance to protected habitats.
- 7.26 Based on the revised County Council position, and for the reasons set out above, officers recommend planning conditions be applied to any permission in order to secure upgrades to the PRow number 2.
- 7.27 To the northeast corner of the site, there is potential for a new pedestrian connection from the development into the existing play area at Barn Close. This would need to be secured and delivered through condition and reserved matters applications as a further means of integrating the development into the existing built context.

Reydon benefits from a number of services and facilities that are proximate to the application site with approximate travel distances from Copperwheat Avenue presented in the list below:

- Bus Stop (approx. 130m to the North)
- Day Nursery (approx. 400m to the South East)
- Primary School (approx. 400m to the South East)
- Reydon Pharmacy (approx. 500m to the South)
- Recreation Ground (approx. 550m to the East)
- Reydon Village Store (approx. 600m to the East)
- Village Hall (approx. 0.7 miles to the South East)
- Londis (approx. 0.8 miles to the South East)

- 7.28 Local services, facilities and public transport options are within readily achievable walking and cycling distance of the site. The towns of Southwold and Lowestoft are accessible from the site via public transport.
- 7.29 The nearest bus stop to the site is located on Wangford Road, some 30m from Copperwheat Avenue. From there Southwold Town Council Southwold Shuttle service provide a service between Southwold – Reydon - Southwold for journeys hourly with two time changes throughout the day. The approximate journey time from the site to Southwold, Kings Head via bus is 15 minutes.

- 7.30 The nearest major bus stop to the site is located on Green Lane approximately 200m north from Copperwheat Avenue. From there Border Bus service 146 provides a service between Southwold – Pakefield – Beccles – Norwich hourly, with an increased service at every half hour between 09:05 and 11:35.
- 7.31 The existing road network and points of site access are not compatible with facilitating bus access directly into the application site. Therefore, the approach with this proposal is to promote use of these two existing bus stops. Part of that strategy is improvements to the footway through to Wangford Road by the junction with Jermyns Road, as set out earlier in this section. However, a second part of the strategy is to secure a developer contribution to fund improvements to these two bus stops. The applicant has agreed to this which will need to be secured by S106 agreement.
- 7.32 The application also includes a Travel Plan that has two key objectives:
- Positively and effectively encourage the use of more sustainable and healthy travel modes such as walking, cycling and public transport by future residents of the scheme;
 - Minimise the use of travel modes that have the highest environmental and traffic impact, such as single-occupancy trips by fossil-fuel motor vehicles, especially where other alternatives are available.
- 7.33 The Travel Plan includes a number of measures to promote sustainable modes of transport and, to ensure that those measures are implemented, an index linked Travel Plan Contribution, payable to Suffolk County Council, needs to be secured through a Section 106 Agreement. This will ensure the Travel plan is implemented in accordance with the Suffolk County Council Travel Plan Guidance closer to the time the site will be occupied.

Conclusions on Highways Matters and Sustainable Transport

- 7.34 The application site is well-related to the existing settlement and the facilities therein that are accessible by walking and cycling. The proposal includes a number of off-site highway works, and improvement to the southern PRoW that will not only offset the impacts of the development, but also deliver improvements that will benefit both existing and new residents. The proposed site will integrate well into the existing footway and PRoW network, and the travel plan measures to be implemented will promote sustainable modes of transport.
- 7.35 The means of vehicle and pedestrian access to-and-from the site, detailed in this application, are acceptable to officers and the County Highways Authority. Officers therefore consider that the development proposal meets the sustainable transport objectives of the NPPF; Local Plan policies WLP6.1 and WLP8.21; and RNP policies RNP6, RNP8 and RNP9.

Landscape and Visual Impact

- 7.36 The site falls wholly within the Suffolk Coasts and Heaths AONB, a designation that affords the highest level of landscape protection under UK planning law. Therefore, consideration of likely impacts on landscape character and visual amenity are of prime importance. The

majority of the site has been accepted for development under the Local Plan examination process. On that basis, it is now essential to understand whether the development proposals allow the described new residential area to be integrated into the local landscape without causing significant adverse harm. This is the key element for consideration.

Policy RNP 5 (Maintaining Protection of the Countryside Around the Village) sets out that development outside the settlement boundary should protect and where possible enhance the natural beauty and special qualities of the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty in accordance with Policy WLP 8.35 of the adopted Waveney Local Plan. RNP5 also identifies the most-valued areas of the countryside where development should generally be avoided; however, the application site does not fall within one of those designated areas set out in the RNP appendix maps.

7.37 An important consideration is the findings of the Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study. This concluded that the land to the north and west of Reydon overall has a Low Landscape Capacity to receive development based on its Low Landscape Sensitivity rating, but Very High Landscape Value because of its AONB and Heritage Coast status.

7.38 Low Landscape Sensitivity is defined as:

The landscape is assessed as having few distinctive features and characteristics that provide continuity/time depth, and typically has limited visibility due to apparent landforms and intermittent tree cover.

7.39 Low Landscape Capacity is defined thus:

The landscape is assessed as having high landscape sensitivity and high landscape value. Large or medium-scale new development is likely to erode the positive key features and characteristics of the landscape which are desirable to safeguard in line with relevant national/local planning policy objectives. Taking into account site-specific constraints, there may be potential to accommodate some small-scale development in specific locations within the landscape with lower landscape sensitivity, subject to appropriate siting, design and landscaping mitigation.

7.40 It should be understood that this development Capacity assessment is for a much more extensive area than just the site that is the subject of the current application, and also the subject site falls outside the Heritage Coast boundary.

7.41 Landscape features that are considered to contribute to landscape sensitivity include historic field boundaries, the historic field boundary pattern especially on the western edge of the setting area, and small wooded copses. The current application site is contained within the existing field boundaries and no trees or hedgerows are scheduled for removal. In other words, although the Landscape Sensitivity Study is acknowledged, it should be understood that the application site itself does not have the key sensitive landscape characteristics that are noted in the report, and where they exist around the margins, they are not at risk. The application notes the visually sensitive edge along its western margins, and this is accommodated in the proposed site layout and parameter plans with open space shown along this western sector, and no built residential development proposed that will prejudice the health of retained mature trees around the site edges.

7.42 The Waveney Local Plan Inspector recorded his findings on the inclusion of this site in the allocations plan as follows:

"Although the site is an agricultural field it is surrounded on two and a half sides by existing residential development. Moreover, the topography of the area means that it would not appear as an obvious or strident protrusion of development into the surrounding countryside. Bearing in mind the landscaping which is required by policy WLP6.1, I envisage that development of the site would be likely to cause only limited harm to the landscape and scenic beauty of the AONB."

7.43 Policy WLP6.1 states (inter alia) that:

- Development should respect the character of the surrounding Area of Outstanding Natural Beauty. This includes planting trees and hedges to the west of the site and limiting the height of new dwellings to no more than two storeys.
- A landscaping scheme should be prepared to integrate the site within the landscape.
- Development should retain existing trees and hedgerows that line the edge of the site.

7.44 This proposal involves development of land to the west of the existing western settlement boundary of Reydon. As such the development site is bounded by the existing settlement edge to the east and also to the south, as well as partially to the north. Apart from the southern site boundary, these existing settlement edges sharply abut the open farmed landscape and present a somewhat visually harsh interface with the open landscape. The proposed development layout - enclosed as it is on two sides and partially on a third - makes proper reference to the sensitive western edge of its extent by including an undeveloped open space landscape corridor along its western boundary. This is not intended to be a solid barrier of vegetation and it will allow both views out for some of the residents of adjacent houses, as well as glimpsed views in from the surrounding landscape, but it will contain much of the visual impact of the new development from views to the west; views still from within the AONB. Planting will need to be typical of the local prevailing landscape character and will largely comprise native hedge and tree species to supplement the existing vegetation. Elsewhere within the development, a relatively low housing density will allow the inclusion of internal open green spaces (including a large central open green space) which will include tree planting which will further reduce the visual impact of the new housing. Views of St Margaret's Church are retained from the central open space which reinforces visual links with the surrounding landscape. It is also proposed that the eastern boundary be well planted with trees which, together with the SUDS drainage swale in the NE sector of the site, will help to break up the overall built up area of Reydon. A central East/West swale further breaks down the new built up area. The eventual success of these open spaces and their associated new planting will depend a lot on their respective planting details, but provided that these pay due regard to the prevailing surrounding landscape character, officers are satisfied that the overall landscape and visual impact of this proposal will not create any significant landscape or visual impacts on the surrounding sensitive landscape of the AONB. That said, it is duly acknowledged that the change from open farmland to residential development is a significant landscape impact in its own right, but that issue was given due consideration at the examination stage of the planning process, and the Local Plan Inspector did not raise any undue concerns in this regard.

- 7.45 In the event of planning permission being granted, any finalised development layout will need to pay due regard to the root zones of all surrounding mature trees that fringe the site and whose root zones extend into the site. Where this occurs, these root zones must be given full protection during the construction stages of the development, and full accordance should be given to the guidance contained in BS5837:2012 - Trees in Relation to Design, Demolition and Construction. Such matters will need to be confirmed at Reserved Matters stage, as will details of the landscape proposals.
- 7.46 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 AONB. The site area extending beyond the allocation is not considered to result in additional impact on the protected AONB landscape beyond development of only the allocated land. The land use and green infrastructure parameter plan establishes a 'green' western edge to the development - and one could argue that the western site edge aligning with the existing field boundary (and PRoW) represents a logical edge to the site that utilises a natural landscape feature, rather than artificially restricting the width of the site. For the reasons given, the proposal accords with the objectives of Policy RNP 5 (Maintaining Protection of the Countryside Around the Village), WLP8.35 (Landscape Character), and paragraph 176 of the NPPF, which gives great weight to the conservation and enhancement of landscape and scenic beauty in the Areas of Outstanding Natural Beauty.
- 7.47 Some local objections to the scheme set out that there are not exceptional circumstances to justify this proposed major development in the AONB. The majority of the application site is allocated for the development of 220 homes, and with decision-taking being accordance with the Development Plan, the principle of major housing development in this location is established through the site allocation, and that principle cannot be set aside using paragraph 177 of the NPPF. In any case, for the reasons set out, the proposal would not have any significant adverse landscape or visual impacts on the surrounding sensitive landscape of the AONB or any such impact that should prejudice approval of these proposals.

Design Considerations

- 7.48 Allocation policy WLP6.1 provides criteria on how development of the site should come forward. Policies WLP8.29, 8.30, 8.31 and 8.32 also provide broader design guidance.

Policy RNP 10 (Reydon Neighbourhood Design Principles) sets out that:

New development should take account of the following design principles as appropriate to their scale and use:

- a. The location, scale and design standard of all new development should retain or enhance the character and setting of the village;*
- b. New buildings should be highly energy efficient, meeting or exceeding government policy for national technical standards and those required by Local Plan policy WLP 8.28;*
- c. New dwellings should be modest in character and reflect historical Suffolk countryside styles and/or the features and colours of the landscape in their design but without creating a pastiche approach;*
- d. New developments should include sympathetic use of tree and hedge planting to soften their impact and include green areas and use of hedging and trees within the built area;*

e. Development proposals should incorporate into their design features which maintain or, if possible, provide gains to biodiversity. Landscaping and planting should encourage wildlife, connect to and enhance wider ecological networks, including nectar-rich planting for a variety of pollinating insects and provision for nesting birds such as swifts. Divisions between gardens, such as walls and fences, should be designed to enable movement of species such as hedgehogs between gardens and green spaces. Existing ecological networks should be retained.

7.49 NPPF Chapter 12 sets out how well-designed places can be achieved:

- High quality design is a key aspect of sustainable development (para. 126);
- *"Planning decisions should ensure that developments:*
- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."* (para. 130), and
- *"Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵², taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."* (para. 134).

7.50 This application is made with details of appearance, landscaping, layout and scale reserved for future determination. However, the Design and Access Statement (DAS) has been updated since its original submission to reflect the revised layout and integral design guidance which has come about since officer engagement with the agent. The purpose of the revisions was to ensure that a more site-responsive layout reflecting contextual attributes was embedded in any consent by which to guide future development of the site and, specifically, any subsequent application to approve Reserved Matters. These attributes included views, edges, potential routes and broad character areas including open spaces.

7.51 In respect of the Design and Access Statement, officers can provide commentary on some of its individual, key sections:

Contextual assessment

7.52 This section of the DAS provides a well-considered overview of the site's surroundings at the north-western edge of Reydon. It includes a summary of the settlement's physical development over several centuries and illustrates how its form has arisen from the aggregation of three historic dispersed but co-located hamlets. These have merged over time and have been significantly extended in the second half of the twentieth century to form the present-day settlement. As such, therefore, the area lacks the attributes of other kinds of historic settlement in terms of a single village nucleus - the church, the green or the marketplace - or a planned form (some of which elsewhere originate in the 13th century, for example). It is fair to describe the settlement's typology as formed of historic hamlet clusters with infilled development between, providing distinct character areas. It is interesting but not at all unusual that the village has migrated away from its parish church (Reydon St Margaret's) which is now in a semi-isolated position to the north-west.

7.53 The DAS also provides a good overview of relevant and key attributes of the settlement including movement, facilities and open spaces. In respect of key facilities such as the school, health centre, village hall and shops, these are dispersed rather than nucleated, reflecting the true village pattern. They are all, however, eminently accessible from the application site on foot. The DAS also shows that the site is potentially well connected into the village through existing vehicular and pedestrian connections along the eastern and northern boundaries and via public footpaths to the western and southern boundaries.

7.54 Officers welcome that the DAS provides an analysis of what it calls the materiality of Reydon and includes reference to the AONB unit's colour guidance. The DAS identifies the dominant local building typologies and the broad variety of materials and colour palette associated with the local residential character. It is fair to say that what is characteristic in Reydon is the lack of a uniform architectural style, typology, colour or material choice. What is consistent, however, is scale - never more than two or two-and-a-half storeys - and semi-urban character. Reydon does not enjoy a traditional Suffolk village character, and this reflects the majority of its development being 19th and 20th centuries.

7.55 The contextual analysis of the DAS could have benefited from greater depth including the identification of key views and characterisation of the site's edges. These aspects now contribute to the site layout but appeared to do so to a lesser degree at submission stage. However, the contextual analysis does demonstrate that the application site is an excellent choice for development in terms of its very good connectivity; its adjacency to matching residential uses; its close proximity to key facilities; its accessibility to attractive surrounding landscape of AONB quality; and its scale, by which officers mean that, although a large site relative to the settlement, it is not disproportionately large. The application site lacks constraints in terms of integral features (trees or tree groups, ponds, historic structures etc) or significant topography and this means that external features (edge conditions and axial or vista views) should be used as organising elements in any layout.

7.56 The aerial sketch perspective on page 25 is an excellent illustration of the potential that this site has to offer an attractive, integrated and intelligent layout. Any final design, of course,

may not look like this but, as an illustration of how this number of dwellings can be laid out in a site-responsive way, officers judge this to set an acceptably good standard for future guidance.

Place-Shaping Principles

- 7.57 The Place-Shaping Principles set out from page 26 form a coherent and clear narrative on the key influences and design derivations that are used to provide for a place-making layout. These include: treatment of the site's edges where they abut the countryside and existing built form; creation of new accessible open space and connections to it and through it to surrounding routes/spaces; views to St Margaret's church which form an organising axis to a key area of the layout; multiple access points to connect the layout outwards; and the facilitation of aspect and view within and without the site to create overlooked, attractive and safe spaces. Officers judge that these are all key contributors to a well-considered illustrative layout and have been correctly identified here and positively applied. Any subsequent layout submitted at reserved matters stage must apply the same degree of consideration to ensure officer support and its success.

Principles of Design

- 7.58 The elaborated design principles on page 36 are eminently supportable and should be made to form the basis of any future detailed design. They are somewhat generic in the sense that they could be applied to most kinds of layout but are, nonetheless, supportable for that.
- 7.59 The vehicular movement strategy that supports the related Parameter Plan (which is discussed below) is sound. The looped connection of the two separate and well-spaced site entrances will ensure a well distributed pattern of vehicles throughout the site and which itself is a key organising feature of the layout. It should also be an attractive route to use, possibly linking - as suggested here - the built areas with a large central open space. The other strategies described and illustrated in this section are useful in exemplifying and amplifying a selected design approach based on the preceding Design Principles. This is not necessarily the only way of designing development at this site, of course, but they do highlight key considerations and an acceptable approach.

Shaping the Character

- 7.60 In respect of the section on Shaping the Character (p48ff), officers consider that the criteria articulated here constitute specific and sound guidance on how a scheme can be detailed that responds to differing site conditions e.g. along the countryside edge; in the centre of the layout; where it abuts existing residential development.
- 7.61 The precedent/exemplar images are useful, and they are helpfully cited for future reference; and the illustration sketches provide a general impression of how a development may appear. They probably do little other than illustrate that the development will maintain and extend the semi-urban character of Reydon but that is entirely appropriate.
- 7.62 Officers were heavily involved in articulating these headings and criteria and judge it important that they are embedded in any permission, such that they benchmark any future detailed application in respect of detailed design quality. The recommended conditions

detail how that would be achieved to require reserved matters detail accords with these key elements of the DAS.

Parameter plans

- 7.63 The Movement and Access Parameter Plan identifies fixed access points for pedestrians and vehicles; the determining position of the vehicle route through the site that links the two existing access points north and east; suggested pedestrian access points; and rights of way. Officers judge that these parameters are correctly identified and are in suitable positions.
- 7.64 The Massing and Scale Parameter Plan identifies approximate site areas of development and their associated massing and scale. It fixes a key gradient of density (in effect) across the site such that it is densest close to existing built form along the eastern boundary; least so along the southern edge adjacent the existing low scale dwellings; and mixed scale everywhere else which can allow for very low density along the countryside edge and a rather higher density around the central green open space, for example (or not, subject to a future designer's preference). In this way, this plan builds in an important level of flexibility whilst fixing a scheme that will respect its neighbours in terms of massing and scale.
- 7.65 The Land Use and Green Infrastructure Plan fixes areas of built development and those reserved for green (and blue) infrastructure. To be clear, all of the allocated site (including the additional westernmost area included within this application) represents a development site. Whether the site is developed for housing and/or developed for green open space, it is development. Green open space as part of a housing development is not undeveloped land and it is not countryside either, in terms of use or character. Green open space should not be considered to be some kind of countryside buffer that gets transposed into useless swathes of green edge when really it should be spatially dispersed within and part of the built layout. That is why officers are satisfied that, through negotiation, the final parameter plans and design principles move away from that included at the time of submission and have significantly improved along the lines described above. One of those changes relates to the location of the equipped play area, which policy WLP6.1 promotes as being on the northern edge of the site and adjoining the existing play area at Barn Close, with a further (smaller) play area to the southern end of the site. Whilst in theory those policy objectives make some sense, in practice when considering illustrative layouts and associated parameter plans, it became clear that such locations of play space would not integrate well into a site layout. One of the requirements in the preamble to WLP6.1 is that the play space on the site should be *“designed and located so as to be overlooked by surrounding properties to provide natural surveillance and be well landscaped to create an attractive space”*. The parameter plan that fixes that main area of play space within a central location, enclosed by built residential development – and linked to the southern and western PRow by green corridors – will ensure the play area is integrated into the layout; well surveilled; and easily accessible to both new and existing residents. Thus, whilst there is some conflict with WLP6.1 in terms of the location of the play space, it would exceed the minimum size requirements set down in the policy and meet all the other objectives of achieving high quality design. Officers are therefore satisfied that the Land Use and Green Infrastructure Plan sets appropriate parameters for the site to guide detailed reserved matters proposals.

Conclusions on Design

7.66 For the reasons given above, officers consider that the parameter plans, in addition to the design principles within the DAS, demonstrate that the site can be developed in a way that will deliver a high-quality residential development in accordance with WLP6.1 and the design objectives of the Local Plan, NPPF, and RNP10 of the Reydon Neighbourhood Plan. It will also provide areas of open space on site in accordance with WLP1.3 and WLP8.30 of the Local Plan. For an outline application, officers consider that an appropriate balance has been struck between providing comfort to the decision-taker that a high-quality design will be delivered, whilst at the same time not stifling designer creativity at reserved matters stage. The effort that has been made to fix certain elements of the design approach to guide reserved matters applications also should provide assurance that the site area extending farther west, beyond the allocation, is not just acceptable - but actually allows for any final development design to better integrate into its built and landscape context. In making this assessment, officers have had clear regard to the 2021, updated NPPF, and its aspirations for beautiful buildings and places (amongst other things); the National Design Guide; National Model Design Code; and Building for a Healthy Life. It is considered that the scheme meets those high-quality design objectives and is a good example of how a major housing development can be brought forward with good design embedded in an outline scheme to ensure a high-quality outcome at future reserved matters stage.

Heritage Considerations

7.67 The Planning (Listed Buildings and Conservation Areas) Act 1990 ("The Act") sets out, in section 66, the statutory duty of decision-takers in respect of listed buildings:

"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

7.68 This statutory requirement is reflected in the objectives of Local Plan policy WLP8.37 and also chapter 16 of the NPPF which sets out (inter alia):

- That heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (para. 189);
- That applicants should describe the significance of any heritage assets affected, including any contribution made by their setting (para. 194);
- That great weight should be given to the conservation of heritage asset's and, the more significant the asset, the greater the weight should be (para. 199);
- That any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification; and
- That where harm would arise, it must be properly weighed against the public benefits of the development (paras. 201 & 202).

7.69 The applicant has provided a Heritage Impact Assessment (HIA) that meets the requirements of NPPF paragraph 194. Historic England have also been consulted on the application but have no comments to make on the application. In considering heritage matters, Officers have had regard to East Suffolk Council's Historic Environment SPD (adopted June 2021).

- 7.70 There are two listed buildings, the setting of which are affected by this development proposal. These are the Grade II listed Gorse Lodge Farm close to the south-west corner of the site; and the Grade II* St Margaret's Church at some distance from the north-west corner of the site but linked to it by a public footpath.

Gorse Lodge Farm

- 7.71 The farmhouse (now two dwellings) is mid-17th century in origin and is timber-framed with a pantiled roof and two storeys and attic. It originated as a typical 3-cell vernacular Suffolk farmhouse and has some attractive features that contribute to its special interest including chamfered beams and a sawtooth stack. Its principal elevation does appear to face away from the development site which implies that its historic association with it in terms of ownership and use may be relatively limited. Nonetheless, the development site does form part of the wider landscape setting to the farmhouse that contributes generally and importantly to the farmhouse's significance and loss of part of that setting will erode its contribution and harm its significance, thereby.
- 7.72 Officers agree with the submitted Heritage Statement that this harm will be less than substantial but will need to be given great weight by the decision-taker and weighed against the public benefits of the development proposal, pursuant to the NPPF paragraph 196 balancing exercise. The minor setback in the area of built development adjacent the farmhouse (as shown on the Land Use and Green Infrastructure parameter plan) offers some potential mitigation and complies with a criterion of WLP6.1 to limit the impact upon the setting of Gorse Lodge; however, it does not balance out the overall loss of the farmed landscape in this area of the farmhouse's setting. The farmed landscape will still be apparent to the immediate north, west and south of the farmhouse, such that the current proposal is not some kind of development 'tipping point', in the view of officers.

Reydon St Margaret's Church

- 7.73 In respect of the parish church of St Margaret's, this building derives its significance from its medieval origins albeit with much Victorian restoration. It now stands semi-isolated from Reydon which appears to have migrated from it some time ago. Modern development along Wangford Road is having an encroaching effect which could be styled as a reclaiming effect, such that the church may yet end up being part of the village, once again. Thus, whilst it is arguable that the application site forms part of the landscape setting to the church, once developed it will only have the effect of bringing Reydon back somewhat closer to its parish church. Such an outcome is one about which officers have no particular concerns.
- 7.74 Most medieval churches are relatively modern buildings that occupy the sites of what started off as private manorial chapels following the Anglo-Saxon Conversion of the seventh century. Thus, these sites predate their current buildings by as much as six or seven centuries - time enough for villages to migrate away from these fixed sites towards better transport routes or interconnections (early medieval buildings were portable and of limited lifespan). Perhaps that is what happened in Reydon.

Conclusions on Listed Building Impact

- 7.75 To a large extent the Council (and Planning Inspectorate) has already considered and accepted the principle of residential development of the majority of the site within the

setting of these listed buildings through the adoption of site allocation policy WLP6.1. In any event, officers have considered the outline proposals, inclusive of parameter plans and illustrative layout plans, and consider that the harm to the significance of proximate listed buildings is limited to a low level of less than substantial harm to the significance of Gorse Lodge Farmhouse. That harm, even though low, will need to be given great weight in the balance by the decision-taker and properly weighed against the public benefits that would accrue from this development proposal. For the purposes of the officer recommendation, that planning balance is set out in the concluding section of this report.

Archaeology

- 7.76 This site is situated in an area of archaeological potential recorded on the County Historic Environment Record. It is located on the edge of Reydon Common which was a focus for medieval activity, and findspots of medieval date have been recorded around the proposed development area. Various cropmark sites have been identified in the vicinity and archaeological investigations to the west defined archaeological remains of prehistoric date. A geophysical survey of the development area, carried out during the determination period, has identified a number of anomalies which are likely to be archaeological in origin. However, this site has never been the subject of systematic below ground archaeological investigation and there is high potential for previously unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.
- 7.77 There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed. With conditions, the archaeological impact would be acceptable in accordance with the NPPF and policy WLP8.40 (Archaeology) of the Local Plan.

Affordable Housing, Housing Mix and Self-Build

- 7.78 Policy WLP8.2 (Affordable Housing) of the Local Plan sets out the Council's strategy to deliver affordable homes over the plan period in accordance with the NPPF. The Southwold and Reydon area is the most viable of the Waveney plan area and therefore developments can provide 40% of the site as affordable housing. This is a requirement of the policy and applicable to the application site. Policy RNP1 (Tenure Mix of Affordable Housing) sets out that any development providing Affordable Housing must contain at least 50% of Affordable Housing for affordable rent and the remainder to be Shared Ownership housing; the exact proportion shall be agreed at the time of the planning application to reflect the current assessment of housing need.
- 7.79 The Council's Housing Team has provided guidance on the appropriate mix for this development proposal, which would provide 88 affordable homes. The breakdown of those 88 homes is tabled below, and such provision would need to be secured by a S106 legal agreement.

Table: Affordable Housing Mix			% of 44 total Shared ownership and Shared Equity	
No. of Bedrooms	House Type	% of 44 total Affordable rent	Shared Ownership %	Shared Equity %
1 bed	Flat	48%		
1 bed	Bungalows	7%		
2 bed	Bungalows	20%		
2 bed	House	25%		
1 bed	Flat		50%	
2 bed	House			27%
3 bed	House			22%

7.80 The affordable housing provision set out above is a policy compliant mix and a public benefit of this scheme that should carry substantial weight in the balance.

7.81 The scheme accords with RNP1 - providing 50% of the affordable homes as affordable rented properties. The remaining 50% are split between shared ownership and shared equity in order to meet the need identified by the Council's Housing Team.

7.82 Policy WLP8.3 of the Local Plan requires that developments of 100 or more dwellings will be expected to provide a minimum of 5% self or custom build properties on site through the provision of serviced plots. A provision of 11 self-build plots would be secured as an obligation in the S106 legal agreement in accordance with the policy.

7.83 88 of the dwellings would be affordable homes, with the tenure controlled by S106 legal agreement. A further 11 self-build plots, and 7 plots set aside to provide a relocation/replacement option for development affected by coastal erosion, would also be controlled by S106 legal agreement. Thus, over 100 of the proposed dwellings would be controlled in terms of their occupancy.

7.84 Policy RNP4 of the Neighbourhood Plan covers the Principal Residence Requirement, setting out that:

"New open market housing, excluding replacement dwellings, will be supported only where there is a restriction to ensure its occupancy as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.

Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. The condition on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when East Suffolk Council requests this information.

Proof of Principal residence is via verifiable evidence which could include, for example (but not limited to), residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc)."

- 7.85 As the RNP has now been formally made, the policies therein are to be given full weight when determining this application. When the application was considered by the Planning Committee (North) in March 2020, the RNP was at a relatively early stage of the plan-making process whereby its policies were only given limited weight by officers. Given that the RNP now forms part of the Development Plan, policy RNP4 – and its requirement for a principal residence restriction – applies in the case of all new housing development, unless material considerations indicate otherwise.
- 7.86 The applicant has agreed to a Principal Residence Restriction being applied to the development, by condition, in the event planning permission is granted. This would accord with the RNP and also addresses a key concern set out previously by Reydon Parish Council.

Relocation and Replacement of Development Affected by Coastal Erosion

- 7.87 Policy WLP8.26 relates to the 'Relocation and Replacement of Development Affected by Coastal Erosion' and identifies that a significant number of residential properties are at risk from coastal erosion within the next 100 years, and that a small number of properties at Easton Bavents are at the most imminent risk with a number of properties already being lost to erosion over the last 5 years. It is a key objective of the Local Plan, in accordance with the NPPF, to make provision for development that needs to be relocated from the coastal change management areas.
- 7.88 Under allocation policy WLP6.1, there is a unique opportunity to set aside land for the relocation of properties at risk (or already lost) from coastal erosion to a sustainable location. One of the criteria of the policy is that seven plots (equal to those which have been lost since 2011) should be set aside for relocation. Owners of properties at risk from erosion are not obliged to take on these plots. However, if they are not taken up after a period of five years following the completion of the development then the plots can be made available for the provision of affordable housing.
- 7.89 Securing the seven plots for this purpose is set out in detail in the final draft S106 legal agreement. This obligation has involved significant work between officers and the applicant team to ensure that this significant public benefit of the development proposal is delivered through any grant of planning permission. The obligation, summarised, is as follows:
- Before the Occupation of 75% of the Market Housing Units the Owners will provide a means of vehicular and pedestrian access to base course level and all available services to the boundary of the Coastal Erosion Re-location Plots in accordance with the plans and specifications to be approved by the Council;
 - Thereafter once the Coastal Erosion Re-location Plots have been laid out to the reasonable satisfaction of the Council they shall be conveyed by the Owners to the Council together with all necessary rights and easements for the consideration of £1.00 (one pound);
 - The Council shall make available the Coastal Erosion Re-location Plots to Eligible Coastal Residents for the consideration of £1.00 (one pound) for a minimum period of 5 years from the date of the transfer;

- In the event a Coastal Erosion Re-location Plot is conveyed to an Eligible Coastal Resident (hereinafter defined as ‘the First Transfer’) and that plot is subsequently sold within 10 years of the date of the First Transfer, an Overage Clause would apply as follows: set out in paragraphs 3.65.1 to 3.65.5 will apply:
 - If a Coastal Erosion Re-location Plot is sold within 5 years of the First Transfer the Sum equal to 50% of the Sale Price minus Build Costs will be paid to the Council;
 - If a Coastal Erosion Re-location Plot is sold between 5 years and 6 years of the First Transfer a Sum equal to 40% of the Sale Price minus Build Costs will be paid to the Council;
 - If a Coastal Erosion Re-location Plot is sold between 6 years and 7 years of the First Transfer a Sum equal to 30% of the Sale Price minus Build Costs will be paid to the Council;
 - If a Coastal Erosion Re-location Plot is sold between 7 years and 8 years of the First Transfer a Sum equal to 20% of the Sale Price minus Build Costs will be paid to the Council;
 - If a Coastal Erosion Re-location Plot is sold between 8 years and 10 years of the First Transfer a Sum equal to 10% of the Sale Price minus Build Costs will be paid to the Council;
- The Owners and the Council hereby agree that if after 5 years there is no interest in the relevant Coastal Erosion Re-location Plot then the provisions of paragraph 3 to this Schedule 3 shall cease to apply to the relevant Coastal Erosion Re-location Plot and such plot shall be utilised for Affordable Housing free from any encumbrance or provision contained within this paragraph 3.

7.90 The agreed position with the applicant, where the obligation would require the land to be transferred to East Suffolk Council, will ensure that the Council retain control over this land and can ensure it is properly made available to eligible residents and at a price (£1.00) that will make the prospect of bringing forward a relocation dwelling much more achievable. Officers have worked with colleagues at Coastal Protection East on this particular matter, and the applicant’s cooperation to help deliver this public benefit should be commended. Providing land, within an allocated housing site, to residents affected by coastal erosion as a means of relocation would be a first for this Council and would deliver on key objectives of the Planning and Coastal Management Service to support adaptation to erosion. The opportunity to provide a relocation opportunity to residential property owners affected by coastal erosion is a significant public benefit of this scheme and meets a key objective of policies WLP6.1 and WLP8.26.

Residential Amenity and Response to Publication/Consultation

7.91 Policy WLP8.29 (Design) of the Local Plan promotes development that integrates well into its context in terms of neighbour amenity and living conditions. There are objections to the proposals from a number of local residents; Reydon and Southwold Society; and Reydon Action Group for the Environment (RAGE). Reydon Parish Council made a representation on the application but do not formally object – and actually comment in their opening remarks that the proposal is consistent with the newly adopted Local Plan, whilst going on to raise points for consideration. Further comments made by the Parish Council refer to the policy requirements of the RNP.

- 7.92 When considering an outline application with details of access in full, and all other matters reserved for future determination, it is difficult to comment on precise impacts from built development within the site and how any new dwellings will relate to the adjacent environment. However, at a site area of 12 hectares, the proposed 220 dwellings would be a very low density of under 20 dwellings per hectare; for reference, allocation policy WLP6.1 promotes a density of approximately 25 dwellings per hectare. Such a low density of development – and as demonstrated on the illustrative layout – provides ample scope to develop the site in a manner that will not result in unacceptable losses of light and privacy to neighbouring residents due to separation distances; intervening existing vegetation; and areas of proposed landscaping and site drainage features.
- 7.93 As part of the parameter plans, a Massing and Scale plan has been provided and fixes a key gradient of density (in effect) across the site such that it is densest close to existing built form along the eastern boundary; least so along the southern edge adjacent the existing low scale dwellings; and mixed scale everywhere else which can allow for very low density along the countryside edge and a rather higher density around the central green open space, for example. This provides parameters and a degree of control that any detailed design is respectful of neighbouring residential uses at reserved matters stage.
- 7.94 Undoubtedly the proposal will turn agricultural land into a residential development and for some adjacent properties that represents a significant change in outlook, and a source of some of the objections received. Whilst that change is acknowledged by officers, it should be noted that the majority of the site is allocated in the Local Plan for housing development and therefore the adopted Local Plan accepts, in principle, that change in outlook. In any event, change does not represent harm to living conditions and officers consider that a well-designed, comprehensive development of the site will not appear out-of-character in this edge of settlement location. Whilst the appearance of the site will change, there will be benefits to existing, adjacent residents from improved connections through the site to existing and improved public rights of way, in addition to significant areas of accessible green open space within the site, and equipped area for play that can all be utilised by existing residents. Off-site highway works and bus stop improvements will again be of benefit to existing residents.
- 7.95 The proposed means of vehicle access into the site will of course generate traffic on Copperwheat Avenue and The Crescents. Those routes are suitable for the development traffic generation which is not likely to be so significant and adverse to justify refusal of the application. Reydon is a residential environment, and the site will form part of that, with the associated traffic and activity on the site being appropriate for that context. It is not considered that the proposal will generate significantly adverse impact in terms of noise and disturbance once complete and occupied.
- 7.96 In the construction phase there is potential for local disruption and therefore conditions to secure a construction management plan would be essential to control and reduce those impacts as far as is practically possible.
- 7.97 For the reasons given, officers consider that the proposal, in outline, does not raise significant amenity concerns. Construction impacts could be mitigated through planning conditions, and the low density of development – informed through the massing and scale parameter plan – provides ample scope for reserved matters proposals to detail a

development scheme that is respectful of the neighbouring residential environment. There is thus no conflict with the amenity objectives of WLP8.29.

Ecology and the Natural Environment

- 7.98 The application is supported by an Ecology Assessment report (Hopkins Ecology, February 2019) and the conclusions and proposed mitigation measures identified are broadly satisfactory to officers. Mitigation and enhancement measures identified in the ecological assessment report should be secured, with construction mitigation measures forming part of a Construction Environment Management Plan (CEMP) and operational mitigation, management and enhancement measures as part of a Landscape and Ecology Management Plan (LEMP). These should ensure that the final development secures significant ecological enhancements as part of its design in accordance with the objectives of WLP8.34 (Biodiversity and Geodiversity).
- 7.99 The Conservation of Habitats and Species Regulations 2017 (“Habitats Regulations”) lays down the legislation on the conservation of natural habitats and of wild fauna and flora. The Habitats Regulations require the competent authority (in this instance, the Council) to determine whether the development is likely to have a significant effect on the interest features of European sites protected under the legislation and, if there would be, to carry out an Appropriate Assessment of the implications of the proposal for the site’s conservation objectives in accordance with the regulations. The applicant has provided a ‘shadow’ Habitats Regulations Assessment to inform such an assessment and Natural England have also been consulted in their statutory role.
- 7.100 The application site is located within 13km of the following European sites:
- Minsmere – Walberswick Ramsar Site
 - Minsmere – Walberswick SPA
 - Minsmere to Walberswick Heaths and Marshes SAC
 - Benacre to East Bavents SPA
 - Benacre to East Bavents Lagoons SAC
- 7.101 The proposed development is not within 200m of those sites and is therefore not likely to directly impact upon the interest features of these European sites through habitat loss, physical damage etc. However, the emerging Suffolk Recreational Avoidance Mitigation Strategy (RAMS) sets out that new residential development within a 13km zone of influence (ZOI) of European sites is likely to have a significant effect – when considered either alone or in combination with other new housing - on the interest features of those sites through increased recreational pressure in terms of dog walking, water sports, hiking etc. Natural England recommend that a suitable per-dwelling financial contribution to RAMS is sought to offset such recreational impacts. That is secured through the S106 legal agreement as agreed by the applicant and their consultant Ecologist. The S106 agreement is ready to complete by the local planning authority immediately following resolution to grant.
- 7.102 The ‘shadow’ HRA submitted by the applicant provides an assessment of the recreational impacts of the development proposal, and further to input from the Council’s own Ecologist, an addendum to the HRA was submitted to further inform officers’ assessment of the proposals. The ‘shadow’ HRA concludes that mitigation included with the development will avoid an adverse impact on the integrity of the identified designated sites. This mitigation includes the provision of an onsite circular walking route of 1.4km and connections to

existing offsite walking areas. The Shadow HRA recognises the importance of dog walkers as key users of high value nature sites (paragraph 3.7) and specifically identifies the on-site greenspace as being of high quality. Based on Natural England guidance, the 2.7km distance for walking routes is not a recommendation rather it is the average distance of a daily dog walk: some walk further than this, others walk less. An on-site walking route around the periphery of a roughly square plot is only feasible on a site with an area at least 45ha. The scheme masterplan does allow ready access to blocks of on-site greenspace and all residents will be within the 400-500m distance which most dog walkers will walk for greenspace access. In conjunction with off-site routes the available walking routes through greenspace and farmland will be substantially greater than the mean quoted distance of 2.7km. This assessment of walking route provision is accepted by officers and will provide new residents with walking routes that limit recreational usage of European sites within the 13km zone.

7.103 Officers have undertaken a stage 2 HRA – Appropriate Assessment that concludes, for the reasons given – and with a per-dwelling contribution to the Suffolk RAMS – that the development would not result in adverse effects on the integrity of the aforementioned European sites. Natural England have considered this and concur, raising no objections in their final consultation response. Officers are content that the proposal is acceptable in this regard in accordance with WLP8.34 (Biodiversity and Geodiversity).

Flood Risk and Surface Water Drainage

7.104 Local Plan Policy WLP8.24 sets out that new housing development will not be permitted in high-risk flood areas.

7.105 Chapter 14 of the National Planning Policy Framework (NPPF) sets out planning for flood risk:

- Development should be directed away from areas at highest risk (para. 162).
- Local planning authorities should ensure that flood risk is not increased elsewhere, and applications should be supported by a site-specific flood-risk assessment. Development proposals in higher risk areas should demonstrate that:
 - Within the site development is directed to the lowest risk areas;
 - The development is appropriately flood resilient and resistant;
 - The development incorporates sustainable drainage systems;
 - Any residual risk can be safely managed; and
 - Safe access and escape routes are provided. (para. 167)
- Major developments should incorporate sustainable drainage systems (para. 169).

7.106 The policy approach at a national and local level generally, therefore, is to make developments safe for all future occupiers through appropriate siting and design; and then ensure no adverse local impacts arising from the development through ensuring that development sites are well-designed incorporating sustainable drainage systems.

7.107 The application site is located in environment agency flood zone 1 (the lowest risk area) and therefore sequentially preferable for residential development, hence the allocation within the Local Plan.

- 7.108 In terms of surface water drainage, the outline proposals demonstrate that the development can be properly drained. The main strategy across the site is the utilisation of a swale corridor to benefit the dispersal of surface water, with an attenuation basin in the north-eastern area of the site (the low point) to accommodate the safe holding of water in an extreme weather event. As an outline application with all matters (save for access) reserved, this is an indicative strategy although one that has been reviewed extensively by the Local Lead Flood Authority (LLFA) at the County Council.
- 7.109 It should be noted that whilst the precise, technical details of the drainage strategy would come forward as part of reserved matters applications, the 'Land Use and Green Infrastructure' parameter plan supporting this application sets the locations of the primary drainage attenuation basin (wetland park); and also the secondary drainage attenuation (swale corridor) as key aspects of the proposal. Therefore, the main elements of the drainage strategy would be fixed through a grant of outline planning permission with conditions requiring the development to be in accordance with the approved parameter plans, offering clarity on where key drainage features would be located and how any built layout would need to be organised around those features.
- 7.110 The LLFA recommend approval of the application subject to conditions securing the precise drainage strategy concurrent with reserved matters applications, and longer term ensuring its delivery and maintenance for the lifetime of the development.
- 7.111 The proposal accords with the flood risk prevention/limitation objectives of the NPPF and policy WLP8.24.

Other Matters

- 7.112 A criterion of WLP6.1 is that any planning application is supported by evidence which assesses the quantity and quality of sand and gravel resources within the site in order to determine whether it is practical to make use of resources on site. This has been provided and the County Council Minerals and Waste Planning Team consulted. The geotechnical site investigation report prepared by RPS Consulting Services Ltd is considered appropriate to assess the sand and gravel resources within the site. It identifies that the material throughout the site is variable, however the county council consider there is material on site that could be used in the construction of the development. A condition would need to be applied accordingly.
- 7.113 The Council's Environmental Protection Team has requested further ground contamination investigation through a phase II survey. This – along with any required remediation works – should be secured by condition, should planning permission be granted.
- 7.114 In terms of foul drainage, the applicant has engaged with Anglian Water regarding connections to the sewerage network from the proposed development. The existing network requires upgrades to facilitate the development proposal, but through that pre-application engagement, Anglian Water has identified potential mitigation solutions to provide capacity within the foul water network to take the proposed flows from the site. That will need to be progressed with the infrastructure provider outside the planning process, but it has been demonstrated that the necessary infrastructure upgrades can be achieved to facilitate the development proposal.

Public Benefits of the Proposed Development

7.115 The proposed development would deliver significant public benefits including (inter alia):

- Up to 220 homes in a sustainable location as part of the plan-led approach to growth in the District;
- 88 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 Reydon and Southwold from new resident spend in the economy;
- Seven plots to be made available for property owners whose properties are at risk (or already lost) to coastal erosion in the locality;
- Up to 11 plots to be made available for 'self-build' homes;
- Improvements to the public right of way on the southern edge of the site, providing better connectivity between Kingfisher Crescent and Wangford Road;
- Substantial areas of green infrastructure and equipped play space for new and existing residents;
- Improved connections to the existing network of public rights of way to the south and west of the site;
- Improvement works to local bus stops;
- Footway improvements along Wangford Road; and
- A new pedestrian crossing on Wangford Road.

8. Conclusion

8.1 Officers consider that the proposed development accords with the plan-led approach to deliver housing growth in the Reydon and Southwold area, delivering substantial public benefits as set out above. The extended site area beyond the allocated land is somewhat of a departure from WLP6.1 but one that, ultimately, will facilitate a more integrated and higher quality residential development in terms of, among other things, connectivity with the Public Right of Way network; provision of green infrastructure; provision of sustainable drainage features; and the overall density of development appropriate for the site location within the Suffolk Coast and Heaths AONB.

8.2 The proposals demonstrate that the site can be developed in a way that will deliver a high-quality residential development in accordance with WLP6.1 and the design objectives of the Local Plan, RNP, and NPPF. The effort that has been made to fix certain elements of the design approach to guide any future reserved matters applications should provide assurance that the site area extending farther west, beyond the allocation, is not just acceptable - but actually allows for any final development proposal to better integrate into its built and landscape context. This is particularly important in the AONB and should be supported as an example of how a major housing development can be brought forward in this context.

8.3 It is acknowledged that the proposal will see agricultural land change to a residential development of the site, and that is not supported by some local residents. Those concerns raised have been given due consideration by officers but do not, in the balance, indicate

that planning permission be refused. Many of the matters raised can be addressed either through appropriate planning conditions or proper consideration of detailed design at reserved matters stage.

- 8.4 The proposal would give rise to a low level of less than substantial harm to the significance of the grade II listed Gorse Lodge Farmhouse. That harm, even though low, will need to be given great weight in the balance by the decision-taker and properly weighed against the public benefits. However, officers consider that this proposal delivers numerous and substantial public benefits that would significantly and demonstrably outweigh any harm that would arise.
- 8.5 The proposal is considered to represent sustainable development in accordance with the objectives of the National Planning Policy Framework (2021) and the Development Plan as a whole. There are no significant, or unacceptable environmental impacts arising from the proposals. There are also substantial public benefits that would otherwise justify approval as detailed above. Planning permission can therefore be granted.

9. Recommendation

9.1 **AUTHORITY TO APPROVE** with conditions (as set out in section 10), and subject to the completion of a S106 Legal Agreement to secure the following obligations:

- Provision of 40% of the dwellings as affordable homes;
- Provision of seven plots as part of relocation offer for properties lost/at risk to coastal erosion;
- 5% of the residential development as self-build plots;
- Per-dwelling contribution to the Suffolk RAMS;
- Provision and long-term management of public open space;
- Financial contribution to fund secondary school transport;
- Financial contribution to fund improvement works to local bus stops;
- Travel Plan financial contribution; and
- Financial contribution to fund road safety engineering schemes at local accident cluster sites.

10. Conditions:

1. Approval of the details of the siting, design and external appearance of the buildings, and the landscaping of each phase (hereinafter called "the reserved matters") shall be obtained from the local planning authority in writing before any development is commenced on that phase. Development shall be carried out as approved.

Reason: This condition is imposed in accordance with Section 92 of the Town and Country Planning Act 1990.

2. Application for approval of the reserved matters shall be made to the local planning authority before the expiration of three years from the date of this permission.

The development hereby permitted shall be begun either before the expiration of five years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason: This condition is imposed in accordance with Section 92 of the Town and Country Planning Act 1990.

3. Prior to the submission of the first reserved matters application(s) a site wide Phasing Plan shall be submitted to the local Planning Authority for approval. No development shall commence until such time as the site wide Phasing Plan has been approved in writing by the Local Planning Authority.

The site wide Phasing Plan shall include the sequence of providing the following elements:

- a. All vehicular and pedestrian accesses; the primary estate roads; segregated footpaths and cycle ways; any temporary footpaths and access connections during the construction period; the on-site circular walking route of 1.4km; and the timings of such provision, with recognition of other conditions triggering access completion.
- b. Residential development parcels, including numbers; housing type and tenure; location of self-build plots; and location of the 7no. plots to be set aside for properties lost to coastal erosion.
- c. Surface water drainage features, SUDS and associated soft landscaping.
- e. Accessible natural green space, structural landscape planting on the western edge of the site, and Local Equipped Play Area (LEAP).
- f. Improvement works to the southern public footpath.
- g. Ecological mitigation and enhancement measures.

The site wide Phasing Plan shall be implemented as approved.

Reason: To ensure that key elements of the approved development are delivered at the right time in the interests of securing a sustainable form of development.

4. Means of vehicular access into the site are hereby approved and shall be carried out in accordance with drawing number 1509 03/001 Rev B, received 12 June 2019; and the Movement and Access Parameter Plan (drawing number 18 050 02), received 27 November 2019.

Reason: To ensure that the site is served by safe and suitable vehicular accesses in the interests of highway safety and in accordance with the site allocation objectives of policy WLP6.1 of the Local Plan.

5. The submission of reserved matters applications pursuant to this outline application shall together provide for up to 220 dwellings and demonstrate substantial compliance with the Movement and Access Parameter Plan (drawing number 18 050 02); Land Use and Green Infrastructure Parameter Plan (drawing number 18 050 04); and Massing & Scale Parameter Plan (drawing number 18 050 03), all received 27 November 2019.

Reason: The site is located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and therefore in order to secure high-quality design and properly mitigate landscape and visual impact, it is essential to establish development parameters to guide future

reserved matters application, in accordance with the design and landscape objectives of Local Plan policies WLP8.29 (Design) and WLP8.35 (Landscape Character).

6. All reserved matters applications shall incorporate the relevant elements of the 'Shaping the Character' principles of section 5.4 of the Design Access Statement, demonstrating broad compliance with the design intent reflected on pages 48-49 (Farmland heritage); pages 50-51 (Rural settlement); and pages 52-53 (Village edge) of the Design and Access Statement. Each reserved matters application shall be accompanied by a statement demonstrating this.

Reason: To ensure that the master planning principles of this permission inform detailed designs and in the interests of delivering a distinctive, attractive and sustainable development with high quality design appropriate for the AONB.

7. As part of the reserved matters application(s) for layout and landscaping, plans and particulars of the pedestrian access points on the southern, western and northern site boundaries (if relevant to the relevant phase), as shown on the Movement and Access Parameter Plan (drawing no. 18 050 02), shall be submitted to and approved in writing by the Local Planning Authority. The details submitted shall include the following:

- (a) the precise location of the pedestrian access points;
- (b) the route of the pedestrian accesses and their integration into the development layout;
- (c) details of any engineering works required to create the accesses; and
- (d) the ground surface treatment of the accesses and any associated landscaping.

Development shall be carried out in accordance with the approved details and the pedestrian access points shall be completed and made available for use in accordance with the triggers approved in the site wide phasing plan under condition 3.

Reason: to ensure that the final development layout incorporates pedestrian connections to the existing public right of way network and residential environment in the interest of creating an integrated and sustainable development.

8. No dwelling shall be occupied until the opening has been formed on the northern site boundary to facilitate the delivery of the pedestrian connection into the existing play area at Barn Close. The completion of the pedestrian access point shall be in accordance with the details approved under condition 7 and the site wide phasing plan approved under condition 3.

Reason: connectivity between the site and the existing play area is a critical element of the proposals, as required by site allocation policy WLP6.1. In order to ensure the delivery of this pedestrian connection the opening must be formed at an early stage of the development.

9. No part of the development shall be commenced until full details of the proposed access and tie-in works shown on Drawing No. 1509 03/001 Rev B have been submitted to and approved in writing by the Local Planning Authority.

The approved access from Copperwheat Avenue shall be laid out and constructed in its entirety prior to occupation of the first dwelling. Both approved accesses (from Copperwheat Avenue, and The Crescents) shall be laid out and constructed in their entirety prior to occupation of the 101st dwelling.

Thereafter the accesses shall be retained in the approved form.

Reason: To ensure that the accesses are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety. The condition is necessary in acknowledgment of the requirement for detailed, technical matters to be agreed through S278 Agreement with the Highways Authority.

10. No part of the development shall be commenced until full details of the proposed pedestrian crossing and other off-site highway improvements (including footway widening, crossing points and traffic calming) shown on Drawing No. 1509 03/001 Rev B, have been submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be laid out and constructed in its entirety prior to occupation of the first dwelling.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety. The condition is necessary in acknowledgment of the requirement for detailed, technical matters to be agreed through S278 Agreement with the Highways Authority.

11. No part of the development shall be commenced until details of improvements (including widening of the useable width and surfacing) to Footpath 2 – to the south of the site, and also the section between the site and Wangford Road to the northeast - have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety in accordance with the trigger point identified in the approved phasing plan under condition 3.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of sustainable travel and recreational benefit.

12. Prior to occupation of the 101st dwelling, Footpath 2 (within the southern section of the site, and also the section between the site and Wangford Road to the northeast) shall be converted to a public bridleway.

Reason: To ensure that the necessary legal requirements to enable sustainable travel are made available for use at an appropriate time of the development in the interests of sustainable travel and recreational benefit.

13. As part of each reserved matters application for layout, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

14. No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details, unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

15. As part of each reserved matters application for layout, details of the areas to be provided for the loading, unloading, manoeuvring and parking of vehicles shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose unless otherwise approved by the Local Planning Authority.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

16. As part of each reserved matters applications for layout, a plan indicating the positions and design of secure covered and open cycle storage facilities shall be submitted to and approved in writing by the Local Planning Authority. The cycle storage facilities shall be provided prior to occupation of each respective residential unit. The development shall be carried out in accordance with the approved details.

Reason: In the interests of sustainable development to ensure that residential occupiers of the site have the ability to own, use and securely store cycles as a means of transport.

17. No development shall take place within a phase until the implementation of a programme of archaeological work has been secured for that phase, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with policy WLP8.40 of the Local Plan.

18. No building shall be occupied on a phase until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority for that phase, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 17 and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with policy WLP8.40 of the Local Plan.

19. Concurrent with the first reserved matters application(s) for a phase a surface water drainage scheme for that phase shall be submitted to, and approved in writing by, the local planning authority.

The scheme shall be in accordance with the approved FRA and include:

- a. Dimensioned plans and drawings of the surface water drainage scheme;
- b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
- c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall event including climate change as specified in the FRA;
- d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
- e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
 - i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
 1. Temporary drainage systems

2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 3. Measures for managing any on or offsite flood risk associated with construction
- h. Details of the maintenance, management and adoption of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.

The scheme shall be fully implemented as approved.

Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

20. The development hereby permitted on a phase shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register for that phase.

Reason: To ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

21. No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) for a phase approved by this planning permission, shall take place on that phase until a site investigation consisting of the following components has been submitted to, and approved in writing by, the local planning authority for that phase.

The intrusive investigation(s) shall include:

- the locations and nature of sampling points (including logs with descriptions of the materials encountered) and justification for the sampling strategy;
- an explanation and justification for the analytical strategy;
- a revised conceptual site model; and
- a revised assessment of the risks posed from contamination at the site to relevant receptors, including:
human health, ground waters, surface waters, ecological systems and property (both existing and proposed).

All site investigations must be undertaken by a competent person and conform with current guidance and best practice, including BS 10175:2011+A1:2013 and CLR11.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

22. No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission on a phase, shall take place on that phase until a detailed remediation method statement (RMS) has been submitted to, and approved in writing by, the LPA for that phase. The RMS must include, but is not limited to:
- details of all works to be undertaken including proposed methodologies, drawings and plans, materials, specifications and site management procedures;
 - an explanation, including justification, for the selection of the proposed remediation methodology(ies);
 - proposed remediation objectives and remediation criteria; and
 - proposals for validating the remediation and, where appropriate, for future maintenance and monitoring.

The RMS must be prepared by a competent person and conform to current guidance and best practice, including CLR11.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

23. Prior to any occupation or use of the approved development on a phase the RMS approved under condition 22 must be completed in its entirety for that phase. The LPA must be given two weeks written notification prior to the commencement of the remedial works.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

24. A validation report for a phase must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development on that phase. The validation report must include, but is not limited to:
- results of sampling and monitoring carried out to demonstrate that the site remediation criteria have been met;
 - evidence that any RMS approved in pursuance of conditions appended to this consent has been carried out competently, effectively and in its entirety; and
 - evidence that remediation has been effective and that, as a minimum, the site will not qualify as contaminated land as defined by Part 2A of the Environmental Protection Act 1990.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

25. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) on a phase shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall

be dealt with and obtained written approval from the Local Planning Authority for that phase. The remediation strategy shall be implemented as approved.

Reason: To ensure that risks from land contamination are minimised, in the event that unexpected contamination is found.

26. No development shall take place, including any works of demolition on a phase, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority for that phase. The Statement shall provide for:
- o the parking of vehicles of site operatives and visitors;
 - o loading and unloading of plant and materials;
 - o storage of plant and materials used in constructing the development;
 - o the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - o wheel washing facilities;
 - o measures to control the emission of dust and dirt during construction;
 - o a scheme for recycling/disposing of waste resulting from demolition and construction works; and
 - o delivery, demolition and construction working hours.

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

Reason: In the interest of local amenity and protection of the local environment during construction.

27. With the exception of any site clearance works, site investigation works and tree protection works no development in relation to each phase shall take place unless a Mineral Safeguarding Assessment and Minerals Management Plan for that phase has been submitted to and approved in writing by the local planning authority in consultation with the minerals planning authority. The Mineral Safeguarding Assessment shall assess the potential for the onsite reuse of mineral resource arising from groundwork, drainage and foundation excavations in accordance with an agreed methodology. The Minerals Management Plan will identify for each phase of development the type and quantum of material to be reused on site, and the type and quantum of material to be taken off site and to where. The development shall then be carried out in accordance with the Mineral Management Plan unless otherwise approved in writing by the local planning authority.

Reason: In accordance with the minerals safeguarding objectives of Local Plan Policy WLP6.1 and Paragraph 204 of the NPPF.

28. As part of each reserved matters application for landscaping, a plan indicating the positions, design, height, materials and type of boundary treatment to be erected shall be submitted to and agreed by the Local Planning Authority. The boundary treatment shall be completed in accordance with the approved scheme before the building to which it relates is occupied.

Reason: In the interests of amenity and the appearance of the development and locality.

29. As part of each reserved matters application for layout and landscaping, details shall be submitted to include:

(a) a plan showing the location of, and allocating a reference number to, each existing tree on, or adjacent to, the site which has a stem with a diameter, measured over the bark at a point 1.5 metres above ground level, exceeding 75 mm, showing which trees are to be retained and the crown spread of each retained tree;

(b) details of the species, diameter (measured in accordance with paragraph (a) above), and the approximate height, and an assessment of the general state of health and stability, details of each retained tree and of each tree which is on land adjacent to the site and to which paragraphs (c) and (d) below apply;

(c) details of any proposed topping or lopping of any retained tree, or of any tree on land adjacent to the site;

(d) details of any proposed alterations in existing ground levels, and of the position of any proposed excavation, [within the crown spread of any retained tree or of any tree on land adjacent to the site] [within a distance from any retained tree, or any tree on land adjacent to the site, equivalent to half the height of that tree];

(e) details of the specification and position of fencing [and of any other measures to be taken] for the protection of any retained tree from damage before or during the course of development.

In this condition "retained tree" means an existing tree which is to be retained in accordance with the plan referred to in paragraph (a) above.

The details provided shall be in accordance with the standards set out in 'BS5837:2012 - Trees in Relation to Design, Demolition and Construction' (or the relevant professional standards should the guidance be updated/modified/superseded).

Reason: to ensure that the detailed design retains important trees on the edges of the development site and incorporates existing and new planting into the development layout.

30. As part of each reserved matters application for appearance, details of all external facing and roofing materials for all buildings within that reserved matters area shall be submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure the satisfactory external appearance of the development.

31. As part of reserved matters applications for appearance, layout and scale, details shall be submitted to the Local Planning Authority for approval demonstrating how 40% of the proposed dwellings shall be designed to meet requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings. The development shall thereafter be carried out in accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: in accordance with the lifetime design objectives of policy WLP8.31 of the East Suffolk (Waveney) Local Plan.

32. As part of reserved matters applications for appearance, layout and scale, details shall be submitted to the Local Planning Authority through the submission of a sustainability statement which demonstrates that Sustainable Construction methods have been incorporated into the development proposal. The development shall thereafter be carried out in accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: in accordance with the sustainable construction objectives of policy WLP8.28 of the East Suffolk (Waveney) Local Plan.

33. As part of each layout reserved matters application, details of external lighting to be installed on the site, including the design and specification of the lighting unit, any supporting structure and the extent of the area to be illuminated and how the impact on ecology has been considered shall be submitted to and approved in writing by the Local Planning Authority. The external lighting shall be installed in accordance with the approved details and no additional lighting shall be installed in public areas without the prior approval of the Local Planning Authority.

Reason: To protect biodiversity and the visual amenity of the surrounding area.

34. The mitigation and enhancement measures outlined on pages 16 to 18 of the Ecology Assessment report (Hopkins Ecology, February 2019) shall be implemented in full unless otherwise approved in writing by the Local Planning Authority.

Reason: in accordance with the biodiversity and geodiversity objectives of policy WLP8.34 of the East Suffolk (Waveney) Local Plan 2019.

35. As part of each reserved matters application(s) for landscaping, layout, appearance and scale, the following ecological plans shall be submitted to the Local Planning Authority for approval:

- o a Construction Environment Management Plan (CEMP) detailing construction mitigation measures; and
- o an Ecology Management Plan (EMP) detailing operational mitigation, management and enhancement measures as part of the final detailed design.

Development shall be carried out in accordance with the approved details unless otherwise approved in writing.

Reason: to mitigate construction impacts and ensure long term biodiversity enhancements in accordance with the objectives of policy WLP8.34 of the East Suffolk (Waveney) Local Plan 2019.

36. No development shall take place in each layout reserved matters area until a scheme for the installation of fire hydrants throughout that part of the site has been submitted to and approved in writing by the Local Planning Authority in conjunction with the Fire and Rescue Service. The fire hydrants shall be installed prior to occupation of dwellings within each part of the development to which they relate, and the phasing of occupation and hydrant installation of that reserved matters area shall be set out in the submission.

Reason: In the interests of fire safety.

37. The dwellings (including any flats and apartments) hereby permitted shall not be occupied otherwise than by a person as their only or Principal Residence. For the avoidance of doubt, the dwelling shall not be occupied as a second home or holiday letting accommodation. The Occupant of each dwelling will supply to the Local Planning Authority (within 28 days of the Local Planning Authority's written request to do so) such information as the Authority may reasonably require in order to determine whether this condition is being complied with.

Reason: in accordance with the requirements of Reydon Neighbourhood Plan Policy RNP4.

11. Informatives:

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
2. East Suffolk Council is a Community Infrastructure Levy (CIL) Charging Authority.

The proposed development referred to in this planning permission may be chargeable development liable to pay Community Infrastructure Levy (CIL) under Part 11 of the Planning Act 2008 and the CIL Regulations 2010 (as amended).

If your development is for the erection of a new building, annex or extension or the change of use of a building over 100sqm in internal area or the creation of a new dwelling, holiday let of any size or convenience retail, your development may be liable to pay CIL and you must submit a CIL Form 2 (Assumption of Liability) and CIL Form 1 (CIL Questions) form as soon as possible to CIL@eastsuffolk.gov.uk

A CIL commencement Notice (CIL Form 6) must be submitted at least 24 hours prior to the commencement date. The consequences of not submitting CIL Forms can result in the loss of payment by instalments, surcharges and other CIL enforcement action.

CIL forms can be downloaded direct from the planning portal:

https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5

Guidance is viewable at: <https://www.gov.uk/guidance/community-infrastructure-levy>

3. Informative from Suffolk County Council Archaeological Service:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to East Suffolk Council, the Conservation Team of SCC Archaeological Service will, on

request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site, before approval of layout and drainage under reserved matters, and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation. We would strongly advise that evaluation is undertaken at the earliest opportunity.

Further details on our advisory services and charges can be found on our website:
<http://www.suffolk.gov.uk/archaeology/>

4. It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

Appendices

Appendix A: Planning Committee North Meeting Minutes (10 March 2020)

Appendix B: Report (DC/19/1141/OUT) for March 2020 Planning Committee North Meeting

Appendix C: March 2020 Planning Committee North Update Sheet

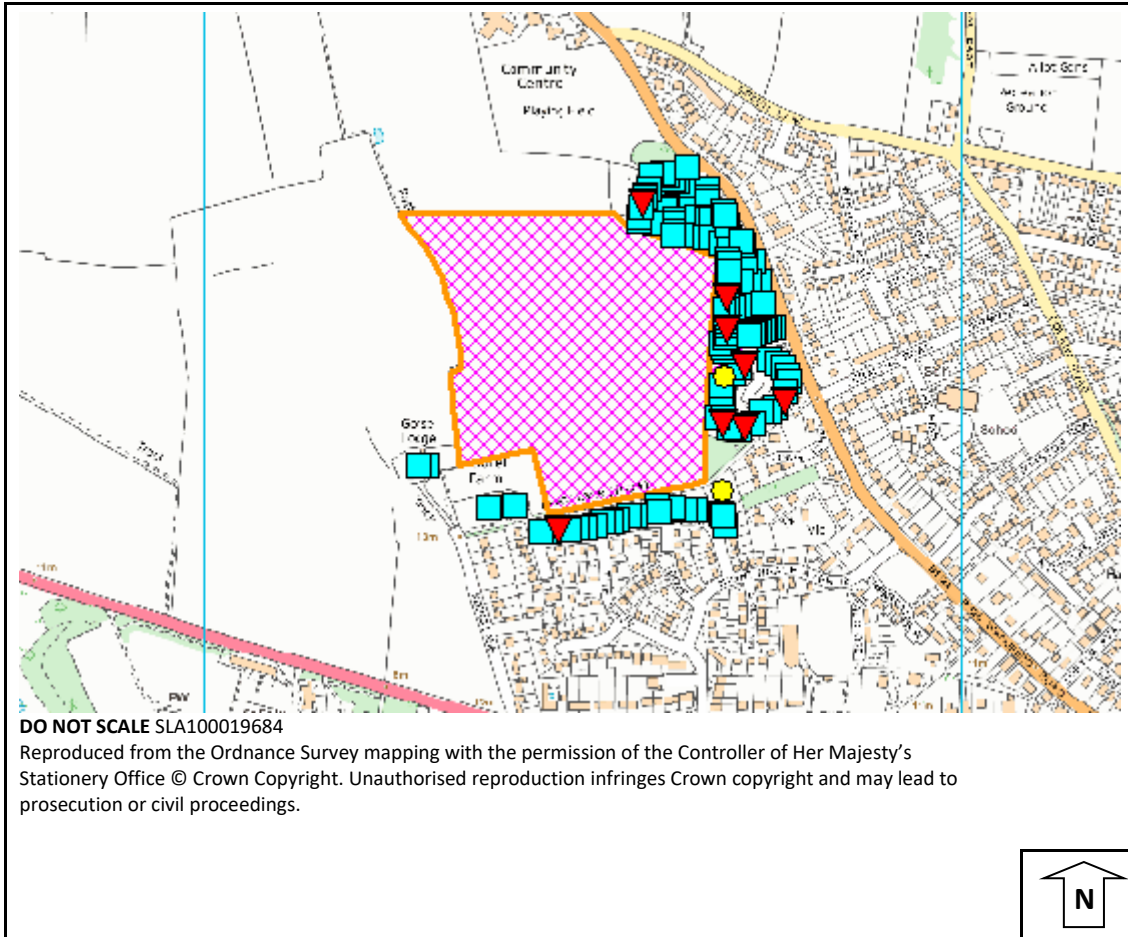
Background Papers

See application reference DC/19/1141/OUT at <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=POEXALQXIQE00>

Link to Local Plan Policy WLP6.1: [Local Plan - East Suffolk Council - Waveney Local Plan \(Adopted March 2019\) - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

Link to Reydon Neighbourhood Plan: [RNP-Made-Plan-April-2021-FINAL-v1.pdf \(eastsuffolk.gov.uk\)](#)

Map



Key



Notified, no comments received



Objection



Representation



Support