

Committee Report

Planning Committee North - 8 February 2021

Application no DC/21/2679/FUL **Location**

Land to the North of

Chapel Road Wrentham Beccles Suffolk

Expiry date 31 August 2021

Applicant Cripps Developments Ltd

Parish Wrentham

Proposal Development of 65 dwellings, both one and two storey, including

landscaped open space, recreation space and equipped play area for

public use, highways and other infrastructure

Case Officer Danielle Miller

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Full Application

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1. Summary

Application type

- 1.1. The application seeks full planning permission for the development of 65 dwellings, both one and two storey properties, including landscaped open space, recreation space which includes an equipped play area for public use, fully integrated SUDs and other associated infrastructure.
- 1.2. The application site is 4.82 hectares and located at the northwest periphery of Wrentham. The site has been continuously used for agriculture and can be accessed from Chapel Road. The site is located outside but close to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. It is located outside but close to Wrentham's Conservation Area and there are a number of listed buildings located in close proximity to the site.
- 1.3. This is an allocated site within the Waveney Local Plan policy WLP7.8 for the residential development of approximately 60 dwellings and open space.

- 1.4. The proposed development is supported by officers as a sustainable form of development in accordance with the Development Plan, along with the updated NPPF. The development is fully within the confines of allocation WLP7.8 and the development as proposed has met the criteria noted within that policy and other specific policies within the Local Plan.
- 1.5. The council have undertaken a Habitats Regulations Assessment (HRA Stage 2 Appropriate Assessment) and consulted Natural England (NE) who consider that the proposed development will not have significant adverse impacts on designated habitat sites, subject to appropriate mitigation being secured, and therefore raise no objections to the development proposal. Other statutory consultees have not objected to the application including SCC Highways Authority and the Local Lead Flood Authority (LLFA). The Parish Council have maintained their objection relating mainly to the highway implications of the proposed number of additional dwellings.

Reason for Committee

1.6 The application comes before the Planning Committee as the Parish Council have raised objections to the proposal, their full comments can be seen in the consultation section of this report and have been revised following revisions to the overall scheme, furthermore the application is a major housing development on an allocated site and thus warrants consideration by the Planning Committee. In accordance with the scheme of delegation, the Head of Planning and Coastal Management has requested that the decision is to be made by members at the respective planning committee, due to its scale, allocated status and the public interest in the proposal.

Recommendation

- 1.6. The application is recommended for AUTHORITY TO APPROVE subject to the signing of a section 106 legal agreement to secure necessary planning obligations; along with the required planning conditions summarised in the recommendation section of the report.
- 1.7. Alternatively, in the event of failure to complete the S106 within six months from the date of this Committee meeting, delegate AUTHORITY TO REFUSE the application.

2. Site description

- 2.1. The application site consists of 4.82 hectares and is located at the north west periphery of Wrentham. The site has been used continuously for agriculture and can be accessed from Chapel Road. Whilst the site is located outside the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, it is positioned within its setting. The site is close to but outside the Wrentham Conservation Area.
- 2.2. Wrentham village is located on the A12 between Lowestoft and Southwold and has historically expanded along the road network, creating a built up area characterised by development branching out from the village centre mainly to the west. These consist of Chatten Close which borders the site to the east, a turn of the century estate with a mix of two storey properties. The Chestnuts, beyond Chatten Close, to the east is predominately bungalows with a few houses built in the 70s. On the opposite site of the road, to the south of the application site, Bonsey Gardens a linear post war estate with dwellings on either side of the road and further east of that is Oak Hill Close.

- 2.3. The Wren River stretches through the village north to south. The application site lies to the south of the river. The site is located within the lowest risk area flood zone 1. To the north of the site, close to the river, Flood zone 3 is on the periphery of the northern site boundary.
- 2.4. A surface water infiltration basin sits in the north-west corner, which is associated with the existing development at Chatten Close.
- 2.5. The site is outside but closely related to the Conservation Area that stretches along Priory Road to the north of the site and along the High Street to the east of the site. Several heritage assets are located along Priory Road to the north including Priory Farm, The Priory and several locally listed buildings. These have prominent rear frontages and views from the north across the site. Paddocks located immediately east of the site contribute towards the setting of existing residential properties and create a sense of openness in the area. The landscape to the west has a more open character.
- 2.6. The edges of the site are currently used as informal pedestrian footways. Public Right of Way (PrOW) (Route No.6) is located on the opposite site of Chapel Road running along the western edge of Bonsey Road estate and connects into route No.15 and subsequently No.8. Route No.4 is located to the north on the opposite side of Priory Road; however, this is on the opposite side of the River Wren and relies on access to it via a road route.
- 2.7. Public transport exists within the village and connects Wrentham to larger service centres of Lowestoft, Kessingland and Southwold. School transport is currently provided from the village to Reydon Primary School and to secondary schools in the area.
- 2.8. This is an allocated site within the Waveney Local Plan under policy WLP7.8 for the residential development of approximately 60 dwellings and open space.

3. Proposal

- 3.1. The proposals seeks full planning permission for the development of 65 dwellings and associated garaging; including landscaped open space with fully integrated SUDs; recreation space and equipped play area for public use; highways; and other infrastructure.
- 3.2. The development will include a range of single storey and two storey dwellings in a mix of forms including detached, semi-detached and terraced properties. The size of the properties range from 1-4 bedrooms with a 30% provision of affordable housing equating to 20 affordable houses provided on site.
- 3.3. The materials proposed include a mix of red, multi and buff brick with a mix of pantile and plain tile roofing.
- 3.4. All properties will have off street parking and the majority of properties have an attached or detached garage. Visitor parking has been included within the provisions where local car parking standards have been met.
- 3.5. Access is proposed onto Chapel Road with footpath connection to the existing PROW network (route No.6) on the opposite side of Chapel Road. A walking route has been created around the perimeter of the site which adjoins the above mentioned footpath. A cycle route is also provided which connects into the road network within the site and the existing road network outside the site.

- 3.6. Sustainable Urban Drainage Systems (SUDs) has been incorporated into the landscaping scheme with an infiltration basin located to the north west, and swales running through the central corridor of the site and along the northern open space. The existing basin serving Chatten Close will be retained.
- 3.7. Open space is proposed to the south west of the site, which includes an equipped Local Area for Play (LAP) and connections to accessible landscaped walking routes along the west and north edges.

4. Consultations/comments

- 4.1. Seven representations have been received, six objecting to the proposal and one making comments; the comments have been summarised below:
 - Overdevelopment.
 - Road not suitable for this scale of additional development. In particular children crossing
 the road to use the new play area and safety of youngsters getting on and off the school
 bus.
 - Parking is already a problem in Chapel Road, this will become worse.
 - Traffic is too fast coming into the village.
 - Loss of local footpaths.
 - Impact on biodiversity.
 - Loss of view.
 - Localised flooding currently an issue, concern that this will be worse.
 - The existing Balancing Basin is going to be affected by surface water entering it which is going to over flow out into the unmaintained ditch and then into the river Wren.
 - Concern on overlooking.
 - Concern about maintenance of swales.
 - Access into the site not safe as visibility poor through Chapel Road.
 - Fails to promote social interaction.
 - Not enough sustainability considerations, and not including adaptions to climate change.
 - Negative impact on Chatten Close.
 - Lack of school to facilitate this scale residential development.
 - Negative impact on existing facilities.
 - Failure to protect the setting of a heritage asset (The Priory, a Grade II).

- Inaccurate flood risk assessment.
- Concern about drainage from the holding basin onto Eagle Court.

Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Wrentham Parish Council	22 June 2021	22 July 2021

Summary of comments:

"We have had positive and constructive engagement with Residents and Developer since this land was purchased for development. There have been 3 public meetings, 2 via Zoom and one face to face. Throughout this process a Log has been running to capture issues & highlight areas of concern - attached is an updated version of the log as the one used by the Developers within the Planning Application is now out of date - for your convenience we have highlighted the areas of concern in red. Councillors discussed the application at our meeting on Monday 19th July 2021 and voted to OBJECT to the application on the following grounds - Flooding - the attenuation pond appears to be higher than flood areas and properties. Will the system cope with additional surface water run off?

Impact on privacy of existing residents of Priory Road/Chatten Close - will mature trees be used for screening? Are 2 storey dwellings suitable in this location?

Access/Traffic - Speeding on Chapel Road. As there is street lighting should the entire length be 30mph? An additional 65 houses and associated vehicles will change the area. Could signage be improved to raise awareness of 30mph limit and proximity of children's play area.

Access/Traffic - Creation of layby on Chapel Road for school bus & additional parking for parents dropping off/collecting children.

Parking - there is a shortage of parking in the area & Wrentham in general. Residents and those visiting local businesses already struggle to park. Will there be adequate on the new development?

Access/Traffic - Concern that increased traffic in Chapel Road will lead to Priory Road being used as a 'rat run' which will impact on the safety of residents and pets. Particular concern re HGVs using Chapel Road and Priory Road to access A12 when they should use Guildhall Lane to do so.

Affordable Housing - ESC guidance is 30% - preference to be given to local people.

Suggestion to Developers re naming of new roads."

Statutory consultees

Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	2 November 2021	24 June 2021

Summary of comments:

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

Water Supplies

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Sprinklers Advised

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system.

Consultee	Date consulted	Date reply received
Natural England	2 November 2021	23 November 2021

Summary of comments:

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES As submitted, the application could have potential significant effects on:

o Benacre to Easton Bavents Special Protection Area (SPA)

o Benacre to East Bavents Lagoons Special Area of Conservation (SAC)

- o Minsmere to Walberswick SPA
- o Minsmere to Walberswick Ramsar
- o Minsmere to Walberswick Heaths and Marshes SAC

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

A Habitats Regulation Assessment (HRA) is required to determine the impacts of increased recreational disturbance on the above sites. As noted in the submitted Environmental Impact Assessment, the development falls within the 'Zone of Influence' for the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'), we advise a financial contribution of £321.22 per dwelling.

Additionally, we advise that as the development results in an increase of over 50 dwellings, onsite mitigation should be secured. Natural England recognises that the development includes plans for public open access green space, however, we would advise that enhancements are made as outlined in the guidance below.

Natural England agrees with the conclusion from the submitted Environmental Impact Assessment that there will be no adverse impacts on Pakefield to Easton Bavents SSSI due to its distance and location.

Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained. Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	22 June 2021	25 June 2021

Summary of comments:

No objection requested general conditions on Construction Management Plan recommended condition on Discovery of Unexpected Contamination.

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	22 June 2021	7 July 2021

Summary of comments:

This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER). The site has been subject to pre-application archaeological evaluation (HER ref no.

WRE 079), which has identified two areas where archaeological features are present and require an archaeological excavation to be undertaken prior to the commencement of the development on this site. The archaeological features present on this site date from the Early Neolithic, Neolithic - Early Bronze Age, Roman, Early Saxon and high-late medieval periods. As a result, there is high potential for the discovery of additional below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

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 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	22 June 2021	2 July 2021

Summary of comments:

A holding objection is necessary because the drainage strategy is based wholly upon the use of infiltration, however the testing returned variable rates across that site with extrapolated results,

failures in some locations and incidences of shallow groundwater. The inclusion of an open storage feature is welcomed however further open features incorporated into the layout are preferable to manage surface water runoff across the site, at source where possible. These can include rain gardens, tree pits, green roofs, permeable paving, bioretention areas and swales.

The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.

Officer Note: Re-consultation response received 16th November 2021 removing holding objection please see below for full details.

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	22 June 2021	19 July 2021

Below are Suffolk County Councils developer contribution requests for development at the above site for :65 dwellings, both one and two storey, including landscaped open space, recreation space and equipped play area for public use, highways and other infrastructure. 4 No. 1 Bed, 16 No. 2 Bed, 32 No.3 Bed, 13 No.4 Bed + houses.

The site is allocated in the Waveney Local Plan Policy WLP7.8.

CIL	Education	
	Primary expansion	£259,020
	Secondary expansion	£261,525
	Sixth form expansion	£47,550
CIL	Early Years	£103,608
CIL	Libraries improvements & stock	£14,040
CIL	Waste infrastructure	£3,640
	TOTAL CIL	£689,383
S106	Primary school transport costs	£126,525
S106	Secondary school transport costs	£66,275
S106	Highways	tbc
	TOTAL S106	£192,800
	-	
S106	Monitoring fee per trigger	£412

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	22 June 2021	24 June 2021
Summary of comments: No Objection.		

Non statutory consultees

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	2 November 2021	12 August 2021

Summary of comments:

Officer cycling and walking infrastructure recommendations:

1 - Introduce a cycling and walking track along the western and southern site boundaries. The track along the southern site boundary should be segregated from Chapel Road by the existing hedgerow. The track should have priority over the vehicle access road. The track should link into

Footpath 6 to the south, which should be upgraded to bridleway to enable cycle access.

- 2 Introduce a cycling and walking crossing point on Chapel Road.
- 3 Introduce a pinch point on Chapel Road, where Footpath 6 meets Chapel Road. The pinch point should be on the eastbound carriageway, thereby primarily slowing traffic entering the village from a national speed limit. The pinch point will also make crossing Chapel Road from WLP7.8 into Footpath 6 much safer and more comfortable.
- 4 Explore opportunities to introduce a cycling and walking track between the north west corner of the site and Footpath 4. Upgrade Footpath 4 to a bridleway to enable cycle access. As

the site boundary does not reach Priory Road and as a stream appears to run west to east just north of the site, a pedestrian and cycle crossing point of the stream may be required.

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	22 June 2021	No response

Summary of comments:

Internal comments included under consideration section.

Consultee	Date consulted	Date reply received
Suffolk Police Designing Out Crime Officer	22 June 2021	6 July 2021

Summary of comments:

Suffolk Police acknowledge that in general the layout with one way in is good and there is some good surveillance from the dwellings to public open space areas as well as looking onto other dwellings. There is also good surveillance to the visitor parking spaces.

Comments on layout made details of which have been included within the body of the report.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	22 June 2021	No response
Summary of comments:	1	

Comments included within Officer report.

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	22 June 2021	9 July 2021

Summary of comments:

Comments included within Planning Consideration section of report.

Reconsultation consultees

Consultee	Date consulted	Date reply received
Wrentham Parish Council	2 November 2021	24 November 2021

Summary of comments:

We have had positive and constructive engagement with Residents and Developer since this land was purchased for development. There have been 4 public meetings, 2 via Zoom and 2 face to face. Throughout this process a Log has been running to capture issues & highlight areas of concern. Councillors discussed the revised plans at our meeting on Monday 22nd November 2021 and noted a great deal of work has been done which mitigates some of the concerns raised in July 2021 & we thank the Developers for this. Following discussion Councillors voted to OBJECT to the application on the following grounds —

Access/Traffic - Speeding on Chapel Road. As there is street lighting should the entire length be 30mph? An additional 65 houses and associated vehicles will change the area. Could signage be improved to raise awareness of 30mph limit and proximity of children's play area.

Access/Traffic - Creation of layby on Chapel Road for school bus & additional parking for parents dropping off/collecting children.

The PC are concerned that traffic hits the 30mph limit on a blind bend (with the nearside sign obscured due to a narrow verge) immediately prior to the entrance to the new development and children's play area. To prevent this becoming an accident hotspot the PC would like to see the speed limit reduced to 40mph between Church Corner & the existing 30mph area. There also needs to be signage to highlight the proximity of the new play area.

This remains an area of concern. The PC would like to see further work to prevent exacerbation of existing issues in the area. The development will lead to more children using the school bus. There are already issues caused when the bus has no room to pull over and these will be worse with a new junction directly opposite the bus stop. The drop kerbed for pedestrians to cross Chapel Road to the new development is on a blind bend where speeding is already an issue. The Developers are willing to fund & build a layby(s) however permission is needed from Highways, we understand this has been refused when the Developers spoke with Highways, but believe that County Councillor Dunning is now raising this issue again.

Parking - there is a shortage of parking in the area & Wrentham in general. Residents and those visiting local businesses already struggle to park. Will there be adequate on the new development?	Chapel Road is narrow with many obstacles including kerbside parking opposite the entrance to the new development and, in addition, on the grass verges as you enter Bonsey Gardens. There is simply not enough residential parking, The development of 65 houses will bring increased traffic movement directly opposite Bonsey Gardens exacerbating the issue. The Parish Council asks that the provision of additional residential parking is looked at further to mitigate this. We understand the Developers are adding 2 additional parking spaces within the site. The Developers are happy to fund & build 2 additional bays in Bonsey Gardens but permission is needed from Suffolk County Council who own the land.
Affordable Housing - ESC guidance is 30% - preference to be given to local people	The Parish Council would like to see conditions in the Planning & in the S106 Agreement which make a provision to ensure that priority be given to those with a local connection. We understand conversations have been held between the Developer & The Housing Officer & the PC will contact the Housing Officer to ask that preference be given to those with a local connection.

Consultee	Date consulted	Date reply received
SCC Highways Department	2 November 2021	29 November 2021

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below once the LLFA holding objection has been lifted and adequately resolved as the drainage of the site is relevant to the highway network. Conditions have been recommended.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	2 November 2021	16 November 2021

Summary of comments:

Initially a holding objection was considered necessary because the proposed drainage network does not fully take into account advice previously issued by the LLFA (via email, dated 30th September 2021) or addresses all the points in the LLFA's previous holding objection, dated 2nd July 2021, and therefore does not currently comply with local or national guidance and policy. The LLFA's requests are consistent with standards other applications are held to throughout East Suffolk and take into account policy contained within the Waveney Local Plan, specifically WLP8.139, WLP8.140 & WLP8.24, the Suffolk Flood Risk Management Guidance and the Suffolk SuDS Guide. Further, the Environment Agency's reservoir flood mapping has been updated which needs reflecting in the submitted FRA.

Following revisions made, the holding objection has been removed and strategy agreed; full details are noted within the Officer Report; conditions are recommended.

Consultee	Date consulted	Date reply received
Natural England	2 November 2021	10 th December 2021

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would have an adverse effect on the integrity of the following designated sites:

- Benacre to Easton Bavents Special Protection Area (SPA)
- Minsmere to Walberswick SPA
- Minsmere to Walberswick Special Area of Conservation (SAC)
- Minsmere to Walberswick Ramsar

We consider that without appropriate mitigation the application would also damage or destroy the interest features for which the underpinning Sites of Special Scientific Interest (SSSIs) of the above European sites have been notified.

In order to mitigate these adverse effects and make the development acceptable, we agree that the mitigation measures summarised on page 3 of your Habitats Regulations Assessment (HRA) must be secured.

We advise that an appropriate planning condition

Consultee	Date consulted	Date reply received
East Suffolk CIL	2 November 2021	No response
Summary of comments:		

Internal comments included within report under considerations section.

Consultee	Date consulted	Date reply received
Disability Forum	2 November 2021	No response
Summary of comments:	1	

No Comments received.

Consultee	Date consulted	Date reply received
Essex And Suffolk Water PLC	2 November 2021	No response
Summary of comments:		
No comments received.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	2 November 2021	24 November 2021

Internal comments included within body of report under Considerations.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	2 November 2021	8 November 2021
Summary of comments:		

Summary of comments:

No objections standard conditions recommended.

Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	2 November 2021	No response
Communication of accommendation	1	

Summary of comments:

No additional comments received.

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	2 November 2021	No response

Internal comments included within considerations section of this report.

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	2 November 2021	No response
Summary of comments:		
No comments received.		

Consultee	Date consulted	Date reply received
Police - Design Out Crime Officer	2 November 2021	22 November 2021

• Layout of Roads and footpaths:

See Section 8 of SBDH 2019 which encourages defensible space to ensure that the physical environment enables the resident to control the areas around their own home. Research shows that the benefit of cul-de-sacs can be compromised if they are backing onto open land, or are very long (deep) or linked to one another by footpaths and poor lit. It is important to ensure that permeability is limited as this could provide the opportunity for crime to occur.

• Dwelling Layout and Orientation and Boundaries:

See SBD H 2019 Section 10 and 11 and 13. Section 12 also gives guidance around gable end walls that do not provide further surveillance with windows in active rooms and can lend themselves to the opportunity for graffiti, loitering or ball games. It is important to ensure that gable end windows are designed in active rooms to provide further natural surveillance to vulnerable areas or vehicle parking places between dwellings where garages are not provided.

• Vehicle Parking:

See SBDH 2019 Section 16: Vehicles should be either parked in locked garages or on a hard standing within the dwelling boundary.

• Landscaping:

See SBDH 2019 Section 17: Sustainable provisions should be made for the maintenance and

management of Communal Open Space areas/grass verges/surface water drainage area. The correct use of certain species of plants can impact on the potential for crime and assist with preventing some types of crime. Planting should not impede the opportunity for natural surveillance or blocking of street lighting.

• Street Lighting: See SBDH 2019 Section 18: Lighting should conform to BS 5489-1:2016.

Whilst we are sensitive to the need for dark skies we would also point out that poorly lit areas can enable the opportunity for criminal activity.

• Security Specifications: It is recommended that residential dwellings doors and windows are

built to Section 21 and 22 (Secured by Design – police approved specification SBD PAS 24:2016). External dwelling lighting should conform to Section 25 of SBDH 2019. All dwellings to be fitted with dusk to dawn sensor lighting to front and back doors.

- Communal areas and Play Space: Should conform to SBD Homes 2019 Section 9.
- Cycle storage and external storage: Cycle Storage within dwellings should comply with Section 56 of SBDH 2019.

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	2 November 2021	No response
Summary of comments:		

 $Internal\ comments\ included\ within\ Officer\ report.$

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	2 November 2021	2 November 2021
Summary of comments: No additional comments received.		

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	16 November 2021	16 November 2021

Summary of comments:

I refer to the proposal: development of 65 dwellings, both one and two storey, including landscaped

open space, recreation space and equipped play area for public use, highways, and other infrastructure.

Reason(s) for re-consultation: amended plans.

A consultation response was submitted to the LPA by way of letter dated 19 July 2021, which is still relevant. I have no further comments to make in respect of the re-consultation.

I have copied to county council colleagues who deal with highways, flood planning, and archaeological matters.

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	2 November 2021	3 November 2021

Summary of comments:

Thank you for SCC Archaeological Service for planning application DC/21/2679/FUL. We have reviewed the submitted plans and our previous recommendation for conditions for archaeological excavation and reporting given 7th July 2021 is still advised for this development site. Preapplication archaeological investigation works undertaken on the site have identified two areas of archaeology which will require archaeological excavation prior to the commencement of development on this site.

Consultee	Date consulted	Date reply received
SCC Rights Of Way	2 November 2021	No response
Summary of comments:		

Summary of comments:

No additional comments received.

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	2 November 2021	30 November 2021
		'

Summary of comments:

Previous comments from 9 July 2021 apply.

Consultee	Date consulted	Date reply received
NHS England Midlands And East	2 November 2021	No response
Summary of comments:		
No comments received.		

Consultee	Date consulted	Date reply received
Historic England	2 November 2021	18 November 2021

Thank you for your letter of 2 November 2021 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	2 November 2021	No response
Summary of comments:		
Comments included within officer report.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	2 November 2021	No response
Summary of comments:		

Comments included within officer report.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	2 November 2021	No response
Summary of comments:		
No additional comments made.		

Consultee	Date consulted	Date reply received
East Suffolk CIL	22 June 2021	No response
Summary of comments:		
Internal comments included within officer report.		

Publicity

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

Category	Published	Expiry	Publication
Major Application	25 June 2021	16 July 2021	Beccles and Bungay Journal
Category	Published	Expiry	Publication

5. Site notices

5.1. General Site Notice Reason for site notice: Major Application; Affects Setting of

Listed Building

Date posted: 1 July 2021

Expiry date: 22 July 2021

6. Planning policy

- 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)
- WLP7.8 Land North of Chapel Road, Wrentham (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)
- WLP8.21 Sustainable Transport (East Suffolk Council Waveney Local Plan, Adopted March 2019)
- WLP8.24 Flood Risk (East Suffolk Council Waveney Local Plan, Adopted March 2019)
- WLP8.27 Renewable and Low Carbon Energy (East Suffolk Council Waveney Local Plan, Adopted March 2019)
- WLP8.28 Sustainable Construction (East Suffolk Council Waveney Local Plan, Adopted March 2019)
- o 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)
- WLP8.39 Conservation Areas (East Suffolk Council Waveney Local Plan, Adopted March 2019)
- WLP8.40 Archaeology (East Suffolk Council Waveney Local Plan, Adopted March 2019)
- National Planning Policy Framework 2021 (NPPF)
- The Historic Environment Supplementary Planning Document (SPD) adopted June
 2021

- Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD) adopted May 2021
- Waveney District Landscape Character Assessment April 2008
- National Design Guide January 2021
- Building for a Healthy Life June 2020

7. Planning considerations

- 7.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) sets out that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise." This is reflected in paragraph 12 of the NPPF which affirms the statutory status of the development plan as the starting point for decision-making.
- 7.2. The development plan comprises the East Suffolk Council Waveney Local Plan ("The Local Plan") and any adopted Neighbourhood Plans, for which Wrentham does not currently have. The relevant policies of the Local Plan are listed in the section above and will be considered in the assessment to follow. It is important to also note that NPPF paragraph 11 requires that planning decisions apply a presumption in favour of sustainable development and that means, for decision-taking, approving development proposals that accord with an up-to-date development plan without delay.

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, rural areas, for which Wrentham is considered, are expected to deliver approximately 10% of housing growth in the Waveney Local Plan area. The main policy to deliver that housing growth is WLP7.1 (Rural Settlement Hierarchy and Housing Growth) which states that 70% of new housing development in these areas will be in larger villages where Wrentham is considered to be a larger village under the local plan.
- 7.4. The strategy for Wrentham is to allow for a reasonable level of growth to help support the shops and services in the village. A mix of housing types and tenures will provide choice in the market and enable new housing to meet the needs of the community.
- 7.5. The land north of Chapel Road, Wrentham (4.82 hectares) as put forward in this application is allocated for a residential development of approximately 60 dwellings and open space under policy WLP7.8 (Land North of Chapel Road, Wrentham).
- 7.6. The principle of residential development on the site is therefore planned for and entirely supported by the Local Plan. This allocation forms part of the delivery of the strategy of the Local Plan as set out in policies WLP1.1 and WLP1.2 as noted above, which aims to ensure the vision for the Local Plan is delivered alongside the requirements of the National Planning Policy Framework.

- 7.7. Policy WLP7.8 sets down certain criteria for the development of the site which are considered as follows:
 - The residential part of the site will be developed at a density of approximately 30 dwellings per hectare.
 - Any proposal should be designed to provide a mix of housing types and sizes including single and two storey dwellings.
 - Dwellings in the north part of the site and along the west boundary should be no higher than 1.5 storeys.
 - Any planning application should be supported by a Landscape and Visual Impact
 Assessment that identifies the impact on the wider landscape and the Area of
 Outstanding Natural Beauty and conservation area, and any necessary mitigation
 works.
 - Low density development is to be supported with a landscaping scheme to provide openness on site and provide screening along the north and west boundaries of the site.
 - This landscaping scheme should be informed by the Waveney District Landscape
 - Character Assessment (2008), Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study (2016) and the completed Landscape and Visual Impact Assessment.
 - An equipped play area equivalent to a neighbourhood equipped area for play and ancillary open space for amenity use will be provided of a size not less than 0.5 hectares. The ancillary open space should have landscaping that lends itself to natural and informal forms of play.
 - The public open space is to be located at the south side of the site and designed to have street frontages on three sides ideally being on a corner plot.
 - Existing informal pedestrian footways should be protected and incorporated into development where possible.
 - Hedgerows and trees located along the site boundaries should be protected and reinforced where possible.
 - A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application.
 - A footway along the frontage of the site with Chapel Road should be provided.
 - A Transport Statement should be submitted with any planning application.
 - Any planning application should include the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

- 7.8. The finer points of the proposal will be discussed in detail under the relevant consideration sections below.
- 7.9. The site area is 4.82ha with a built-up area, excluding landscaping area and amenity space, being 2.95ha. This provides a density of 22 dwelling per hectare which is lower than the policy requirements and considered suitable for this edge of village location where a lower density scheme accords with the neighbouring developments.
- 7.10. The proposals includes a mix of single storey and two storey dwellings where the properties along the southern boundary have been designed as single storey dwellings, and those on the west are a mix of single and two storey properties.
- 7.11. The required documents have been submitted in support of the application. These include but are not limited to the following which were specific requirements of the allocation policy set out above: a visual landscape appraisal; a detailed landscape scheme which shows screening along the north and west boundaries of the site; an ecological impact assessment (which has been undertaken and fully considered by the council's ecologist and Natural England); a Transport Statement; and an Arboricultural Impact Assessment Method Statement and Evaluation have also been included. These documents will be addressed throughout the report under the relevant material considerations below. These reports are considered by relevant consultees to meet the policy requirements.
- 7.12. The policy includes specific landscape considerations which include public open space being located at the southern side of the site; an equipped play area which is well overlooked; a footway along the frontage of the site; and the incorporation of the existing informal footways into the walking route around the site. Furthermore, the retention of existing hedgerows and trees along the boundaries of the site. These elements have been included in this detailed application and will be discussed in full under the relevant considerations below.
- 7.13. The principle of development is established through the Local Plan site allocation where material considerations will be discussed below.

Affordable Housing and Mix

- 7.14. The National Planning Policy Framework requires local planning authorities to identify the size, type and range of housing required, where the strategic Housing Market Assessment (2017) found that there was a need for smaller units across the district which included 1 and 2 bedroom properties. Policy WLP8.1 sets out the Council's approach to securing a mix of dwellings on development sites and requires at least 35% of dwellings to be 1 or 2 bed dwellings unless it can be demonstrated unfeasible.
- 7.15. A schedule has been provided on drawing number 0501.P12 which notes 4 one bedroom dwelling; 12 two bedroom dwellings; 31 three bedroom dwellings; and 18 four bedroom dwellings. This amounts to 25% of dwellings being 1 or 2 bed dwellings. Officers consider that whilst the mix of sizes and types of properties does not meet this policy requirement there is an overall mix of sizes and types of units on the site given the policy restrictions in number of single storey properties required and the low density dictated by the requirements of the site. 26% of the housing mix is 1 and 1.5 storey properties. Whilst in terms of bedroom size the percentage of 2 bed properties is lower than the council would

- ideally request. At 25% there is still an adequate mix. The remaining are predominately 3 bed properties with 27% 4 bedrooms. There are no 5 bedroom dwellings proposed.
- 7.16. Policy WLP8.2 "Affordable Housing" states that all new housing developments on sites with a capacity of 11 dwellings or more must make provision for a proportion of the total dwellings to be affordable housing as follows:
 - Housing developments in the Lowestoft and Kessingland area (excluding Corton) must provide 20% affordable housing;
 - Housing developments in the Southwold and Reydon area must provide 40% affordable housing; and
 - Housing developments in the remainder of the District must provide 30% affordable housing.
- 7.17. The policy discusses the types of tenure to be delivered on site where 50% should be affordable rent. The Government introduced a new scheme in June 2021 where all housing developments permitted after November 2021 must include a new tenure, First Homes, as part of their affordable housing mix. This does not reduce the amount of affordable rent required, however this is the governments preferred discounted market tenure and must account for at least 25% of all affordable housing units delivered by developers through planning obligations.
- 7.18. The proposal is for 65 dwellings of which 30% equates to 19.5 dwellings. The proposed affordable provision is therefore 20 dwellings on site in a mix of:
 - Affordable Rent (AR) Bungalows 1 bed Plots 18, 19, 35 & 36
 - AR Bungalows 2 bed Plots 37 & 38
 - AR Houses 2 bed Plots 16 & 17
 - AR Houses 3 bed Plots 20 & 21
 - Shared Ownership (SO) Houses 2 bed Plots 22, 29 & 30
 - SO Houses 3 bed Plots 3 & 4
 - First Homes Houses 2 bed Plots 25, 31 & 32
 - First Homes Houses 3 bed Plots 5 & 6
- 7.19. The affordable housing schedule above has been agreed by the councils housing officer. Where first homes have been included within the mix as per government requirements. The affordable housing provision will be secured within the S106 agreement and would thus accord with WLP8.2. As the scheme delivers half an affordable dwelling beyond the policy requirement 0f 19.5 (usually the 0.5 is covered with a commuted sum) the benefit of a whole extra dwelling is recognised on top of the significant benefit of affordable housing.

Design of Development

- 7.20. Allocation policy WLP7.8 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 WLP8.29 "Design" states that development proposals will be expected to demonstrate high quality design which reflects local distinctiveness. In so doing proposals should demonstrate a clear understanding of the form and character of the built and natural environment and use this understanding to complement local character and distinctiveness. Developments should respond to local context and the form of surrounding buildings in relation to:
 - the overall scale and character
 - layout
 - site coverage
 - height and massing of existing buildings
 - the relationship between buildings and spaces and the wider street scene or townscape
 - and by making use of materials and detailing appropriate to the local vernacular.
- 7.21. Within developments where affordable housing is provided Policy WLP8.2 highlights the importance of the affordable housing provision being indistinguishable from market housing in terms of the location, external appearance, design, standards and build quality and should meet all the same requirements of the design policies.
- 7.22. The layout broadly concentrates development in the middle area of the allocated site with a large buffer to the downslope along the northern boundary and a smaller one to the southern boundary. This is appropriate in principle, as it respects the site's topography, water drainage constraints, position of heritage assets, and the position of existing built form, Chatten Close.
- 7.23. With respect to the layout, one of the key drivers for its organisation is the position of the access off Chapel Road that forms the southern edge to the application site. The size of development is small enough for a single access to be entirely appropriate, and its position in the site corner is dictated by the position of the existing access opposite the site into Bonsey Gardens. The access being located towards off centre means that the policy requirement for the open space can be adequately located on the southern side of the site, avoiding this space being subdivide. This arrangement is considered to work well within the policy constants.
- 7.24. The layout incorporates back-to-back arrangements, where the dwellings on the cranked south-eastern boundary back onto the existing dwellings within Chatten Close. The existing tree line along this boundary has been retained. The layout has responded well in this manner to the character of the surrounding area.
- 7.25. The main route follows a linear cranked form on the eastern/south eastern boundary, which allows for a free hand secondary road system. There is a central circus where the streets intersect, which provides a central focus point for the development. The overall character, whilst formal, reflects that of Bonsey Gardens opposite and relates well to Chatten Close.

- 7.26. The development form is influenced by the site's topography, in terms of the location of the infiltration basin and overall shape of site. The site is divided into three perimeter blocks, where a fourth is made up by the south eastern row of properties and those located on the north west side of Chatten Close. This overall form provides an outward facing development which is appropriate for the location of the site. Whilst it does lead to an increase in access road area, as shared surfaces or private drives must be provided to all frontages of each block. The alternative is the use of rear parking courts which are not feasible here, given the small size of the development parcel.
- 7.27. The perimeter block form has the advantage of allowing development to address many key elements such as the countryside edges, internal roads and the two areas of public open space, which have been positively designed as landscape amenity features and play space, and incorporated into the layout. This overall approach is conventional and responds well to the surrounding area.
- 7.28. The perimeter blocks have been designed with a variety of form in that the scale of the properties change with the inclusion of single storey properties. This works well and helps avoid uniformity across the site which would have otherwise been out of character with the village and rural setting.
- 7.29. The streetscenes illustrate a strategy of single storey dwellings positioned along the northern and part of the western elevations, with two-storey dwellings positioned further into the site. The massing is considered to comply with policy wording, which is intended to reduce the effect of that to the development edges that face outwards into the open countryside or towards existing development along Priory Road. This strategy is also carried over into the setback frontage to Chapel Road, which has a mix of single and two-storey dwellings, reflecting the transition from the countryside into the village.
- 7.30. The use of focus buildings has been incorporated throughout the site, with those dwellings on key corners having dual frontages to ensure a legibility throughout the site. The central circus provides a welcome relief from the built form on approach into the site and softens the layout.
- 7.31. There are no existing rights of way within the site, however the site has been used as an informal walking route. PROW No.6 is opposite the site starting in the north western corner of Bonsey Gardens. The site is, otherwise, self-contained in respect of these kinds of connections but is well positioned for connectivity to the village centre and the services contained there. This is partly why it has been allocated as a development site.
- 7.32. The layout shows good internal connectivity through the site and between key areas of it, such as the development parcels, the play area, and public open spaces. The site perimeter is partly included in these connections. The site is small enough to enable easy foot connections across that do not involve extensive distances; and that the routes include alternatives to each other, either through the built development or its green margin setback (to the western edge). The perimeter footpath is shown to connect out of the site to the opposite side of the road where an existing footpath can be picked up and adjoin the PRoW system.
- 7.33. The eastern/south-eastern edge has taken into account existing adjacent development; the northern edge takes account of the need for swale and infiltration basin provision and green

- buffering; the western edge responds to the countryside with an outward facing built frontage; and the southern edge makes provision for open and play space.
- 7.34. The submission includes streets scenes and 3D visualisations along with a full suite of house types. The overall character is quiet and provides a traditional pastiche. The materials include a mix of different brick types, including red and buff colours with a mix of pantile and plain tile roofing. This is considered acceptable in the context of the village. The hard surfacing materials are acceptable. The boundary treatment has been considered to include both close boarded fencing and brick walls where these boundaries make up part of the streetscene. A materials schedule has been included on drawing 0504P7.
- 7.35. Overall, the layout and character of the development accords with the principles set out in WLP8.29 where it demonstrates a clear understanding of the form and character of the built, historic and natural environments and responds well to local context. Where the density and design have been considered to make the best use of the site in a manner that protects the character of the area in accordance with Policy WLP8.32. The scheme meets the high-quality design and layout aspirations of the site allocation policy.
- 7.36. As part of the council's vision to create a healthy population, dementia friendly design principles should be incorporated in all types of development where appropriate, but particularly housing developments. Policy WLP8.31 requires that all new housing developments on sites of 10 or more dwellings must make provision for 40% of all dwellings to meet Requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings. Dwellings that meet Requirement M4(3) of Part M of the Building Regulations will be supported and can count towards the requirement above. The design and access statement notes that the development will be accessible to all. The exact location of properties to meet the above requirements have not been noted on the plans; however a condition can be added to secure this requirement seeking a plan to demonstrate which dwellings will meet Requirement M4(2) of Part M of the Building Regulations, this will not alter the overall layout or style of properties.

<u>Heritage</u>

- 7.37. The site is located close to Wrentham's Conservation Area and a number of other heritage assets. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area" given the sites proximity to the Conservation Area the councils design team have reviewed the submitted documents. The submitted Heritage Statement meets the requirements of the NPPF Paragraph 194. Paragraph 206 of the NPPF states "that Local planning authorities should look for opportunities for new development...within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably" The submitted Heritage Assessment correctly takes into account the relevant designated heritage assets which include the Conservation Area the setting of which will be altered by this development in accordance with policy WLP8.9 Conservation Areas,
- 7.38. There will be a change in the character of the land that forms part of the setting to the identified heritage assets noted within the Heritage Assessment, which include but are not limited to the following Grade II listed buildings 6, 8, 10 Priory Road; The Priory; and the Prior Farmhouse which lie to the north of the site and Wrentham Conservation Area.

Planning (Listed Buildings and Conservations Areas) Act 1990 sets out the general duty as respects listed buildings in exercising planning function. This includes the need to have special regard to the desirability of preserving the building or its setting. Paragraphs 199 and 202 of the NPPF notes the weight to which the asset should be given when considering the impacts of a development. The change in character has been considered in this manner noting that the change will arise from the change in use from agricultural land to the built development. However, aside from the parish church (which is more remote and unaffected), the identified assets all form part of the village of Wrentham which has a built character. The development here will also form part of the built character of Wrentham and will not be adverse in its impact. Any indirect impacts on the setting of heritage assets have been taken account of in the design of the development's layout and, therefore there will be no harm arising from this proposal, the principle of which is already approved by the allocation, and the detail of which is acceptable. The proposals accord with the above mentions paragraphs of the NPPF and Policies WLP8.37 Historic Environment which seek proposals for development to conserve or enhance Heritage Assets and their settings.

Residential Amenity

- 7.39. Policy WLP8.29 (Design) of the Local Plan promotes development that integrates well into its context in terms of neighbour amenity and living conditions. Third party comments have raised concern over amenity, however the closest neighbouring properties to the development will be those on Chatten Close. A perimeter block form has been used to ensure that all properties within the site and adjoining the neighbouring development have a back-to-back relationship. The distance between the properties on this southern boundary is a minimum of 30 metres. There is one property on this row which would result in a side to back relationship where the distance to the boundary is 20 metres. These distances are acceptable and would not result in any direct overlooking. The single storey scale properties on the northern boundary will protect the amenity of those properties to the north which are located on a lower ground level.
- 7.40. Although there will be short term disturbance during the development of the site these impacts can be controlled and mitigated through a construction management plan secured by condition. This policy also requires a good standard of amenity for future occupiers of the proposed development, the proposal allows generous garden sizes with suitable outlook and no unacceptable overlooking. The design quality of the proposal is acceptable and provides a good standard of amenity for both existing/neighbouring and future residents. The layout is in compliance with Policy WLP8.29 in terms of amenity.

Landscape and Visual Impact

- 7.41. Policy WLP8.35 seeks to ensure that development is informed by and sympathetic to the distinctive character areas and strategic objectives. Development is expected to demonstrate that their location; scale; form; design; and materials protect the special qualities and local distinctive of the area.
- 7.42. The application include a Tree Survey and Arboricultural Impact Assessment and Method Statement by Oakfield Arboricultural Services. A total of 16 individual trees and 6 groups have been assessed, these are mix of standard trees and hedgerows. These are a mix of Oak, Ash, Lime, Hawthorn, Goat Willow, Birch, Field Maple, Blackthorn, Hazel, Pine and Cypress.

The best trees on the site are T1 & T5 Oak. This proposal requires the removal of G5 mix Blackthorn and Hazel (behind plots 24 & 25) and part of G7 Field Maple and Hazel (located on roadside frontage) for access / visibility splays. A landscape scheme mitigates the loss of G5 & G7. All construction is shown to be outside root areas and although no new service runs are shown on plans, these could be located within roads and away from retained trees.

- 7.43. The survey states that any need for tree works due to proximity to dwellings and/or shade is considered very low, and not of any significant concern. Drawing No. OAS 21-032- TS03 TS04 details the Tree Protection Plan. The proposed development requires minimal tree removals to accommodate the layout.
- 7.44. There is a tree belt running along the boundary of this site and Chatton Close, given the nature of the development and importance of these tree belts, a management plan should be put in place to ensure that these are adequately managed throughout the development's lifespan. This information will be requested through condition, where permission is granted.
- 7.45. The allocation policy is clear in its requirement that the Landscaping scheme is informed by the Waveney District Landscape Character Assessment and in respect of the Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study which was published in September 2016. This records that, the landscape surrounding the settlement falls within the following Great Yarmouth and Waveney District Landscape Character Areas:
 - 13: Sotterley and Benacre Plateau
 - K1: North Suffolk Sandlings
 - H7: Blyth and Wang Tributary Valley Farmland
- 7.46. The key features and characteristics of the landscape around Wrentham that apply to this site are summarised as follows:
 - Remnant Historic Landscapes: The landscape to the north-west and west of Wrentham is comprised remnant historic, pre-18th Century enclosure of random fields.
- 7.47. The fieldscapes to the east and south are made up of 18th Century and later enclosure of former common pasture, and former common arable or heathland. In the far south-west of the study area a block of modern plantation woodland exists on former common pasture, and a parcel of remnant ancient landscape, irregular co-axial fields. The edges of Wrentham are predominantly sensitive.
- 7.48. The application site falls within landscape setting area 4 as defined by the study, the key features of which are:
 - Small and medium-scale field pattern
 - Field boundaries predominantly hedgerows with hedgerow trees
 - Oak standards
 - Large plantation woodland in the south adjacent to watercourse

- Wrentham Cemetery County Wildlife Site
- 7.49. Wrentham is considered to have moderate strength of place, apparent visibility, moderate landscape sensitivity, and moderate landscape value. Overall, it is considered to have a high landscape capacity for development as a result of its moderate landscape sensitivity, moderate landscape value and limited contribution to the setting of the AONB. This area has historic continuity which is evident in the coherent landscape patterns of fields. The LSA is adjacent to the Conservation Area in Wrentham and contains a small County Wildlife Site which contributes to the area's landscape value. Woodlands are generally not characteristic of this area, although hedgerow trees are, and can be found in large numbers along hedged lanes and field boundaries. There are some visual detractors within this setting area such as polytunnels, but these are temporary. Visibility within this LSA is moderate, as some extensive views are possible, typically through gaps or gateways in the hedges. There are very limited views of the undeveloped farmland within this LSA from within the AONB.
- 7.50. The definition of high landscape capacity is the landscape is assessed as having low to very low landscape sensitivity and low to moderate landscape value Subject to appropriate siting, design and landscaping mitigation, large, medium and small-scale new development could potentially be accommodated within the landscape without eroding positive key features and characteristics which are desirable to safeguard.
- 7.51. The application is accompanied by a professionally prepared landscape and visual impact assessment (LVIA) which assesses the site against the sensitivity study as well as the various tiers of landscape character assessment and has identified that the site is reasonably typical of the various assessments. It also notes that the existing settlement edge accords the site a reduced level of sensitivity to further development. It goes on to state: The immediate setting to the south and southeast of the site has established and unremarkable residential estates with no particular landscape merit. This setting would be considered to have low sensitivity to the type of development being proposed. However, the setting to the northeast, north and west provide aspects of remnant historic landscape, including several listed buildings within the village conservation area. There are not expected to be direct changes to areas beyond the site boundary but clearly the character of the setting will be altered. Overall, the immediate setting is therefore considered to have medium sensitivity to the type of development being proposed.
- 7.52. There will be some adverse landscape effects arising from what is anticipated to be a two year construction period, but these are temporary, and confined to the immediate locality. With the proposed landscape planting programme, and taking account of the nature of the development, it is predicted that the development will have a moderate to slight effect on the immediate setting of the site, with only slight or neutral effects on the wider setting.
- 7.53. Visual impacts are assessed from a range of surrounding viewpoints none of which are identified as having significantly adverse effects, apart from some immediately adjacent residential properties, but not from public viewpoints. It is concluded that with an appropriate landscape mitigation package, which can be finalised in detail through conditions attached to any planning consent, and through appropriate choice of building materials as approved, there will be no adverse landscape or visual impacts arising from the development once new landscape planting has become established and is maturing. On this basis the landscape scheme is policy compliant.

Open Space

- 7.54. Policy WLP1.3 Infrastructure states that "Open space should be provided on residential development sites of 1 hectare or more in size and be based on the needs identified in the Waveney Green Infrastructure Strategy and Open Space Needs Assessment". Policy WLP8.30 sets of the design requirements of securing open space within residential developments which must be inclusive of people of all ages and abilities. The allocation providing the position of the open space as part of its compliance, whereby the open space is to be located towards the front of the site to ensure it is accessible to neighbouring developments.
- 7.55. Accessible public open space is amply provided for within the layout shown and, both in the southern and in the northern part of the site. A smaller area (the circus) is provided for within the built layout, itself, which will be different in character to the larger public open spaces. Connectivity to these spaces is well provided for and the site is small enough to allow easy access to them from all parts of the site and beyond.
- 7.56. The northern green space is a green buffer which hosts the infiltration basins, this land will be fully accessible, and the footpath is shown through this area. The proposed treatment as a meadow does suggest a semi-wild character and that will make it an attractive transitional space. The open space towards the front of the site, will include an equipped play park, details of which shall be conditioned, this area will be laid to grass with a tree/hedgerow boundary and nature areas. Both a footpath and cycle path adjoin this area. All three open spaces are well overlooking with active frontage facing them. The spaces are accessible without crossing a main road and they are separate from areas of vehicle movements. The spaces have been well incorporated into the layout and is a prominent feature of the site and is policy compliant.
- 7.57. The provision of open space will be secured through a Section 106 agreement; and the details for the future long term management of this open space is to be secured by condition to ensure that the space is properly maintained throughout the life time of the development.

Highways and Sustainable Transport

- 7.58. The Local Plan policy WLP8.21 relates to sustainable transport and seeks, amongst other things, to locate and design development so it can be accessed via multiple modes of transportation, and with safe and suitable access for all. Section 9 of the NPPF supports these policy requirements and promotes opportunities to walk, cycle or use public transport. Policy WLP8.21 "Sustainable Transport" of the Local Plan also states that development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.
- 7.59. East Suffolk Council is at the early stage of producing a Cycling and Walking Strategy, which will supersede the Waveney Cycle Strategy (2016), the recommendations in this document suggest the introduction of a cycling and walking track along the western and southern site boundaries which should be linked in to PRoW No.6. This has been incorporated into the scheme layout, where the informal walking routes discussed by third parties have been incorporated into a walking route which connects around the outskirts of the site through the public open space. A cycle route has also been included, both of which link to the

opposite side of Chapel Road via a dropped kerb and new path which connects to the PROW. This is shown on drawing 503P7. The approved plan CLW-CF-ZZ-XX-DR-A-0503-P7 Highway Plan show the cycle route and pedestrian crossing including the widening of the footpath on the opposite side of Chapel Road, these improvements will be carried out prior to occupation of the dwellings compliance of which will be secured through conditions.

- 7.60. A road pinch point was recommended, by the councils policy team through the cycling and walking strategy, for introduction to help reduce speed limits on entry into the village which is the main concern raised by third party responses and the Parish Council, however this was not supported by the County Highway Authority. As a compromise the development includes an entry sign into the village located 25m before the 30mph sign. This gateway will be used to promote the upcoming speed change and entry into the village.
- 7.61. Suitable cycle storage provision can be secured through appropriate planning conditions.
- 7.62. Third party objections raise the concern that there is not sufficient facilities in the village to support this growth, such as there not being a primary school. Where children currently have to travel to receive both primary and secondary education. It is noted that the County Council have requested a contribution for both primary and secondary school transport costs of £192,800 which will be secured through the S106 legal agreement. An additional concern raised was the location of the informal school bus stop on Chapel Road outside the development site, which was considered by third parties to be unsafe. The road along this part of the development has been widened to 5.5metres to create additional space for a bus to stop and allow traffic movement past. The County Council did not consider that there was a requirement for a new permanent bus stop in this location and the compromise is considered acceptable in addressing the third party concerns.
- 7.63. A safe and suitable access will be provided and proportionate contributions and works to encourage sustainable transport modes are accepted which are considered to meet the requirements of Policy WLP8.21 "Sustainable Transport". The proposal would not have an unacceptable impact on highway safety and would accord with the principles set out in the NPPF.
- 7.64. The County Highway Authority have approved the access arrangements and the overall layout within the site, where a refuse strategy has been provided.
- 7.65. Parking is shown as a mixed provision with on-street, on-plot, frontage and garaging. Visitor parking is accounted for by on-street designed-for bays. The general avoidance of frontage parking is a merit of the layout and should be recognised as such. The layout will definitely help avoid car-dominated frontages to streets and streetscenes. The parking standards have been met and the scheme is considered to be policy compliant where relevant contributions in relation to school transport costs set out above are secured.

Sustainable Construction

7.66. Policy WLP8.28 "Sustainable Construction" of the Local Plan requires that proposals for major residential development of 10 or more houses and commercial development schemes of 1,000sqm or more of floorspace should demonstrate through the submission of a sustainability statement that, where practical, they have been incorporated. This should include matters such as:

- Improved efficiency of heating, cooling, and lighting of buildings by maximising daylight and passive solar gain through the orientation and design of buildings.
- Sustainable water management measures such as the use of sustainable drainage systems, green roofs and/or rainwater harvesting systems.
- Locally sourced and recycled materials.
- Renewable and low carbon energy generation into the design of new developments. Larger schemes should explore the scope for District heating.
- Minimising construction waste, including designing out waste during the design stage, selecting sustainable and efficient building materials and reusing materials where possible.
- Accessible and unobtrusive sustainable waste management facilities such as adequate provision of refuse, recycling and composting bin storage.
- A show home demonstrating environmentally sustainable options which can be purchased and installed in homes bought off-plan.
- 7.67. A sustainable construction statement has been submitted as part of the suite of documents. In terms of reducing CO2 emissions, it states that the design of low energy dwellings will be done by ensuring the 'U' values will be higher than those minimally required through building regulations. Air Source heat pumps will be used for all units to deliver both heating and hot water with intelligent thermostatic timed controls installed. Photovoltaics will be installed on all southern facing roof slopes. The development will achieve a target of 20% below the Co2 emission rate stipulated within Part L of the Building Regulations.
- 7.68. In terms of other sustainable elements. An integrated SUDs system, described below, will be incorporated into areas below driveways and to soakaways serving the roofs to ensure that all surface water is managed onsite. Dual flush toilets will be installed. A water efficiency of 1110 litres/person/day will be introduced. In addition, passive ventilation will be adopted where possible and dedicated areas for the separation and storage of waste will be provided.
- 7.69. The developers will prioritise the use of locally sourced materials and workforce and have a construction policy to manage site waste with an emphasis on reducing waste through efficient use of materials and reduction in product taken to landfill. The guidance and strategies put forward in the sustainability report will be conditioned to ensure that the construction meets the requirements of WLP8.28.

Flood Risk and Surface Water Drainage

- 7.70. The site is predominantly located in Environment Agency Flood Zone 1 and therefore sequentially preferable for residential development. A surface water drainage strategy has been provided and is deemed acceptable by the Local Lead Flood Authority (LLFA).
- 7.71. The site slopes from south to north, currently draining into the River Wren which is located to the north of the development site. Whilst there is a flood zone buffering this river, the built up area of the site lies well outside that zone. There has been local concern over flooding in this area, mainly to those properties located to the north of the River, the LLFA

has reviewed the information submitted and confirmed that there will be no additional pressure on the river as a result of this development. The surface water will be managed on site through a sustainable drainage system (SUDS)

- 7.72. Policy WLP8.24 (Flood Risk) notes that development should use sustainable drainage systems to drain surface water. These systems should be integrated within the landscaping scheme and the green infrastructure provision of the scheme.
- 7.73. The system proposed for the development relies on the use of infiltration into the ground which feeds water to both the swales located centrally on the site and any overflow to the large infiltration basin to the north west corner of the site. Any overflow from this basin will be discharged into the watercourse at a limited rate. The existing basin supporting the Catten Close estate will not be affected by this system.
- 7.74. Swales have been used along the open space from the front of the site through to the centre. A large swale running along the southern edge of the open space to the north of the site is shown to ease water into the infiltration basin from the surface water network. These shallow swales have been designed as part of the landscaping within the overall site. New hedging has been provided on the northern boundary which will be raised on an earth bund. This bund will act as a buffer in the unlikely event of a serious storm ensuring that excess water would not cause any adverse impacts to the neighbouring properties, this has been included in direct response to the parish council concerns and those raised by third parties.
- 7.75. Several large soakaways have been included throughout the development where achievable meeting building requirements. In addition, rain gardens have also been incorporated into many of the front gardens of individual plots.
- 7.76. The proposed drainage system conforms to the drainage hierarchy requirement of firstly infiltration. The overflow system provides an extra safety margin above the 40% climate change, 10% creep and 10 times factor on the infiltration rate to ensure a robust drainage network for surface water. The swales, raingardens and basin provide surface water treatment in excess of the requirements. All provide a robust surface water network for the development and reduce the flood risk off site.
- 7.77. The SUDS scheme has been well designed and thoroughly considered to ensure that it integrates seamlessly into the overall landscaping scheme to provide a holistic approach to the management of surface water and the overall development of the site. The proposal accords with WLP8.24 (Flood Risk).

Ecology

7.78. The application is supported by an Ecological Impact Assessment (EcIA) (Norfolk Wildlife Services, June 2021) and the conclusions and proposed mitigation measures identified are broadly acceptable and policy compliant.

Protected Species and UK Priority Habitats and Species

7.79. The EcIA concludes that in the absence of mitigation measures, minor adverse impacts on foraging bats and nesting birds are likely as a result of the development. Neutral impacts on reptiles, amphibians and other mammals (badger, brown hare and hedgehog) are predicted.

- 7.80. The EcIA includes appropriate mitigation measures which will reduce the identified adverse impacts to neutral impacts. Conditions are recommended below to secure the necessary mitigation measures.
- 7.81. The development will also involve the loss of a section of hedgerow (a UK Priority habitat) on the southern boundary of the site to create the access. However, the landscape planting for the proposed open spaces (drawing no. LS 00) includes hedgerow planting of greater length than that to be lost. Whilst there will be a short term loss of hedgerow habitation site whilst the new planting matures, in the long term a greater amount of this habitat type will be available than is currently the case. A condition securing the long term management of the newly created open space habitats, via a Landscape and Ecology Management Plan (LEMP), must be included should permission be granted.
- 7.82. The EcIA also includes a list of ecological enhancements which are broadly appropriate for the development, although the final specification should also include integrated swift bricks in an appropriate number of the new dwellings. Whilst there are details of suitable enhancements provided, further information on the exact installation locations of bird and bat boxes/bricks and hedgehog access points is required, which can be secured by condition.

Habitats Regulations Assessment (HRA)

- 7.83. 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 council has carried out its own HRA which has been submitted to Natural England.
- 7.84. As recognised in the EcIA, the application site is within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) zone of influence (within 13km of Benacre to Easton Bavents SPA; the Minsmere-Walberswick SPA; the Minsmere-Walberswick Ramsar Site and the Minsmere-Walberswick Heaths and Marshes SAC). In order to mitigate the increased recreational disturbance impacts on European designated sites arising in_combination from new residential developments a suite of mitigation measures are required as part of this development. The attached draft Habitats Regulations Assessment (HRA) considers this issue in more detail and a summary of the required measures is set out below:
 - A financial contribution to the Suffolk Coast RAMS (65 dwellings x £321.22 per dwelling = £20,879.30), either as part of the S106 agreement or paid upfront;
 - Provision of approximately 2Ha of onsite open space (in accordance with the submitted plans);
 - Provision of onsite walking routes and connections to the wider public rights of way network (in accordance with submitted plans);

- Provision of dog waste bins as part of the open space provision, which can be secured by condition; and
- Secured long term management of the open space areas via a Landscape and Ecology Management Plan (LEMP), which can be secured by condition.
- 7.85. Natural England have been consulted on the HRA and raised no objection providing the above mitigation measures are carried out in full. The proposal is acceptable in this regard in accordance with WLP8.34 (Biodiversity and Geodiversity).

<u>Archaeology</u>

- 7.86. The site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER). The county's Archaeological Services note that the site was subject to pre-application archaeological evaluation (HER ref no. WRE 079), which identified two areas where archaeological features are present and require an archaeological excavation to be undertaken prior to the commencement of the development on this site. The archaeological features present on this site date from the Early Neolithic, Neolithic Early Bronze Age, Roman, Early Saxon and high-late medieval periods. As a result, there is high potential for the discovery of additional below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.
- 7.87. The allocation policy notes that any planning application should include the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impact. An Archaeological Evaluation was provided as part of the submission which meets policy requirements.
- 7.88. The consultation response acknowledges the findings of the submitted report and notes that there is no grounds for refusal based on these finding, however conditions requiring the implementation of a programme of archaeological work is secured and subsequently completed. With conditions the scheme accords with WLP8.40.

Financial Contributions

- 7.89. Paragraph 57 of the NPPF is clear that planning obligations should only be sought where they meet all the following tests:
 - Necessary to make the development acceptable in planning terms.
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 7.90. Within the response from SCC a contribution of £192,800 has been requested to provide primary and secondary school transport.
- 7.91. The affordable housing provision of 20 dwellings is policy complaint and the mix is agreed as such no additional commuted sum is required.
- 7.92. The RAMs payment set out above will be sought through the S106.

7.93. In this instance the requirements for above contributions would meet the three tests within paragraph 57 of the NPPF. The request is related to the development and is reasonably related in scale and kind to the development as such will be sought through the section 106 agreement.

Community Infrastructure Levy (CIL)

- 7.94. Policy WLP1.3 "Infrastructure" requires developers to consider the infrastructure requirements needed to support and service the proposed development. All development will be expected to contribute towards infrastructure provision to meet the needs generated.
- 7.95. The Community Infrastructure Levy (CIL) is "a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use them to help deliver infrastructure needed to support development in their area".
- 7.96. The proposed development falls within Zone 3 of the Waveney charging schedule = £60/sqm + indexation. A permission granted in 2021 has a zone 3 charge of £89.20 per sqm of GIA. There is relief available for affordable housing where the criteria set out in the CIL Regulations is met.
- 7.97. There is no dispute from the developer that CIL contributions will be met. Therefore the local needs for infrastructure can be addressed. The Council meets regularly with Infrastructure providers to ensure that infrastructure is being planned in a way which is aligned with growth and to ensure that timely CIL bids are submitted for essential infrastructure. This includes primary school expansion at Reydon, Brampton or Kessingland Primary Schools. Secondary School expansion and local pre-school expansion/delivery. Opportunities for Primary Healthcare expansion is also a priority where guided by the CCG.
- 7.98. The development will generate a 15% proportion of Neighbourhood CIL which will be transferred to the Parish Council to spend on local infrastructure needs and this is a benefit of the development in supporting the quality of infrastructure in the village.

8. Conclusion

- 8.1. Paragraph 2 of the NPPF (2021) states that "Planning Law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise". That section of the law is contained in S38(6) of the Planning and Compulsory Purchase Act 2004.
- 8.2. The starting point is therefore the Development Plan. The application site is allocated under Policy WLP7.4 whereby the level and type of development proposed meets the criteria noted within that policy.
- 8.3. No harm has been identified by any indirect impacts on the setting of heritage assets which include a number of listed buildings and the setting of the Conservation Area, all of which have been taken account of in the design of the development's layout.
- 8.4. The Parish Council and third party concerns regarding Highways has been taken account of and mitigated against in the proposals which include improvements to the Highway with the inclusion of a village entry sign to slow traffic coming into the village; a widening of the Highway outside the site to accommodate the school bus; a new accessible foot and cycle

path which connect the previous informal footpaths around this site with the PROW system.

- 8.5. The proposal is considered to represent sustainable development in accordance with the objectives of the National Planning Policy Framework and adopted Local Plan. The proposals have been revised to meet the requirements of the Highway Authority and provide suitable safe access; suitable parking provisions; cycle storage and well-designed refuse layout. The development has included enhancement to the existing road network with the increase in width of road to enable the school bus to be more suitably accommodated and the introduction of a village sign which will help slow traffic at entry point into the village. The scheme includes a footpath and cycle network both in and out of the site allowing provisions to join the hierarchy of PROW routes.
- 8.6. The development has a provided a comprehensive SUDs scheme which includes the use of infiltration basins and swales which form part of a coherent landscape scheme.
- 8.7. The proposal represents a sustainable form of development and is recommended for approval.

9. Recommendation

- 9.1. AUTHORITY TO APPROVE with conditions (including but not limited to those summarised in section 10 of this report); and subject to the completion of a S106 Legal Agreement within six months to secure obligations (including but not limited to):
 - Affordable housing provision.
 - Provision of open space.
 - A financial contribution towards primary and secondary school transport.
 - Contribution towards RAMS (either S106 or S111)
- 9.2 Or, in the event of failure to complete the S106 within six months of the date of the Committee Meeting, AUTHORITY TO REFUSE the application.

10. Conditions

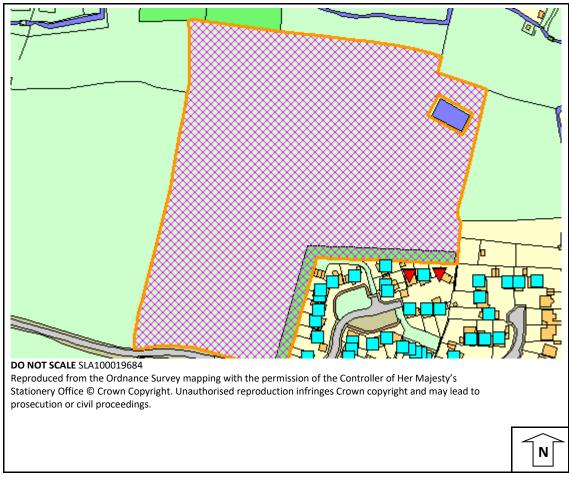
- 1. Three-year time limit.
- 2. Standard plans/drawings compliance.
- 3. Details of all external materials to be agreed prior to commencement.
- 4. New access laid out in accordance with approved plan and retained.
- 5. Details of means to prevent the discharge of surface water onto Highway prior to commencement.
- 6. Max gradient of Access compliance.
- 7. All parking and manoeuvring to be provided prior to use.

- 8. Clear visibility provided prior to use of access.
- 9. Details of electric vehicle charging points to be approved prior to commencement.
- 10. Details of cycle storage to be agreed prior to completion.
- 11. Submission of a construction management plan prior to commencement.
- 12. Highway improvements to be carried out prior to occupation.
- 13. Village sign to erected prior to occupation.
- 14. Cycle and pedestrian crossing carried out prior to occupation.
- 15. Details of estate roads and footpath to be submitted prior to commencement.
- 16. Footpaths to be secured prior to occupation.
- 17. New estate junction formed prior to other works being carried out compliance.
- 18. Residents Travel Pack (RTP) shall be provided to residents within one month of occupation.
- 19. Details for the disposal of surface water submitted prior to commencement.
- 20. Details of the implementation, maintenance and management of the strategy for the disposal of surface water prior to commencement.
- 21. Submission of surface water drainage verification report with 28 days of completion.
- 22. Details of a Construction Surface Water Management Plan (CSWMP) prior to commencement.
- 23. Unexpected contamination.
- 24. Submission of programme of archaeological works prior to commencement.
- 25. Post investigation archaeological works prior to occupation.
- 26. Landscaping scheme to be completed in the first planting season from the completion of the last building shell.
- 27. Details of a management and maintenance plan for the Open space prior to occupation.
- 28. Details meeting Part M Requirements submitted prior to commencement.
- 29. Development undertaking in accordance with ecological avoidance, mitigation, compensation and enhancement measures compliance.
- 30. No removal of hedgerows trees etc between 1st March and 31 August.
- 31. Submission of a lighting strategy for biodiversity prior to work above slab level.

- 32. Submission of landscape and ecological management plan prior to occupation.
- 33. Submission of Ecological Enhancement Strategy prior to work above slab level.
- 34. Details of fire hydrants prior to occupation.
- 35. Details of play equipment prior to occupation.

Background Papers

See application reference DC/21/2679/FUL on Public Access



Key



Notified, no comments received



Objection



Representation



Support