



PLANNING COMMITTEE SOUTH - UPDATE SHEET 22 November 2022

Item 6 – DC/22/2831/OUT - Outline application (some matters reserved) - Outline application with all matters reserved apart from access. A phased development, including the erection of up to 35 custom/self-build homes (plots), with the development to include 12 affordable homes, public open space that will include equipped play and multi-use games area, landscaping, and other associated infrastructure – Land at Victoria Mill Road, Framlingham

*Note: Deletions shown in ~~strike through~~; and additions shown in **bold**.*

Third-party consultation comments – para. 5.1

5.1 ~~At the time of writing this report,~~ A total of ~~70~~**71** third-party response were received, all of which have objected to the development. Concerns raised within the objections are summarised below:

Highway safety/traffic impacts:

- Unsuitability of access via Victoria Mill Road due to the narrow/blind bends.
- Highway changes to road layout unnecessary and the realignment of road would lead to increased highway safety concerns.
- The proposed road straightening would not lead to an increase in widths and pedestrian safety not accounted for (footpath widths not legally compliant).
- The development would lead to increased traffic/congestion within the area, which in turn would lead to increased noise and air pollution.
- The lack of public transport results in a further reliance on car travel – exacerbated further due to no local employment.
- Concerns relating to construction traffic impacts, in terms of environmental and highway safety impacts – particular reference to the nearby children's nursery.
- Subsequent loss of green spaces designated as Assets of Community Value.
- Land ownership dispute relating to green verge alongside the northern elevation of The Granary.
- Submitted plans do not indicate accurate highway measurements.
- Potential impact on heritage features and archaeology.

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- Parking provision unknown – development likely to lead to overspill parking on Victoria Mill Road.

Overdevelopment/lack of infrastructure:

- Framlingham has already exceeded the planned number of homes for the period up to 2031 – further development will lead to a loss of identity, leaving Framlingham poorer and dilution of community.
- Overall lack of amenities within the town to serve further development.
- Additional pressure will be placed on local services/infrastructure.
- The loss of open countryside will negatively impact of biodiversity and wildlife.
- What is actually needed is: suitable/accessible play provision, a youth club, community centre, mitigation measure to reduce CO2.
- Concern that the inclusion of agricultural access to southern extent shows intent for further development.

Design and conservation:

- Lack of information submitted to inform whether the proposal is adequately designed, particularly with reference to the sensitive site boundaries.
- Scale and type of proposal exceeds policy expectations in terms of density/quantity of housing. Concern regarding the impact on the historic importance of the Victoria Mill buildings, green verges due to the proposed road alignment.
- No evidence of self-build demand provided.
- Self/custom-build does not appropriately meet affordable housing requirement - concerns regarding CIL implications.
- Unclear and lack of commitment regarding pedestrian and cycle routes.
- The effect of an application on the significance of a non-designated heritage asset (The Mill House) should be taken into account.

Flood risk/drainage:

- Concern regarding flooding and suitability of proposed drainage systems (inc. drainage and sewerage).

Other comments:

- Contrary to policy FRAM25 in terms of timescales of delivery.
- Contrary to Suffolk Design Guide Shape of Development Highways specifically Section 3.
- Contrary to pavement and pedestrian access in FRAM14.
- Sewer system in Victoria Mill Road is at capacity already and is not suitable for connection of further houses.
- Water supply to Victoria Mill Road is inadequate and unsuitable for drinking.
- The access issues the road is not compliant with required fire safety regulations for new building projects.
- No significant material changes to overturn previous refusal.
- **Revised material received; will the public have time to make comments?**
- **Concerns regarding the required felling of a mature Oak tree**
- **Updated plans refer to connections to the 'wider cycle network' but Framlingham does not have one.**
- **Unnecessary agricultural access point indicates clear intent to develop adjoining greenfield site.**

Note: All neighbour responses are available to view in full on Public Access.

Self/Custom-build – delivery and marketing (para. 9.26)

- 9.26 ~~Where serviced self-build or custom build plots are made available (i.e., the required highways and services are in place) but are not taken up after a set period of time [to be confirmed within the s106 agreement], permission may be granted for the plots to be developed by a developer. In such instances, the council will require evidence to demonstrate that the plots have been actively promoted as self-build and custom build plots, in accordance with the marketing guidance contained in Appendix E of the local plan. The self-build and custom build register will also provide a source of information in relation to potential interest. As the proposed development is specifically self/custom-build, the ability for a developer to build-out undeveloped plots after being unsold for a period of 12 months does not apply. As referenced by policy SCLP5.9, this mechanism should only be applied to 100+ dwelling schemes, which have to provide 5% of plots as self/custom-build.~~

Self/Custom-build - Self-build and custom-build register (para. 9.27 – 9.28)

- 9.27 ~~At the time of writing, the register~~ **Relevant data from the Council's self-build register as of 30 October 2022** evidence a demand for ~~52~~ **55** plots in Framlingham parish, which is only lower than that identified for Woodbridge (89 plots) - **293 entries would consider a plot outside of their chosen area(s) (of which 49 also selected Framlingham); and 173 entries chose anywhere in the district.** We therefore know that Framlingham is a desirable location within East Suffolk for self and custom build plots, and the proposed development is therefore ideally situated to help meet this identified need.
- 9.28 The Council considers that there are no undue concerns about meeting the self and custom housing need identified on the register. However, the up to 35 proposed self and custom build dwellings would help to further meet this demand.

Sustainable construction (paras. 9.111 – 9.112)

- 9.111 In line with **local plan** policy requirements, the proposed scheme should achieve higher energy efficiency standards that result in a 20 per cent reduction in CO2 emissions below the Target CO2 Emission Rate (TER) set out in the Building Regulations. Exceptions should only apply where they are expressed in the Building Regulations or where applicants can demonstrate, to the satisfaction of the Council, that it is not viable or feasible to meet the standards. Optional technical standard in terms of water efficiency of 110 litres/person/day should also be achieved.
- 9.112 Detail is to be submitted by way of a sustainability statement to address the requirements outlined under policy SCLP9.2, which is to be secured by a pre-commencement condition. **Other considerations to mitigate against climate change (e.g., maximising summer cooling through natural ventilation in buildings and avoiding solar gain; the provision of multi-functional green infrastructure, encouraging people to walk and cycle) are to be addressed within the reserved matters stages when considering layout and other design details.**

Environmental protection – new section

Land contamination

An East Suffolk Council environmental protection officer has reviewed the submitted Phase 1 Contaminated Land Assessment (by Canham Consulting, dated July 2022) and has raised no objection subject to conditions relating to the discovery of unexpected contamination.

Construction impacts

To ensure potential impacts of environmental pollution and additional vehicular movements in the area are minimised during the construction phase, a Construction Environmental Management Plan is required prior to commencement of development. This should contain information on how noise, dust, and light will be controlled so as to not cause nuisance to occupiers of neighbouring properties.

Air quality

Air quality was considered in the associated Environmental Impact Assessment Screening Opinion (ref. DC/19/3042/EIA), which concluded that potential emissions could arise from residential units heating equipment, traffic fumes; however, the volume of traffic will not result in significant impact, and any potential pollution will not be beyond that associated with normal occupation. The site does not fall within an air quality management area and is not raised as a consideration within the neighbourhood plan. Nonetheless, with reference to *Land-Use Planning & Development Control: Planning For Air Quality (2017)* guidance, an Air Quality Assessment or proportionate detail is required prior to commencement of development and the submission of reserved matters details to ensure baseline conditions are calculated and any potential impacts are sufficiently mitigated.

Mitigation measures already proposed includes infrastructure to promote modes of transport with a low impact on air quality (e.g., provision of electric vehicle charging points); and controlling dust and emissions from construction, operation and demolition via a construction management plan, secured by condition.

Draft conditions and informative - Condition 3

3. Prior to commencement of development (including any off-site highway works or site clearance) **and the submission of reserved matters**, an Air Quality Assessment shall be submitted to and approved in writing by the local planning authority. The assessment shall be in accordance with 'EPUK & IAQM Land-Use Planning & Development Control: Planning for Air Quality January 2017'. ~~The assessment should be proportionate to the nature and scale of development proposed and the level of concern about air quality. The scope and content of supporting information is therefore best discussed and agreed between the local planning authority and applicant before it is commissioned and contain the following:~~
 - a description of baseline conditions and any air quality concerns affecting the area, and how these could change both with and without the proposed development;
 - where relevant, the cumulative or in-combination effects arising from several developments;
 - construction phase impacts;
 - acceptable mitigation measures to reduce or remove adverse effects; and

- **measures that could deliver improved air quality even when legally binding limits for concentrations of major air pollutants are not being breached.**

Reason: In the interests of residential amenity and protection of the local environment.

Item 7 – DC/22/3221/FUL - Creation of a new row of 19 Beach Hut sites to the seaward side of an existing row at Manor Road, Felixstowe. These will provide relocation sites for the 14 displaced huts at the Spa in the row behind at Beach Hut Site, Manor Road, Felixstowe

Design and Conservation Comments

Design and Conservation Officer comments were received on 28 September 2022 – these were omitted from the report in error. The comments raise no objections to the proposals on heritage grounds, noting that the huts are not within the sightlines of the Martello Tower. The comments are as follows:

1. Introduction

This application is for planning permission for the creation of a new row of 19 Beach Hut sites to the seaward side of an existing row at Manor Road, Felixstowe, which will provide relocation sites for the 14 displaced huts at the Spa in the row behind.

2. Background

No previous input or request for pre-application advice, but this is a revised proposal following the refusal of the previous application DC/21/4756/FUL.

3. Site visit

A site visit has not been made as it has been possible to make an appropriate assessment based on the documents submitted with the application.

4. Heritage Statement

Although no Heritage Statement has been submitted with this application, some reference is made to heritage issues within the Design & Access Statement and the Heritage Statement submitted with the previous application. There is very limited assessment of the impact of the revised proposals and it would have been helpful for the Heritage Statement to have been resubmitted and updated with a full assessment of the impact of the current scheme.

5. Assessment of significance

The site is within the setting of the Coastguard Station on Langer Road, which lies to the north and is listed Grade II. It is also scheduled as the Martello Tower at the western end of the sea front, dating from c1810-12 used as a coastguard station. Built of gault brick with cement rendered stone dressings, it is a round tower with a flat roof upon which sits the coastguard building. It is a distinctive feature on the seafront and occupies a prominent position. Although the setting of the tower has changed over time including surrounding development, the sea wall and promenade, it still sits in an open landscape and retains the views out towards the sea.

6. Summary of proposals

As noted above.

7. Impacts and effects arising

The previously submitted Heritage Statement proposed 'sightlines' from the tower in order to protect the open character and views out on the seaward side. The Design & Access Statement notes that these lines have been taken into account with the new row of huts being positioned outside of the sightlines and located further to the south. However, even though they are located beyond these lines, there may well still be positions along the promenade where the beach huts will be visible in conjunction with views of the tower and other surrounding development or views out from the tower where the beach huts can be seen. It would therefore have been helpful to have a full assessment of the setting of the tower and the impact of the repositioned huts from key view points. Nevertheless, even if there is some degree of intervisibility between the huts and the tower resulting in a change to its setting, taking into account the scale of the huts and their distance from the tower, I do not consider that there will be a harmful impact on the significance of the tower as a designated heritage asset, which will retain its open landscape setting and open views out towards the sea.

8. Application of statutory and NPPF tests

In my view, the setting of the Martello tower will be preserved, in accordance with the statutory requirements of the Planning (Listed Buildings & Conservation Areas) Act 1990.

9. Conclusion

I would therefore not raise any objections to the proposals on heritage grounds.