



Committee Report

Planning Committee North – 11 January 2022

Application no DC/21/0027/FUL

Location

Halesworth Campus (Former Middle School Site)
Norwich Road
Halesworth
Suffolk
IP19 8PY

Expiry date 19 April 2021

Application type Full Application

Applicant Castlemeadow Care

Parish Halesworth

Proposal Hybrid Planning Application for Retirement Community development to include (i) Full Planning Application for 54 bed care home (Use Class C2, Block C), associated landscaping, parking, acoustic fencing, access from Norwich Road and waste storage and (ii) Outline Application with all matters reserved for 100 Extra Care apartments and communal facilities (Use Class C2, Blocks A and B) and administration, training and staff accommodation building (Block D)

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1. Summary

- 1.1. The proposal is a hybrid planning application for the redevelopment of the former Halesworth Middle School on the east side of Norwich Road in Halesworth. It seeks full planning permission for a care home and outline planning permission for extra care retirement apartments.

- 1.2. The site forms part of the allocation in the East Suffolk Council Waveney Local Plan 2019, for the Halesworth/Holton Healthy Neighbourhood (Policy WLP4.1), a comprehensive redevelopment to provide housing, health care facilities, retirement community and indoor and outdoor sports facilities on the former Middle School site and adjacent land. This application must be read alongside DC/21/0007/FUL also presented to this Planning Committee meeting for consideration. The two applications are mutually dependent on each other.
- 1.3. In accordance with Policy WLP4.1 the proposal to redevelop the former Halesworth Middle School site is regarded as enabling development for the re-provision of sports pitches on adjacent land. As such this application is being presented alongside the Full Planning Application DC/21/0007/FUL for a new grass pitch and artificial (3G) pitch and associated development. Collectively both applications will allow consideration of a major component of the Halesworth/Holton Healthy Neighbourhood allocated under Policy WLP4.1. Overall, the land areas, nature and quantum of development accords with Policy WLP4.1 and its indicative masterplan. A previous outline planning permission for 190 homes (DC/18/4947/OUT) east of this site off Harrisons Lane was consented in 2019 and also forms a fundamental part of the allocation, specifically through the provision of land for the 3G pitch and future sports and leisure development in the southern part of the allocation.
- 1.4. The principle of a care home and retirement apartments is accepted as being in accordance with the Local Plan allocation. Whilst the application has raised a number of issues and concerns as set down in this report, it is considered that subject to appropriate controlling conditions, these can be satisfactorily mitigated.

Case for Development

- 1.5. The site forms part of the Halesworth/Holton Healthy Neighbourhood under Policy WLP4.1 of the East Suffolk Council Waveney Local Plan (March 2019) which allocates 22.05ha of land comprising the former Halesworth Middle School site, North Suffolk Skills Centre and land to the south, for a comprehensive mixed use development comprising:
 - Residential development (approximately 215 dwellings) now consented under DC/18/4947/OUT;
 - Health Care Facility and Retirement Community;
 - Sports Facilities including, playing pitch, 3G pitch, and indoor sport facilities and
 - Education/Training Facility.
- 1.6. This application seeks consent for the health care and retirement community element of the Halesworth/Holton Healthy Neighbourhood. The principle of development on the site is therefore established and the application will help deliver the vision of the Halesworth Campus and Halesworth Health to provide additional sporting and health facilities in the town. The plans of these organisations will help promote healthier lifestyles for new residents and existing residents alike.
- 1.7. The detailed design for the care home specifically responds layout and design understanding which has resulted to Covid 19 in order to improve infection control. It is considered to be a contemporary high quality design.

1.8. The outline application for the proposed extra care apartments includes indicative proposals that demonstrate a design appropriate to the urban context of the site. The application sets scale and massing parameters of these apartment blocks but the final design will be subject to future reserved matters applications. Furthermore the application secures a number of design parameters to ensure detailed proposals are of high quality.

1.9. Both the proposed care home and retirement apartments are in a highly sustainable location with good pedestrian connectivity to the proposed adjacent sports facilities, the Cutlers Hill Surgery, town centre, train station and areas of new housing development.

Reason for Committee

1.10. This application is referred to the Planning Committee at the discretion of the Head of Planning and Coastal Management under the terms of the Scheme of Delegation due to the level of public interest and significance of the scheme.

Recommendation

1.11. Officers are seeking authority to approve the application with conditions, subject to completion of a Section 106 Agreement to ensure the timely provision of the sports pitches as proposed by DC/21/0007/FUL thereby ensuring continuity of sports pitch provision.

2. Site description

2.1. The site covers some 2.7ha in area located on part of the former Halesworth Middle School site (now demolished) to the north of Halesworth. The remainder of the school site and additional land to the south is subject to a separate, albeit linked, application by Halesworth Campus Ltd. to provide sports facilities (DC/21/0007/FUL).

2.2. Other than the proposed sports uses and the existing North Suffolk Skills Academy the site is bound by residential accommodation to the south and west and there are two residential properties adjacent to the northern boundary. Norwich Road (A144) marks the western boundary and forms the main route through Halesworth and the vehicular or pedestrian route from the site into the town centre. On the opposite side of Norwich Road are residential properties of varying scale and style ranging from bungalows to a four storey apartment block. Next to this is a water tower. Along the Norwich Road frontage to the site is a mature hedge and belt of trees. The junction of Norwich Road and Bungay Road is located adjacent to the south western corner of the site.

2.3. Leading from Bungay Road, and running along the southern boundary of the site is a cycleway/footpath which previously provided direct pedestrian access to the Middle School but it is not a designated Public Right of Way. Two residential properties are located immediately south of the path. Further residential properties are located along both sides of Bungay Road which also provides access to access to Cutlers Hill Surgery and the former Patrick Stead Hospital and the train station.

2.4. There are no listed buildings or other heritage assets within the site although there are two listed buildings within the vicinity these being Wisset Place at the Norwich Road/Old Station Road junction and Town Farm to the south east of the site. The site does not fall within any local or national landscape designations.

2.5. Wider context of development in town

3. **Proposal**

- 3.1. As will be noted from the description this is a hybrid application meaning it seeks consent for full planning permission on one part of the site and outline planning permission for another part of the same site.
- 3.2. The application seeks full planning permission for a 54 bed care home, access parking and landscaping (Block C). The outline element seeks consent for the principle of 100 extra care apartments and communal facilities and administration, training and a staff accommodation building (Block D). This would be the first phase of development.
- 3.3. The 100 extra care apartments would be provided in two blocks (A and B) each of 50 apartments fronting Norwich Road with the care home located to the rear. Primary vehicular is proposed from Norwich Road between the two apartment blocks with the care home on the south side of the access road, extending down to the southern boundary of the site, adjacent to the existing cycle/foot path. A secondary vehicular access is proposed from Bungay Road adjacent to the southern most apartment block B.
- 3.4. Shared surfaces are proposed to create a pedestrianised plaza that links the Extra Care apartments with each other and to the front-of-house aspect of the care home.
- 3.5. 37 car parking spaces are proposed for the care home (19 for staff and 18 for visitors) and 5 staff and visitor cycle parking spaces. A total of 137 car parking spaces are proposed for the apartments, including an area of undercroft parking to block B, although this will be subject to a reserved matters application.
- 3.6. Castlemeadow Care currently provide care services to over 450 people with complex care needs over 7 locations employing over 450 staff. It is anticipated that 140 residents will live within the proposed Extra Care apartments and 54 residents will live within the care home. It is anticipated that residents will come from within a 5 mile radius of the site.
- 3.7. Nursing care will be on hand 24/7 to assist with day-to-day life where required. In addition Castlemeadow Care have a vision to establish a 'Care Hub' for the community of Halesworth by offering the facilities available at the site for meetings, work, shops and gatherings to promote health and wellbeing in general. The development includes a restaurant, lounge bar/cafe, a hair and beauty salon and a multifunctional space offering wellbeing workshops, exercise classes and other activities,
- 3.8. Castlemeadow Care aim to offer on-site vocational training to staff members to bring employees from Halesworth and the wider community into the care profession.
- 3.9. Whilst it is important for such an application to be submitted by a care provider and for it to be well supported by such information, this application is not seeking a personal permission and therefore, should circumstances change, another care provider could deliver the development.

- 3.10. The proposed care home is a contemporary 3 storey pitched roof building consisting of a central spine containing the main reception foyer with a café, a variety of day space lounges and activity rooms, residents' facilities, care stations, treatment rooms and ancillary spaces. The adjacent service block comprises a restaurant and kitchen on the ground floor with staff rooms on the first floor.
- 3.11. Leading off the central spine of the care home are three separate wings, or "Houses", containing 9 bedrooms per floor (or 18 per house). This arrangement allows for each cluster of 9 bedrooms to be locked down independently in an infection scenario in response to Covid 19 and to improve infection control.
- 3.12. The Extra Care apartments and staff accommodation are subject to an outline planning application. However, the submitted Masterplan for the site shows the location and layout of the apartments in some detail. Indicative details of the design of the apartments are also contained within the submitted parameter plans and Design and Access Statement. These show the proposed apartment blocks to be 3 storeys high with the third floor set back behind a parapet and with 2.5 storey gables. Should the application be approved it would be expected that these parameter plans would inform any future reserved matters application.
- 3.13. Nature of Extra Care....C2 USE CLASS
- 3.14. An improved pedestrian/cycle route along the southern boundary of the site will be provided to link into the adjacent proposed sports facilities under application DC/21/0007/FUL. Provision will also be made for a new direct public footpath southwards to the Cutlers Hill Surgery.
- 3.15. The planning application is supported by the following documents:
- Planning Statement including an Affordable Housing Statement
 - Outline designs to include indicative massing proposals to give an understanding of building heights, styles and materiality for the 100-apartment retirement living, associated service and communal spaces and the staff accommodation building.
 - Detailed plans, sections, elevations and visualisations for the 54 bed care home
 - Landscaping scheme
 - Arboricultural Assessment
 - Ecological Impact Assessment
 - Heritage Impact Assessment
 - Design and Access Statement
 - Transport Assessment
 - Workplace Travel Plan
 - Flood Risk Assessment
 - Surface Water Drainage proposals
 - Utilities Statement
 - Site Investigation and Risk Assessment
 - Archaeological desk study
 - Health Impact Assessment
 - Energy and Ventilation Assessment
 - Viability Assessment

- 3.16. To address comments made during the consultation period revised and additional details were submitted to include amended site location plan, amended masterplan and landscape plans, highway details, flood risk assessment, ecological impact assessment and design parameter plans.

4. **Consultations/comments**

- 4.1. Ten representations objecting to the application have been received raising the following matters (inter alia):

- Loss of light and outlook
- Overshadowing
- Overlooking and loss of privacy
- Increased traffic and noise
- The apartments do not comply with the C2 classification
- The proposed apartments would tower over almost all the domestic buildings in the vicinity and would be completely out of place
- The apartments would completely overlook the private areas of our home
- Our visual amenity would be hugely affected
- There would be 24 hour light intrusion from the development
- Insufficient health and social care provision for the present population
- How could health and care services in Halesworth cope with such a large influx of people with extra support needs?
- The adjacent grass football pitch is a potential point of conflict
- Bus services in Halesworth are extremely limited
- Are there sufficient parking spaces on this development
- Very little mention of any practical way through this development by bike
- Trees and hedges should be protected
- Flooding concerns
- Impact on wildlife
- The proposal would look completely out of place
- Loss of green space
- Negative impact on property value and sale-ability
- Highway safety
- The design is too high and out of proportion with existing surrounding buildings
- The design is out of character with existing surrounding buildings and the character of a small market town
- Light pollution
- Construction disruption over a long period
- Due to Covid 19 a decision should be delayed
- Over development of the site
- Contrary to Policy WLP8.22 - Built Community Services and Facilities

- 4.2. One representation has been received supporting the principles behind the submission.

- 4.3. Revised highway, drainage and design details were submitted to address comments made during the initial consultation period and were subject to a further period of consultation.

4 representations objecting to the application have been received raising the following matters (inter alia):

- Inappropriate to locate elderly accommodation and sports pitches close to one another
- Noise and light intrusion
- Acoustic and ball stop fencing is needed to protect existing properties
- Concerned about landscaping proposals adjacent to our property
- Halesworth does not have a sustainable bus service
- Overdevelopment
- The proposed buildings are too high
- The site would attract crime and anti-social behaviour
- Domineering buildings are out of scale and character
- Highway safety
- No evidence of need
- Lack of doctors and care staff

5. Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Halesworth Town Council	21 January 2021	11 February 2021

Summary of comments:

Extract from Halesworth town Council's Extraordinary meeting held on 8th February, 2021: The decision was to recommend REFUSAL as noted below

a) Ref. No: DC/21/0027/FUL Hybrid Planning Application for Retirement Community development to include (i) Full Planning Application for 54 bed care home (Block C), associated landscaping, parking, access from Norwich Road and waste storage and (ii) Outline Application with all matters reserved for 100 Extra Care apartments and communal facilities (Blocks A and B) and administration, training and staff accommodation building (Block D) Planning Application
Halesworth Campus (Former Halesworth Middle School Site) Norwich Road Halesworth Suffolk IP19 8PY

The Chair of HTC's Planning Committee confirmed that his understanding was that ESC (East Suffolk Council) were looking at the C2 classification and if it met the C2 classification criteria.

Regarding the application Cllr Dutton proposed a series of objections which were later detailed in the resolution below;

After some further debate where some Cllrs expressed their support for healthcare facilities in principle but on a far less imposing development. Other views were that the two applications were not compatible; on the one side a retirement and care facility necessitating peace and quiet and on the other; sports facilities which would naturally produce significant levels of noise at times from in and around the pitches. Concerns with the loss of open spaces and the change this would have on

the character of the town as seen from the main approach along Norwich road.

The Chair concluded that the debate had appeared to have come to a conclusion and asked the Council to consider Cllr Dutton's proposal and it was then RESOLVED that the Council (by 9 votes to 2) recommended refusal of the application DC/21/0027/FUL for the following reasons:-

I. Scale and Dimensions

- a. Monolithic and overbearing - too urban for the approach road to a medieval market town.
- b. Too high - the neighbouring water tower is an inappropriate reference point

II. Layout and Density

- a. Very high density in Blocks A & B along Norwich Road. Care home and palliative care too close to proposed rugby/football training pitches.

III. Appearance and Design

- a. Too urban and out of keeping with the Suffolk vernacular architecture.

IV. Traffic & Parking

- a. 100 residents probably equate to 60+ cars as residents will be mobile so will need more parking places plus spaces for visitors and the public who are invited to use the facilities. Traffic concerns accessing Norwich Road.

V. Drainage and Flood Risk

- a. The surface water drainage report refers to an earlier scheme on Dairy Hill and is irrelevant for this application.
- b. Surface water run-off is a serious problem in Halesworth due to the heavy nature of the soil. A large part of this site will be covered by hard and some permeable surfaces which will increase the need to safely dispose of this additional surface water within the site's boundary.
- c. The only escape is down the drain under Bungay Road. Critical attention needs to be paid to the surface water disposal scheme which still needs to be presented.

VI. Impact on the Community

- a. A care home and 100 extra care rooms will need considerable medical support. Cutlers Hill is currently under severe pressure due to a shortage of Doctors and an already elderly population.

VII. Environment

- a. The heating system is going to be 'gas led' with contributions from air source heat pumps and PVs. The plan should be for a non-carbon system.

Although not a planning matter; Cllr Dutton was nevertheless concerned by the conclusion of the Financial Viability Assessment that states 'It is therefore our reasonable judgment that a viable scheme is one which contains 100 extra care apartments for market sale at considerable risk to the developer.'

The full draft minutes of the meeting is available on the Town Council's website
<https://halesworthtowncouncil.org.uk/the-council/past-meeting-minutes/>

Statutory consultees

Consultee	Date consulted	Date reply received
Sport England	27 January 2021	17 February 2021

Summary of comments:

Sport England raises no objection to this application which is considered to meet exception 4 of our adopted Playing Fields Policy. The absence of an objection is subject to the conditions being attached to any planning consent granted for application DC/21/0007/FUL.

Consultee	Date consulted	Date reply received
SCC Highways Department	21 January 2021	29 January 2021

Summary of comments:

Holding objection. Whilst the proposal is acceptable in principle, access and sustainable links to the site require amendment.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	21 January 2021	3 February 2021

Summary of comments:

Holding objection because the proposed surface water management strategy does not comply with national and local policy.

Non statutory consultees

Consultee	Date consulted	Date reply received
Great Yarmouth And Waveney Clinic Commissioning Group	26 August 2021	No response

Summary of comments:

No response.

Consultee	Date consulted	Date reply received
East Suffolk Drainage Board	4 February 2021	4 February 2021

Summary of comments:

We recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

Consultee	Date consulted	Date reply received
Anglian Water	27 January 2021	No response

Summary of comments:

No response.

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	27 January 2021	No response

Summary of comments:

Internal response; see report.

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	21 January 2021	12 February 2021

Summary of comments:

No objection. Conditions recommended.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	21 January 2021	5 February 2021

Summary of comments:

No objection subject to conditions.

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	21 January 2021	22 February 2021

Summary of comments:

Currently reviewing the application.

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	21 January 2021	27 January 2021

Summary of comments:
Internal response; see report.

Consultee	Date consulted	Date reply received
Disability Forum	21 January 2021	No response

Summary of comments:
No response

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	21 January 2021	5 February 2021

Summary of comments:
CIL library contribution to be the subject of a future bid.

Consultee	Date consulted	Date reply received
SUSTRANS	21 January 2021	No response

Summary of comments:
No response

Summary of comments:
Advisory comments on reducing the risk of crime or anti-social behaviour.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	21 January 2021	19 February 2021

Summary of comments:
No objection. Conditions recommended.

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	21 January 2021	22 February 2021

Summary of comments: Internal response; see report.

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	21 January 2021	7 April 2021

Summary of comments: Internal response; see report
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Consultee	Date consulted	Date reply received
SCC Andy Osman Emergency Planning	21 January 2021	No response

Summary of comments: No response
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Consultee	Date consulted	Date reply received
East Suffolk Economic Development	21 January 2021	No response

Summary of comments: No response
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Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	21 January 2021	27 January 2021

Summary of comments: A condition is required for fire hydrants.

Consultee	Date consulted	Date reply received
SCC Rights Of Way	22 February 2021	22 February 2021

Summary of comments: We accept this proposal subject to the following: A link is provided between the sites and Halesworth Public Footpath 17 at Dairy Hill to connect the development to the Doctors Surgery.

Consultee	Date consulted	Date reply received
The British Horse Society	1 February 2021	1 February 2021

Summary of comments: No objection in principle. Loam Pit Lane should be upgraded to Bridleway status.

Reconsultation consultees

Consultee	Date consulted	Date reply received
Halesworth Town Council	2 September 2021	23 September 2021

Summary of comments:

Comments:

After some debate it was clear that the revised application did not address most of the concerns of the Town Council (noted in the minutes 56.3 8th February, 2021) to any significant degree and it was RESOLVED that the Council recommended refusal of the application DC/21/0027/FUL on the followings grounds:-

1. The application would set a precedent for similar applications. Halesworth was at risk of becoming a retirement town.
2. The current infrastructure was not in place to serve this proposal especially as regards the provision of medical and care infrastructure which is inadequate for the current population
3. The site was not an urban location but a thinly populated approach road to a small market town and the design was inappropriate for the area
4. The Scale and Density was overbearing
5. The proposed gas heating is against the Government's commitment for a low carbon economy
6. It was at odds with the Government's move towards home care
7. A significant loss of an important open space
8. It does not serve local needs as can be demonstrated by the availability of similar 1 bed units in the town and the vacant beds in the existing care homes

Consultee	Date consulted	Date reply received
Norfolk And Waveney NHS CCG	2 September 2021	27 October 2021

Summary of comments:

No objection subject to additional CIL and S106 requirements in order to mitigate the impacts of these developments, and to support the extension and improvements to Cutlers Hill Surgery.

Consultee	Date consulted	Date reply received
Anglian Water	2 September 2021	No response

Summary of comments:

No response.

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	2 September 2021	No response

Summary of comments:

Internal response; see report.

Consultee	Date consulted	Date reply received
Disability Forum	2 September 2021	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Economic Development	2 September 2021	14 September 2021
Summary of comments: Supports the application.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	2 September 2021	1 October 2021
Summary of comments: No objection. Conditions recommended.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	2 September 2021	21 September 2021
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
SCC Andy Osman Emergency Planning	2 September 2021	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	2 September 2021	3 September 2021
Summary of comments: Require a condition for fire hydrants.		

Consultee	Date consulted	Date reply received
The British Horse Society	2 September 2021	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	2 September 2021	9 September 2021
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	2 September 2021	No response
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	2 September 2021	7 September 2021
Summary of comments: No objection.		

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	2 September 2021	20 September 2021
Summary of comments: Previous comments apply.		

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	2 September 2021	2 September 2021
Summary of comments: No objection. Conditions recommended.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	2 September 2021	15 September 2021

Summary of comments: Holding objection.

Consultee	Date consulted	Date reply received
SCC Highways Department	2 September 2021	28 October 2021

Summary of comments: The application should be refused until an updated proposals plan has been submitted by the applicant showing the proposed traffic calming measures.

Consultee	Date consulted	Date reply received
SCC Rights Of Way	2 September 2021	24 September 2021

Summary of comments: The inclusion of walking and cycling routes is welcomed.

Consultee	Date consulted	Date reply received
Sport England	2 September 2021	13 September 2021

Summary of comments: Support, subject to conditions.
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Consultee	Date consulted	Date reply received
Suffolk Police Designing Out Crime Officer	2 September 2021	No response

Summary of comments: No response.

Consultee	Date consulted	Date reply received
SUSTRANS	2 September 2021	No response

Summary of comments: No response.

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	2 September 2021	4 October 2021

Summary of comments: Internal response, see report.

Consultee	Date consulted	Date reply received
East Suffolk Economic Services - N. Rickard 50+ Dwellings	2 September 2021	14 September 2021

Summary of comments:
Supports the application.

Consultee	Date consulted	Date reply received
East Suffolk Drainage Board	2 September 2021	No response

Summary of comments:
No response.

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	13 October 2021	No response

Summary of comments:
No response.

Consultee	Date consulted	Date reply received
Natural England	23 November 2021	

Publicity

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

Category	Published	Expiry	Publication
Major Application	19 February 2021	12 March 2021	Beccles and Bungay Journal

Category	Published	Expiry	Publication
Major Application	19 February 2021	12 March 2021	Lowestoft Journal

Site notices

General Site Notice

Reason for site notice: Major Application Affects Setting of Listed Building

Date posted: 19 February 2021

Expiry date: 12 March 2021

6. Planning policy

- 6.1. National Planning Policy Framework (2021) NPPF
- 6.2. The East Suffolk Council - Waveney Local Plan was adopted on 20 March 2019 and the following policies are considered relevant:
 - WLP1.1 - Scale and Location of Growth
 - WLP1.3 - Infrastructure
 - WLP4.1 - Halesworth/Holton Healthy Neighbourhood
 - WLP8.1 - Housing Mix
 - WLP8.2 - Affordable Housing
 - WLP8.21 - Sustainable Transport
 - WLP8.22 - Built Community Services and Facilities
 - WLP8.24 - Flood Risk
 - WLP8.28 - Sustainable Construction
 - WLP8.29 - Design
 - WLP8.31 - Lifetime Design
 - WLP8.34 - Biodiversity and Geodiversity
 - WLP8.37 – Historic Environment
 - WLP8.40 - Archaeology

Historic Environment Supplementary Planning Document

7. Planning considerations

Planning Policy

- 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 ("local plan") and any adopted neighbourhood plans. 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 site is sustainably located within the settlement boundary for Halesworth and forms part of the Halesworth/Holton Healthy Neighbourhood allocation under Policy WLP4.1 of the East Suffolk Council - Waveney Local Plan (2019). The principle of development on the site is therefore accepted. For completeness Policy WLP4.1 reads as follows:

The Halesworth/Holton Healthy Neighbourhood (22.05 hectares) as identified on the Policies Map is allocated for a comprehensive mixed use development comprising:

- *Approximately 215 dwellings;*
- *Health Care Facility and Retirement Community (approximately 2.3 hectares);*
- *Sports Facilities including, playing pitch, 3G pitch, and indoor sport facilities (approximately 8.6 hectares); and*
- *Education/Training Facility.*

The site should be developed in accordance with the following site specific criteria:

- *Residential development will be located on the northern and eastern parts of the site, which has an area of 7 hectares. The site will be developed at a density of approximately 30 dwellings per hectare.*
- *The health care facility and retirement community will be located on the north western parts of the site.*
- *The sports facilities will be located on the central parts of the site. Sports facilities on the site should include a 3G artificial pitch for all weather sports provision. This should be enabled by residential development on the site and appropriate delivery mechanisms and triggers will need to be agreed with the Council, in consultation with Sport England, to ensure the comprehensive development of the whole site in a coordinated and timely way.*
- *Redevelopment of the site will include replacement of the Apollo Youth Club.*
- *The North Suffolk Skills Centre will be retained on the site to be used for educational, voluntary and community purposes. This includes providing accommodation for local community organisations.*
- *Existing facilities at Dairy Hill, including the sports pitches, martial arts school, tennis courts, bowling green and children's play space, will be retained.*
- *Access to the residential development should be from Harrisons Lane.*
- *Existing trees and hedges on the site will be retained. There should be tree planting along the eastern edge of the site totalling 2.5 hectares to minimise landscape impact of the site.*
- *Development should be designed to encourage walking and cycling. Existing public rights of way on the site will be retained and new pedestrian access provided to include connectivity both within the site and with neighbouring parts of Halesworth. Loam Pit Lane should provide pedestrian and cycle access to the site.*
- *A Transport Assessment and Travel Plan should be submitted with any planning application.*
- *Any planning application is to be supported by 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.*

- A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application.
- 7.4. Policy requirements relevant to this application are considered in the report.
- 7.5. The indicative masterplan included in the Local Plan indicated the area adjacent to the Norwich Road that should be used for health facilities and retirement community. The proposed development is located in accordance with the indicative masterplan.
- 7.6. The Local Plan was adopted in March 2019 and sets the Council's development vision for the period up to 2036. The strategy for Halesworth and Holton is to increase the level of housing within the town which will help deliver enhanced health and sports facilities and new employment opportunities. Halesworth and Holton area is expected to deliver approximately 8% of the housing growth in the Waveney Local Plan area.
- 7.7. There have been questions raised in representation made in respect of the principle of redeveloping the playing field for this purpose alongside the Halesworth Campus sports proposals. However, the point to question this principle of redevelopment has passed with the adoption of the Local Plan, which involved extensive consultation and engagement with communities. The current approach to redevelopment of the middle school site was promoted through the Local Plan, it was consulted upon, examined in the Local Plan hearings and finally reviewed and found sound by a Planning Inspector. There is now no reason to deviate from the path set by the Local Plan.
- 7.8. Importantly a recent appeal decision in East Suffolk emphasises the important regard that must be had at planning application (and appeal stage) to the adoption of the Local Plan and its policies and allocations, this is quoted below and SCLP can be substituted for the WLP (Waveney Local Plan) in this instance:
- "16. Interested parties have raised a number of concerns about the procedures followed during adoption of the SCLP1 , claiming the plan and site allocation to be unsound for two key reasons. First, a late change was made to proposed sites and, second, non-provision to the examination of what is claimed to have been crucial information relating to tree works, the latter of which I return to later. However, the adoption of the SCLP has been through a robust examination process, which included detailed consideration of proposed sites. This was not formally challenged by any party at that time, and this s78 appeal is not the appropriate mechanism to do so now.*
- 17. Although I appreciate the concerns of residents, the SCLP is the development plan against which I am required by law to determine this appeal, unless material considerations indicate otherwise."*
- 7.9. The proposed development is considered to be a suitable location for a care home and extra care retirement apartments and, subject to matters of detail in respect of the apartments, would be compatible with the prevailing character of the surrounding area being predominantly residential in nature. The development would also seek to utilise an existing partly vacant brownfield site, which accords with paragraph 120 (c) of the NPPF which states that "planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land".

- 7.10. The former middle school and its playing fields were disposed of by the County Council and passed on to Halesworth Campus to enable sports and leisure redevelopment opportunities. Although the nature of the original plans has evolved over time including the removal of the Halesworth Community Sports and Leisure land (Dairy Hill, to the south of the site) and the addition of further land, the principle of the disposal of that County asset remains unchanged. It is not for this planning application to question the process of transfer of land to Halesworth Campus but it is clear that both Halesworth Campus and Castlemeadow Care have undertaken substantial investment to reach this planning application stage based on the confidence installed by the Local Plan process. It is also understood that the County Council maintains an important role in overseeing the development by holding funds from the sale of the land to Castlemeadow Care until Halesworth Campus have demonstrated that those funds are ready to be spent on new sports and leisure facilities.

Specialist Housing

- 7.11. The Local Plan acknowledges that the former Waveney area has an ageing population with a need for specialist housing. This is clearly represented in the Town Profile <https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Town-and-village-profiles/Halesworth-Town-Profile.pdf> This is evidently a town which does need to provide care facilities for the long term needs of an aging population.
- 7.12. Policy WLP4.1 does not specify the number of care beds, housing units, or the types of services and facilities that must be accommodated with the Heath Care Facility and Retirement Community. However, the Strategic Housing Market Assessment (2017) identified a potential need for 1,197 sheltered and extra care housing, and a need for 905 additional spaces in care/nursing homes over the plan period to 2036 within the Waveney Local Plan area. The proposed development provides an opportunity to deliver housing to meet this need.
- 7.13. A key finding of the Strategic Housing Market Assessment was the need for smaller units across the District in the form of 1 and 2 bedroom properties. As such Policy WLP8.1 requires 35% of new dwellings to be 1 or 2 bedroom properties. Whilst the extra care apartments are applied for in outline form the indicative proposals are for all 100 of them to be 1 bed, 2 bed or 2 bed with a study, which would be policy compliant if followed through to a reserved matters application. Such smaller units offer the opportunity for residents in the area to downsize which in turn can free up existing homes of larger sizes for other housing needs.

Affordable Housing

- 7.14. On sites of 11 dwellings or more Policy WLP8.2 requires that 30% of the units are provided as affordable housing unless it can be demonstrated that it is unviable to do so. The policy specifies that "sheltered and extra-care housing should be included as affordable units where needed and where practicable." There is no evidence that the demand for affordable housing is limited solely to none specialist forms of housing. Policy WLP8.2 clearly specifies that sheltered and extra-care housing should be included as affordable units where needed. It is therefore appropriate to apply the requirements of policy WLP8.2 to all types of dwellings (Specialist and none specialist) provided on site WLP4.1.

- 7.15. The planning application does not dispute that C2 uses are subject to affordable housing contributions. However, no affordable housing is proposed within the outline application for the extra care apartments. The submitted Planning Statement and Financial Viability Assessment both assert that it is not financially viable for the development to do so either on site or through a commuted sum payment.
- 7.16. The Financial Viability Assessment (FVA) has been subject to an independent assessment to verify the assumptions made. The independent assessment agrees with the outcome and conclusions of the FVA confirming that the proposed development of 100 extra care apartments does not support the delivery of affordable housing.
- 7.17. However, this issue needs to be considered in the context of other applications in Halesworth. There are currently two other planning applications that propose elderly persons accommodation (DC/21/4501/FUL at Dairy Farm, Saxons Way and DC/21/3016/FUL Land west of Norwich Road). Both these applications also assert that it is not viable to provide any affordable housing. Officers are seeking independent reviews of the FVA's for these applications and to ensure consistency this application will also be included in that review.
- 7.18. The current position is that it is not viable for this application to provide affordable housing based on the independent assessment received. Subject to there being no alternative outcome from the second stage of assessment this this application is to receive, it is accepted that this proposal will not be providing any affordable housing.

C2 Use Class

- 7.19. The application states that the whole development falls within Use Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). C2 Residential Institutions provide residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses) or within a hospital, nursing home or residential school. It is clear from this that the proposed care home would fall within Class C2.
- 7.20. With regards to the extra care apartments case law has established that a Class C2 development could include accommodation in the form of dwellings, including flats/apartments, each of which had facilities appropriate for private, or independent, domestic existence, although their use would only fall within the Class C2 use if "care" were provided for an occupant in each dwelling who was "in need of care" as defined in Article 2 of the Use Classes Order. Case law also established that the accommodation must be capable of being described as a residential institution, which would include, for example, an "organisation" managing the development in order to ensure that the needs of residential occupants for "care" are delivered.
- 7.21. A C2 status does not necessarily define Extra Care housing and there are examples of C3 (dwelling houses) still being defined as Extra Care and subject to very similar restrictions and levels of care. In this instance the main difference between a C2 and C3 use is effect of Community Infrastructure Levy on the development. C3 uses are liable to pay this, C2 uses are not liable. Therefore C2 uses must be mitigated in their infrastructure effects through conditions and section 106 obligations where necessary.

- 7.22. Castlemeadow Care is an established local care organisation. The development will have staff on site 24/7 and care provision would be registered with the CQC. The minimum age for occupants of the extra care apartments is proposed to be 65 and they will have been assessed as in need of care. Occupiers would also be required to purchase a minimum care package. There would be outdoor communal space and communal facilities within each proposed apartment block, including restaurant, cafe, lounges, hair salon and convenience store as set out in the accommodation schedule within the Design and Access Statement. Although the apartments are applied for in outline form it is considered that a condition could require the accommodation schedule to be reflected in any reserved matters application. Subject to care obligations and occupation restrictions, which can be secured by S106 Agreement, it is agreed that the use of the site would fall within Class C2.

Highway Considerations

- 7.23. The primary vehicular access to the care home and apartment block A will be from Norwich Road. A secondary vehicular access to the care home and apartment block B will be from Bungay Road. The Highway Authority have confirmed that both accesses are acceptable.
- 7.24. The site is sustainably located within Halesworth. Policy WLP4.1 states that the Halesworth/Holton Healthy Neighbourhood should be designed to encourage walking and cycling. Existing public rights of way on the site will be retained and new pedestrian access provided to include connectivity both within the site and with neighbouring parts of Halesworth
- 7.25. Local Plan Policy WLP8.21- Sustainable Transport, says that development proposals should be designed to encourage people to travel using non-car modes to access home, school, employment, services and facilities and that developments should connect into the existing pedestrian and cycle network.
- 7.26. The new access from Bungay Road will connect to the existing shared footway on Norwich Road and the existing pedestrian route from Bungay Road along the southern edge of the site will be improved in width in order to provide a site wide sustainable link from Norwich Road and Bungay Road and connection into the adjacent Halesworth Campus site. Norwich Road provides direct pedestrian access to the services and facilities within Halesworth town centre and Bungay Road to the train station.
- 7.27. There should also be good pedestrian connectivity within the site particularly as the Cutlers Hill surgery is located a short distance to the south. It is considered unacceptable if the proposal did not provide a direct route pedestrian route to it, otherwise there would be a less convenient circuitous route for patients needing to access the facility, and indeed for G.P's needing to visit patients. It would be a lost opportunity not to provide this link which will improve the connectivity of the site. It will be noted that Suffolk County Council Public Rights of Way Team support the proposal subject to the provision of a link to Public Footpath 17 at Dairy Hill to connect the development to the Doctors Surgery, Public Footpath 17 then connects with Halesworth Public Footpath 7. In addition the sports land will connect with the new route, through to the northern part of Footpath 7) Loam Pit Lane, into the Harrisons Lane housing development and onwards into the open space of the Hill Farm Road (Hopkins) development.The result will allow for off-road circular walks

and enhanced east-west connectivity (including across to Holton) avoiding the use of any roads, thereby providing good connectivity to the surrounding network as required by Policy WLP8.21.

- 7.28. Ensuring this application provides a pedestrian link to the Cutlers Hill Surgery can be secured through a S106 contribution. Because the new Public Right of Way will involve third party land, specifically the edges of the football pitches owned by the Halesworth Community Sports and Leisure (HCSL) charity, the creation of this route will involve either a Public Right of Way Creation Agreement or Creation Order. Hopefully the former of the two process could progress through collaborative working with HCSL if that isn't possible the funding would also cover a order making process. The funding request also includes the cost of repositioning of fencing.
- 7.29. A total of 19 parking spaces are proposed for staff associated with the care home and 18 spaces for visitors and 5 covered cycle parking spaces for staff and visitors. Although parking for the apartments and staff accommodation would be subject to a future reserved matters application the Masterplan of the site and parameter plans provide reassurance that an adequate amount of parking could be achieved.
- 7.30. Policy WLP8.21 - Sustainable Transport, states that development will be supported where it includes facilities for charging plug-in and other ultra-low emission vehicles. It is considered that a development of this scale should make provision for electric vehicle charging which can be the subject of a condition in the event that the application is approved.
- 7.31. The submitted Transport Assessment concludes that the impact of the proposed development on the operation of the local highway network has been assessed using modelling software which demonstrates that the traffic flows associated with the proposed development will be satisfactorily accommodated on the local highway network without resulting in any severe impacts on the free-flow of traffic.
- 7.32. Having regard to highway matters, it is considered that the proposed development would be well located and designed to encourage people to travel using non-car modes. There is no objection from the Highway Authority the proposal would accord with the expectations of WLP4.1 and WLP8.21 and would be both sustainable and safe.

Design

- 7.33. Policy WLP8.29 sets down design criteria for development proposals. In particular they will be expected to demonstrate high quality design and respond to local context and the form of surrounding buildings in relation to the overall scale and character. Proposals should also protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development. Due to the scale and prominence of the development detailed pre-application engagement took place and this included consideration and contributions from the Principal Design and Conservation Officer which helped to shape the submitted scheme.
- 7.34. The development is proposed to be generally 2 to 3 storeys across the site. The frontage to Norwich Road is 2.5 to 3 storeys with feature buildings at the entrance and fronting the

central plaza. Apartments are double aspect and accessed from communal semi-enclosed walkways to provide good levels of natural light and ventilation.

- 7.35. As noted above the proposed care home (Block C) primarily consists of three separate wings or 'houses' containing the bedrooms which radiate off a central spine. The adjacent flat roofed building accommodates the restaurant with a frontage to shared external space. The care home is orientated east-west to create a frontage onto the new road from Norwich Road and Block B, linking the home with the Extra Care apartments and the public realm within the site. The central 'street' running through the spine of the home provides access to communal and care facilities, while bedrooms are located within the 3 wings on a more typically domestic scale with predominantly pitched, plain tiled roofs and red facing brickwork.
- 7.36. The resident's bedrooms have been arranged with two goals in mind: to improve infection control and to promote a domestic character within the development. Within each 'house' 9 bedrooms per floor (18 per house) are proposed. This arrangement allows for each cluster of 9 bedrooms to be locked down independently in an infection scenario. Each house will have their own house lobby which will serve as a "front door" giving houses their own identity.
- 7.37. The aim has been to create an environment that is both stimulating and safe for residents and this is achieved through a design that is considered to be both interesting and contemporary. In terms of residents amenity, on the ground floor residents will have access to an attractively landscaped south facing courtyard a small woodland area which provides a pleasant outlook from bedrooms. At first floor level there are outdoor terraces on both the east and south elevations providing outdoor space for the residents.
- 7.38. The care home is set back from the road frontage well away from any residential properties along Norwich Road and Bungay Road Norwich Road frontage such that it will not have any adverse impact on these properties. It is considered that the design and appearance of the proposed care home is well thought out and will result in pleasant living environment for the residents and in this respect is considered to accord with Policy WLP8.29.
- 7.39. The proposed extra care apartments are applied for in outline form with all matters reserved for future determination and will therefore be subject to a future reserved matters application. However, the principle of development is established through the site allocation (Policy WLP4.1). On this basis the applicant has submitted development parameters and principles of design within a revised Design and Access Statement in order to fix certain aspects to guide any future reserved matters application and ensure a high quality design, should outline consent be granted.
- 7.40. The submitted parameter plans are:
 - Movement and Access Parameter Plan
 - Mass and Scale Parameter Plan
 - Sustainable Drainage Parameter Plan
 - Landscape and Character Parameter Plan
 - Landscape and Character - Public Realm Parameter Plan
 - Landscape and Character - Semi-Private Spaces Parameter Plan

- Use Parameter Plan

- 7.41. An important consideration of this application will be ensuring there is good pedestrian and cycle connectivity to the adjacent sites and in this regard the Movement and Access Parameter Plan is a key plan. It shows the main and secondary access from Norwich Road and Bungay Road respectively and the layout of the internal access roads. Importantly it shows the existing pedestrian/cycle footpath along the southern boundary increased to 3m in width and linking into the adjacent proposed sports pitches site thereby providing good direct access to them. The plan also shows the pedestrian link to the Cutlers Hill surgery which, as mentioned above is considered essential to secure by the S106 Agreement.
- 7.42. An equally important consideration is the appearance of the proposed apartments particularly in view of the concerns expressed by local residents and the Town Council that they are not in keeping with the character with the area due to their height and overall scale. The Mass and Scale Parameter Plan, and indeed the proposed Master Plan, fixes in some detail the area and extent of development and the associated massing and scale. Building height has been carefully considered in response to the varied but predominantly 1 and 2 storey properties along Norwich Road. As noted above the frontage to Norwich Road is 2.5 to 3 storeys with a feature building at the entrance. Along the Norwich Road frontage the apartments are characterised by 2.5 storey gables with the 3 storey apartments set back from the main elevation. Much of the main elevation closest to Norwich Road comprises 2 storey apartments with balconies.
- 7.43. Officers have given detailed consideration to the scale and appearance of the apartments and the concerns of residents and the Town Council. Whilst these concerns are acknowledged officers are of the view that in principle it is appropriate to locate the apartments within this predominantly urban environment within the settlement limits of the town, and that within this urban context the Mass and Scale parameters will ensure that the apartments will not appear inappropriately located or out of keeping with the character of the surroundings. Furthermore, the interest and variety in the elevation to Norwich Road that is achieved through the use of gables, set backs, building height and variety of materials will help to break up the overall appearance of scale and massing of the apartments.
- 7.44. The level of detail set down in the Mass and Scale Parameter Plan and the Masterplan fixes in quite a specific way how the apartments have been designed which in turn will reduce the level of flexibility that will be able to be applied to any reserved matters application. Nevertheless, the applicant has expressed a willingness to proceed on this basis which provides confidence to officers that high quality design will be achieved in any future reserved matters application.
- 7.45. One of the main features of the Landscape and Character Parameter Plans is the communal pedestrianised plaza linking the care home, the Extra Care apartments and the shared communal facilities and defined by architectural design and hard and soft landscaping. As such the communal facilities will provide active frontages to the plaza. The aim to connect the buildings and create places for people to meet and sit outdoors is welcomed. Full details of the treatment of the plaza space can be secured by condition although the parameter plan indicates this will be an attractive and welcoming space for both residents and visitors alike.

- 7.46. A courtyard garden is situated in the centre of each apartment block providing outdoor amenity space. Each apartment would have either a small garden or balcony and there would be a further landscaped area of external amenity space to the north of block A which would also provide a buffer and privacy to the 2 adjacent residential properties. Full details of landscaping can be secured by condition. Within the context of an extra care development the amount of private and communal amenity space is considered acceptable.
- 7.47. Similarly, the landscape masterplan for the care home indicates attractive external space including footpaths, areas of seating, water features and raised planters.
- 7.48. Having considered the parameter plans for landscaping and sustainable drainage officers are satisfied that they set appropriate parameters for the site to guide detailed reserved matters proposals.
- 7.49. Lastly the Use Parameter Plan fixes areas of built development and therefore provides a level of confidence that the development can be accommodated satisfactorily within the site and be reflected in reserved matters proposals.

Heritage Considerations

- 7.50. The application is supported by a Heritage Impact Assessment. The Grade II listed Wisset House is located at the junction of Old Station Road and Norwich Road, some 50m north of the northern boundary of the site. Town Farm, also Grade II listed, is located to the east of the adjacent sports pitch application.
- 7.51. With regards to Wisset Place, officers agree with the conclusions of the HIA that although the proposed development will increase the existing suburban character surrounding Wisset Place, this will still be seen within the context of existing development and will have no impact on how the significance of the listed building is appreciated or understood. Similarly, owing to the orientation of Town Farmhouse and intervening vegetation screening, the visibility of the proposed development is considered to be negligible. The proposal will be seen within the context of existing suburban development on Norwich Road. As such it is considered that there will be no impact on the understanding or appreciating the significance of Town Farmhouse. As the proposed development does not have any impact on designated heritage assets, paragraph 202 of the NPPF is not engaged.

Drainage and Flooding

- 7.52. Policy WLP8.24 - Flood Risk, states, inter alia, that developments should use sustainable drainage systems to drain surface water. Sustainable drainage systems should be integrated into the landscaping scheme and the green infrastructure provision of the development and not detract from the design quality of the scheme. They should deliver water quality and aquatic biodiversity improvements wherever possible.
- 7.53. The site lies within Flood Zone 1 which has the lowest probability of a flood risk event occurring (less than 1 in 1000 annual probability). The submitted Flood Risk Assessment states that the surface water drainage strategy for the site has been developed using Sustainable Drainage System (SuDS) techniques.

- 7.54. The overall philosophy of SuDS is to replicate, as closely as possible, the natural drainage process of a site prior to development to mitigate the adverse effects of urban storm water runoff on the environment. SuDS provide the ability to manage surface water discharge rates and volumes but also improve water quality, ecology and amenity within the development.
- 7.55. It is proposed that the surface water will be stored and discharged at existing present-day greenfield runoff rate, whilst making an allowance for climate change. The drainage strategy will result in a reduction in peak runoff rates discharging from the site.
- 7.56. The Surface Water Drainage Strategy for the proposed development consists of:
- Permeable surfacing within car parking bays and the central plaza;
 - Rain gardens adjacent to car parking bays and within the central plaza;
 - Geocellular crate storage underneath the central plaza and unadopted highways;
 - A swale in the south of the site.
- 7.57. A series of pipes would then direct surface water to the existing ditch along the southern boundary of the site which the applicant has confirmed falls within their control. At the western end this ditch connects into the wider piped network in Bungay Road and Norwich Road. Anglian Water have indicated that a surface water connection into the sewer in Norwich Road would be acceptable
- 7.58. The proposed surface water drainage strategy has been scrutinised by Suffolk County Council as the Lead Local Flood Authority (LLFA) who recommend approval subject to conditions for both detailed element (care home) and outline elements (apartments) of the application.
- 7.59. It is therefore considered that the proposed surface water drainage strategy is generally in accordance with Policy WLP8.24 and can be supported, subject to conditions recommended by the LLFA.

Ecology and Biodiversity

- 7.60. Policy WLP8.34 - Biodiversity, sets out the approach to protecting and enhancing biodiversity within the former Waveney area of East Suffolk Council. The policy seeks to protect species and natural features found on sites and encourages the provision of features within developments which can support biodiversity and ecological networks. Such features could include roosting or nesting spots on trees and buildings for birds and bats, features which enable permeability for hedgehogs and water features such as ponds.
- 7.61. As described in the submitted Ecological Impact Assessment (EIA), the site comprises predominantly managed amenity grass and hardstanding, with some ornamental scrub, plus native scrub and tree lined boundaries. The overall value of the site to wildlife is considered to be Lower at the Parish scale.
- 7.62. The site, and immediate surrounding areas, have been subject to numerous surveys by The Landscape Partnership and others since 2016, covering both the current site proposed for the Care Home campus and adjoining areas of land to the east and the south. All available data have been used to inform the EIA.

- 7.63. Great crested newt is known to be present within the wider Halesworth area in low numbers however pond surveys have returned negative results for great crested newt within ponds closest to the development site.
- 7.64. Small populations of slow worm and common lizard have been recorded as present southeast of the site, in particular within the south-facing embankment at the northern end of the Dairy Hill sports pitches.
- 7.65. The site is likely to be used by common breeding bird species, both for nesting and foraging, with the scrub, tree and hedgerow habitats being of greatest value in this respect, although the EclA considers the value of the site to breeding birds to be low.
- 7.66. With regards to bats, a number of trees along the western boundary are proposed for removal, coppicing or crown lifting as detailed within the Tree Impact Assessment accompanying the application. The majority of trees affected are small and immature and hence very unlikely to support features with the potential to be used by roosting bats. One early mature copper beech will be removed to allow construction of the Norwich Road access. This has been assessed as being generally too young to support features within its structure likely to be used by roosting bats. Similarly a white poplar that would be removed to form the entrance off Bungay Road has been assessed as too young to be used by roosting bats.
- 7.67. The Council's Ecologist has considered the EclA and concurs with its conclusions. Subject to conditions to secure the ecological avoidance, mitigation, compensation and enhancement measures identified in the EIA and conditions to protect active birds nests and reptiles respectively, it can be concluded that the proposal will not have an adverse effect on wildlife and that the proposal will be compliant with Policy WLP8.24.
- 7.68. Trees that are proposed to be retained can be protected in accordance with the measures set down in the Tree Constraints, Tree Impact Assessment and Tree Protection Method Statement. The Councils Principal Landscape and Arboriculture Officer raises no objection to the application subject to additional landscaping in accordance with the Landscape masterplan and parameter plan which can be secured by condition. As the site is within the settlement boundary for Halesworth it is not considered that there will be any impact on wider rural landscape character.

Habitats Regulations Assessment (HRA)

- 7.69. Based on the development type and proximity to European designated sites, the Council, as the competent authority, has to make a judgement as to whether the development constitutes a 'likely significant effect' (LSE) to a European site in terms of increased recreational disturbance.
- 7.70. The application site is within 13km of the Minsmere-Walberswick SPA; the Minsmere-Walberswick Ramsar Site; the Minsmere-Walberswick Heaths and Marshes SAC and the Benacre to Easton Bavents SPA.
- 7.71. Evidence collected as part of the preparation of the Suffolk Coast Recreation Disturbance and Mitigation Strategy (RAMS) has identified that all new residential type development in the district is contributing to an in-combination increase in recreational disturbance

impacts at European designated sites. Overall, this increase in recreational pressure is at risk of creating an adverse effect on the integrity of these sites. All new residential type developments are therefore required to deliver mitigation measures to address this impact, including by contributing to the strategic mitigation package which is being delivered as part of the Suffolk Coast RAMS.

- 7.72. Whilst it is not considered that the care home element of the proposal will give rise to increased recreational pressure on the identified European designated sites (due to the type of residents which will occupy it), the LPA considers that it cannot satisfactorily concluded that the extra care apartments element of the proposal will not give rise to increased recreational pressure on the identified sites (in combination with other residential type developments). This is because, whilst occupancy of the development does require the residents to be receiving some level of care, at the lower levels required to qualify it is not considered that this will be such that it precludes residents from undertaking recreational activities at European designated sites. Mitigation measures to address this must therefore be secured as part of this application.
- 7.73. In undertaking an appropriate assessment of the proposal, it is considered that the following mitigation measures are necessary:
 - Provision of onsite open space, including formal garden areas and surfaced footpaths;
 - Connections to existing public rights of way (including Footpath 7), allowing for local circular walks; and
 - A financial contribution to the Suffolk Coast RAMS
- 7.74. Natural England have been consulted and have confirmed that they agree the above measures are necessary to mitigate the impact of the development on European sites. Subject to these, which can be secured through a section 106 agreement, it can be concluded that the project will not have an Adverse Effect on the Integrity of the European sites included within the Suffolk Coast RAMS.

Noise

- 7.75. Policy WLP8.29 states, inter alia, that developments should protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development.
- 7.76. The proposed apartment blocks will contain communal facilities on the ground floor including cafes, restaurants and bars that are likely to have extract ventilation and which can potentially be noisy and disturbing for occupiers of the proposed homes. The Environmental Protection Officer has recommended that the living accommodation should be protected from these potential noise sources and this can be secured by condition prior to commencement of any development.
- 7.77. Furthermore some of the units in apartment Block A will overlook the grass pitch. The acoustic report submitted for the adjacent sports pitch application states that, in addition to an acoustic barrier, the windows of this application that overlook the pitch will be designed to take into account noise associated with the use of the pitch. The

Environmental Protection Officer has advised that the details of these windows need to be agreed and this can be secured by the aforementioned condition.

- 7.78. The revised masterplan for the site indicates a 3m high acoustic fence along the boundary between apartment Block A and the grass pitch which is considered both appropriate and necessary. Full details of the acoustic fence can be secured by condition and installation and long term maintenance of this fence should be the responsibility of the care developer rather than the sports pitch provider.
- 7.79. It is considered that potential noise sources associated with the proposed development or noise from the adjacent sports pitch affecting the proposed development, can be mitigated by conditions as advised by the EPO, to ensure that the occupiers of the proposed living accommodation are not unduly disturbed.
- 7.80. Further consideration of the proposed acoustic fencing for the sports pitches is given in the report for application DC/21/0007/FUL.

Sustainable Construction

- 7.81. Policy WLP8.28 - Sustainable Construction states, inter alia, that proposals for major residential and commercial developments should demonstrate, where practical, that they have incorporated energy efficiency measures and renewable and low carbon energy generation and should achieve water efficiency of 110 litres/person/day. This is reflected in the NPPF paragraphs 155 and 156 which promote the use of renewable or low carbon energy when considering planning applications.
- 7.82. An Energy Strategy Report has been submitted which states:
The energy strategy for the development proposals has, at its core, the reduction of energy use through effective fabric energy efficiency measures and efficient services solutions. This report follows the strategy of 'Be Lean', 'Be Clean', 'Be Green'. The strategic approach to the design of the Proposed Development has been to reduce the need for energy prior to the consideration of integrating Low or Zero Carbon (LZC) technologies, since controlling demand is the most effective way of reducing energy consumption and CO2 emissions.
- 7.83. The overall recommendation is that a gas led system providing heating and hot water services with an array of air source heat pumps (ASHP) providing heating and cooling to high occupancy areas complimented by an array of photo-voltaic panels is the most viable and practical option of providing 10% site wide energy from LZCT.
- 7.84. A number of passive design and energy efficiency measures would be incorporated, including minimising the ratio of glass to external walls in north facing elevations, optimising solar gain and use of thermal insulation to reduce the demand for heating.
- 7.85. The report acknowledges that in the absence of a fully developed design the assessments are based on preliminary information and is intended to outline the feasibility of incorporating LZC technologies. Nevertheless it is considered that the report provides sufficient reassurance of a strong commitment to high levels of sustainable development as required by Policy WLP8.28. In particular photovoltaics are identified as being appropriate for installation. Notwithstanding this it is considered that further details of

photovoltaic provision and water efficiency measures (to meet 110 litres/person/day) are required and can be secured by condition.

Loss of part of playing field and continuity of sports facilities

- 7.86. This application relates to the partial loss of the Halesworth Middle School playing fields which have been maintained to an extent since the closure of the middle school and used mostly in recent years for midweek training by Southwold Rugby Club, who use portable floodlights during the winter months. Irrespective of the level of recent use, the quantum of pitch space on the site is relevant to considerations in respect of the loss of this asset and its replacement. For this reason, there has been close engagement through the application process with Sports England, the Rugby Football Union (RFU) and the Suffolk branch of the Football Association (FA). At the same time as this, the Council has been working with consultants to produce an up-to-date East Suffolk Leisure Strategy, which has comprehensively considered all sports and leisure facilities and needs across the district, including engagement with clubs, organisations and communities. That has not yet been published but the consultants have also been involved in relevant sports meetings related to this application and have factored proposals into their work. It may be possible to provide extracts of that work in the update sheet.
- 7.87. Sport England are a statutory consultee who have considered the application in light of the National Planning Policy Framework (in particular Para. 97), and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

- 7.88. Sport England have considered the application against exception 4 of their policy, which states:

'The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.'

- 7.89. Sport England have assessed the application to determine whether the proposals meet exception 4. Sport England have commented as follows:

The playing fields have been used in recent years for midweek training by Southwold Rugby Club, who use portable floodlights during the winter months.

The playing field measures approximately 2.8 hectares, of which 0.89 hectares will be retained, resulting in a loss of approximately 1.9 hectares. To compensate for this loss, a new playing field of approximately 2.4 hectares will be provided on agricultural land adjacent to the existing playing fields to the south (as proposed by application DC/21/0007/FUL).

From a qualitative perspective, the new facilities will offer improved quality facilities, compared to the existing playing fields, with the potential for local football clubs and Southwold Rugby Club to access the new 3G facility for matches and training. There is also local demand for new tennis and netball facilities.

The new facilities will be managed by Sentinel Leisure on behalf of the trust, bringing local expertise and experience to this requirement.

From a locational perspective, the new facilities meet this requirement as they are in close proximity to the playing field to be lost, and will result in a new sports hub to serve local clubs and local people who wish to participate in a more informal way.

The new 3G facility will be provided prior to the loss of part of the existing playing field, which will allow Southwold Rugby Club to continue using the existing playing field for the next two years, until the 3G pitch is complete and ready for use. The rugby club have raised some issues with regard to how their interests will be met, which have been raised on the application for the new sports facilities.

It is considered that, on balance, the loss of part of the playing field can be justified under exception 4 of our playing fields policy, and conditions will need to be imposed on planning application ref: DC/21/0007/FUL to ensure the new facilities satisfy exception 4 with regards to quantity, quality, management arrangements etc.

- 7.90. In view of the above Sport England do not object to this application subject to a condition that the replacement playing field being provided by application DC/21/0007/FUL is provided prior to the loss of part of the playing field associated with this development.
- 7.91. As Sport England recognise the existing playing field will continue to remain available for use whilst the 3G pitch is being completed and whilst the care home is being constructed. The care home affects only a relatively small part of the playing field (although the access road does bisect it) and will be built before the apartment blocks A and B as these are subject to a future reserved matters application. In order to ensure existing users of the field are able to continue using it whilst the 3G pitch is being completed, the applicant has agreed to provide a licence to Halesworth Campus to allow the site of apartment block A to continue being used for playing pitches for a minimum of 12 months. In addition to the licence, the phasing conditions imposed on this consent can control any works taking place on the Block B area until alternative pitch provision has been made available.
- 7.92. A phasing plan for the site has also been submitted which shows the sequence of development across the site as follows:

- Phase 1 – Install new boundary fence adjacent to access road off Norwich Road to secure site. Existing football pitch to north to remain operational until completion of care home; establish building contractors site offices; form new site access from Norwich Road and Bungay Road and form all access roads within phase boundary; internal access roads; install all below ground water attenuation crates, swale and connection to existing ditch to south west corner of the site; construct care home and complete associate hard and soft landscaping; widen existing cycle/footpath along southern boundary, extending to south east to connect to adjacent Campus development.
- Phase 2 – Decommission existing football pitch and erect new boundary fences to secure construction site; form access roads; construct extra care apartments and amenity facilities within Block A.
- Phase 3 – Decommission/reconfigure contractors site welfare/compound; construct extra care apartments and amenity facilities within Block B; complete hard and soft landscaping.
- Phase 4 – Establish contractors site welfare/compound; construct Block D; complete associated hard and soft landscaping.

7.93. In addition to this the Planning Statement for the sports pitch application states:

There is currently the equivalent of a full-sized pitch marked out to the north of the site to support training use.

There are fixed rugby posts in place and portable football goals available to support the training sessions. This use can continue during the construction period of the 3G pitch and due to the timeline development of the assisted living/extracare apartments there will not need to be any changes until the 3G is ready for use.

However, should the grass pitch on site not be available for any reason, the training ground can be relocated over to the Eastern field behind the Skills centre. An Agronomist Report has been carried out (and included in this planning submission). The report recommendations would be implemented to bring the field up to standard, should it be required, and the field transformed into a temporary pitch.

7.94. The use of land behind the Skills centre is undesirable and is not factored into the current funding approach to delivery of the 3G pitch and enhanced grass pitch. Based on the approach to phasing the use of that area should not be necessary. That area remains open to redevelopment based on the allocation and it may be necessary to secure value from that land for later phases of sports development. The phasing plan ensures that the existing pitch will remain in operation during the construction of the care home (Phase 1) and can be the subject of an appropriately worded condition. In addition, it is considered necessary impose a condition that prevents any construction of the extra living apartments until the new grass pitch has been completed. This enables control to be retained over the timing of the provision of the new grass pitch.

- 7.95. Subject to appropriately worded conditions being applied to both this application and DC/21/0007/FUL it is considered that there are sufficient controls in place to ensure the proposals satisfy exception 4 of Sport England's playing fields policy.

Primary Healthcare considerations/Community Infrastructure Levy

- 7.96. Developments which fall within Use Class C2 (Residential Institutions) are not subject to the Community Infrastructure Levy whereas general housing is. The Infrastructure and Delivery Framework (IDF) contained in the Local Plan sets out in detail all of the infrastructure required to support the housing growth during the plan period. Within Halesworth the Health requirements have been identified as 94 sqm of clinical floorspace with an approximate cost of £207,776 to be funded through the Community Infrastructure Levy.
- 7.97. The Norfolk and Waveney Clinical Commissioning Group has advised that the proposal will include people with increased health and care needs that would place further demand on the general medical services operating from Cutlers Hill Surgery which at present has no additional registration capacity and already has more patients than would be expected for the size of their premises. Therefore, the proposal would give rise to a need for improvements to capacity within primary care by way of extension and internal development of the practice.
- 7.98. As the health requirements within the IDF are reflective of housing growth they do not capture the increased health needs from this application. It was not clear at Local Plan stage whether the extra care development would be C3 (CIL generating) development or C2 (reliant on s106 funding). Therefore, an additional developer contribution will be likely in order to mitigate the impact of the development, and to support the extension and improvements to Cutlers Hill Surgery.
- 7.99. Further discussions with the CCG are ongoing establish the additional developer contribution required to mitigate the impact of this (and other) development. This involves assessing a number of funding scenarios due to the planned and unplanned developments currently under consideration. Any contribution will be secured in a Section 106 agreement. East Suffolk CIL and S106 officers have emphasized in meetings with the CCG that if the Doctors Surgery and CCG can present a deliverable surgery expansion project then it would be at the top of the list in priorities for CIL funding based on the IDF/IFS and the CIL Spending Strategy.

Public Benefits of the Proposed Development

- 7.100. The proposed development will deliver a number of public benefits including:

- A 54 bed care home and 100 extra living apartments in a sustainable location as part of the plan-led approach to growth in Halesworth;
- Enabling the provision of improved sporting facilities within the town;
- Creation of a new footpath providing a direct link from the development to Cutlers Hill Surgery;
- Economic benefit in the short-to-medium term through creation of jobs in the construction industry;

- Long term benefit to facilities/services in Halesworth from new resident spend in the economy;
- Cycle/footway links to adjoining sites;
- Footway improvements along Bungay Road.

8. Conclusion

- 8.1. The proposal is acceptable in principle as the site is allocated for development by local plan Policy WLP4.1. The development is therefore sustainably located and will deliver the health care and retirement community aspects of the policy and by doing so will help enable the first phase of improved sporting facilities for Halesworth also proposed by WLP4.1. This is a significant benefit of the scheme along with the other benefits as set out above. The proposal therefore accords with the plan-led approach to growth in the Halesworth area.
- 8.2. This hybrid application consists of two main elements. There is the full application for the care home and the outline application for the extra living apartments. The design and appearance of the care home is considered acceptable and can be accommodated on the site satisfactorily without detriment to the amenities of nearby properties.
- 8.3. The outline application for the apartments is supported by design parameters that will fix certain elements of the design approach in order to guide any future reserved matters applications. Officers are confident that the design parameters provide an assurance that it is possible to accommodate this number of units on the site in a manner that respects the urban context of the site and its surroundings as required by Policy WLP8.29.
- 8.4. It is acknowledged that the proposal will result in a considerable change to the existing character and appearance of the site and that it is not supported by some local residents and the Town Council. The concerns raised have been given due consideration by officers but do not, in the balance, indicate that planning permission be refused. Many of the matters raised can be addressed either through appropriate planning conditions or proper consideration of detailed design at reserved matters stage. Many representations raised run contrary to established principles for the redevelopment of the site established in the Local Plan.
- 8.5. The proposal is considered to represent sustainable development in accordance with the objectives of the National Planning Policy Framework (2021) and the Development Plan as a whole. There are no significant, or unacceptable environmental impacts arising from the proposals. There are also substantial public benefits that would otherwise justify approval as detailed above. No material considerations have presented themselves in the process of the determination of this application which would cause the need for a decision contrary to Development Plan and the allocation policy underpinning this development.

9. Recommendation

- 9.1. Authority to APPROVE with the conditions set out below and subject to the completion of a S106 Legal Agreement within six months to secure the following obligations:

- Standard care package including minimum personal care requirements (primary residents of the assisted living units).
- A financial contribution towards primary healthcare expansion, the amount to be confirmed by Norfolk and Waveney CCG
- Public Right of Way creation funding for a footpath link to Cutlers Hill Surgery
- Per extra living unit contribution to the Suffolk RAMS
- licence to Halesworth Campus to allow the site of apartment block A to continue being used for playing pitches for a minimum of 12 months.

9.2 If the S106 is not completed within 6 months authority to REFUSE the application.

9.3 Conditions:

1. The development hereby permitted through the full application shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. In respect of the outline planning permission hereby approved approval of the details of the siting, design and external appearance of the buildings, and the landscaping of the site (hereinafter called "the reserved matters") and measures to minimise water and energy consumption shall be obtained from the local planning authority in writing before any development is commenced. Development shall be carried out as approved.

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

3. The development subject of the outline planning permission hereby approved shall be begun within the time limits specified in Condition 4 and is subject to any conditions imposed thereon.

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

4. a) Application for approval of any reserved matters must be made within three years of the date of this outline permission and then
b) The development hereby permitted must be begun within either three years from the date of this outline permission or within two years from the final approval of the reserved matters, whichever is the later date.

Reason: To comply with section 92 of the Town and Country Planning Act 1990.

5. The submission of reserved matters applications pursuant to the outline application shall demonstrate substantial compliance with the Movement and Access Parameter Plan (Drwg. No. 9363 - FM - ZZ - 00 - DR - A - 1010); Mass and Scale Parameter Plan (Drwg. No. 9363 - FM - ZZ - 00 - DR - A - 1011); Landscape and Character Parameter Plan (Drwg. No. 9363 - FM - ZZ - 00 - DR - A - 1013); Landscape and Character Parameter Plan - Public Realm (Drwg. No. 9363 - FM - ZZ - 00 - DR - A - 1014); Landscape and Character Parameter Plan - Semi-Private

Spaces (Drwg. No. 9363 - FM - ZZ - 00 - DR - A - 1015) and Use Parameter Plan (Drwg. No. 9363 - FM - ZZ - 00 - DR - A - 1016) contained within the Design and Access Statement (Ref. 9363 / 0001 / P02) received 16 August 2021.

Reason: In order to secure high-quality design it is essential to establish development parameters to guide future reserved matters application, in accordance with the design and objectives of Local Plan policy WLP8.29 (Design).

6. Pursuant to the Use Parameter plan (Drwg. No. 9363 - FM - ZZ - 00 - DR - A - 1016) the submission of reserved matters applications shall demonstrate substantial compliance with the Accommodation Schedule set down in Table 1 of the Design and Access Statement (Ref. 9363 / 0001 / P02) received 16 August 2021.

Reason: For the avoidance of doubt and to ensure the inclusion of communal facilities within reserved matters submissions.

7. Prior to the first operation of the care home the existing pedestrian / cycle footpath along the southern boundary of the site shall be increased to 3m wide up to the boundary of the adjacent Halesworth Campus site (application DC/21/0007/FUL) as shown on the Movement and Access Parameter Plan; in accordance with details previously agreed in writing by the local planning authority.

Reason: Connectivity between the site and the adjacent site is a critical element of Policy WLP4.1 Halesworth/Holton Healthy Neighbourhood. In order to ensure the delivery of this pedestrian connection the route must be improved at an early stage of the development.

8. The development shall be carried out generally in accordance with the Proposed Masterplans (Drwg. Nos. 9363-FM-ZZ-00-DR-A-1001-04 and 9363-FM-ZZ-00-DR-A-1000-08 received 16 August 2021.

Reason: To secure a properly planned development.

9. The development hereby permitted shall be completed in all respects strictly in accordance with the following plans received on 19 January 2021 (unless stated otherwise), for which permission is hereby granted or which are subsequently submitted to and approved by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

9363-FM-ZZ-00-DR-A-0110-01 - Existing Site Plan, received 16 August 2021;
9363-FM-CH-GF-DR-A-2000-P05 - Ground Floor Layout;
9363-FM-CH-01-DR-A-2001-P05 - First Floor Layout;
9363-FM-CH-02-DR-A-2002-P01 - Second Floor (Attic) Layout;
9363-FM-CH-RF-DR-A-2003-P01 - Roof Plan;
9363-FM-CH-ZZ-DR-A-1300-P01 - Sections - Sheet 1;
9363-FM-CH-ZZ-DR-A-1301-P01 - Sections - Sheet 2;
9363-FM-CH-ZZ-DR-A-1400-P02 - West and East Elevations;
9363-FM-CH-ZZ-DR-A-1401-P01 - Typical House Elevations;
9363-FM-CH-ZZ-DR-A-1402-P01 - South Elevations;

9363-FM-CH-ZZ-DR-A-1403-P01 - North Elevations;
9363-FM-CH-ZZ-DR-A-1404-P01 - Northern Courtyard Elevations;
HALSTRP-Nov20 Tree Retention and Protection Plan, received 5 January 2021
HALESRPA-Nov20 Root Protection Areas Plan, received 5 January 2021 and
JN1082-Dwg-0016D and JN1082-Dwg-0019B, received 15 December 2021

Reason: To secure a properly planned development.

10. The development shall be implemented in accordance with the site wide phasing plan Drwg. No. 9363-FM-ZZ-00-DR-A-1002-01 received.

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

11. Samples of all external facing and roofing materials of the care home shall be submitted to and approved by the Local Planning Authority before development commences. Development shall be carried out in accordance with the approved samples.

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

12. No development shall take place until full details of both hard and soft landscape works have been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc); proposed and existing functional services above and below ground (e.g. drainage power, communications cables, pipelines etc indicating lines, manholes, supports etc); retained historic landscape features and proposals for restoration, where relevant. Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed number/densities where appropriate; implementation programme. Landscaping proposals should be based on the Landscape Masterplans.

Reason: To ensure the provision of amenity afforded by appropriate landscape design.

13. All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with the programme agreed with the Local Planning Authority; and any trees or plants which, within a period of five years from completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation; all works shall be carried out in accordance with the relevant provisions of appropriate British Standards or other recognised Codes of Good Practice.

Reason: to ensure that the appearance of the development is satisfactory

14. The grass playing field proposed under application DC/21/0007/FUL shall be implemented in full in accordance with the approved plans prior to any development of the extra living apartments hereby approved.

Reason: To ensure replacement playing field is provided in order to satisfy exception 4 of Sport England's playing fields policy and NPPF Para 99.

15. No development shall take place until a scheme for the installation of fire hydrants has been submitted to and approved in writing by the Local Planning Authority in conjunction with the Fire and Rescue Service. The fire hydrants shall be installed prior to occupation of any buildings to which they relate.

Reason: In the interests of fire safety.

16. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

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

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

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Strategic Priority 3 and WLP8.40 of the Waveney Local Plan (2019) and the National Planning Policy Framework (2021).

17. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 15 and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Strategic Priority 3

and WLP8.40 of the Waveney Local Plan (2019) and the National Planning Policy Framework (2021).

18. Prior to commencement of development of the care home and blocks A, B and D a noise assessment for each building should be submitted to include all proposed plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified.

Reason: In the interests of amenity.

19. Prior to commencement of development of Blocks A, B and D a sound attenuation scheme including acoustic fencing, aimed at protecting the proposed residential properties from noise from the adjacent sports pitches and ventilation units at the nearby skills academy shall be submitted to the Local Planning Authority in writing. Only an approved scheme shall be implemented and retained thereafter.

Reason: In the interests of amenity.

20. Development of any building shall not commence until a Construction Method Statement for that building has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:
 - the parking of vehicles of site operatives and visitors;
 - loading and unloading of plant and materials;
 - storage of plant and materials used in constructing the development;
 - the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - wheel washing facilities;
 - measures to control the emission of dust and dirt during construction;
 - a scheme for recycling/disposing of waste resulting from demolition and construction works; and
 - delivery, demolition and construction working hours.

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

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

21. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Ecological Impact Assessment (EIA) (The Landscape Partnership, December 2020) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

22. No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

23. No development affecting areas of suitable reptile habitat, as identified in Ecological Impact Assessment (EcIA) (The Landscape Partnership, December 2020), shall take place (including any demolition, ground works, site clearance) until a method statement for reptiles has been submitted to and approved in writing by the local planning authority. The content of the method statement shall include the:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e) persons responsible for implementing the works;
- f) initial aftercare and long-term maintenance (where relevant);
- g) disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To ensure that ecological receptors are adequately protected as part of the development.

24. If the Reserved Matters application for the Outline element of the development hereby approved is not within 2 years from the date of the planning consent, the approved ecological measures secured through Condition 20 shall be reviewed and, where necessary, amended and updated. The review shall be informed by further ecological surveys commissioned to i) establish if there have been any changes in the presence and/or abundance of protected and/or UK Priority species and ii) identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted as part of the relevant Reserved Matters application. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

Reason: To ensure that ecological mitigation measures are appropriately delivered based on up-to-date evidence.

25. No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a site investigation consisting of the following components has been submitted to, and approved in writing by, the local planning authority:
- a) A desk study and site reconnaissance, including:
 - a detailed appraisal of the history of the site;
 - an inspection and assessment of current site conditions;
 - an assessment of the potential types, quantities and locations of hazardous materials and contaminants considered to potentially exist on site;
 - a conceptual site model indicating sources, pathways and receptors; and
 - a preliminary assessment of the risks posed from contamination at the site to relevant receptors, including: human health, ground waters, surface waters, ecological systems and property (both existing and proposed).

b) Where deemed necessary following the desk study and site reconnaissance an intrusive investigation(s), including:

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

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

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

26. No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a detailed remediation method statement (RMS) has been submitted to, and approved in writing by, the LPA. The RMS must include, but is not limited to:

- details of all works to be undertaken including proposed methodologies, drawings and plans, materials, specifications and site management procedures;
- an explanation, including justification, for the selection of the proposed remediation methodology(ies);
- proposed remediation objectives and remediation criteria; and
- proposals for validating the remediation and, where appropriate, for future maintenance and monitoring.

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

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

27. Prior to any occupation or use of the approved development the RMS approved under condition 2 must be completed in its entirety. The LPA must be given two weeks written notification prior to the commencement of the remedial works.

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

28. A validation report must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development. The validation report must include, but is not limited to:

- results of sampling and monitoring carried out to demonstrate that the site remediation criteria have been met;
- evidence that any RMS approved in pursuance of conditions appended to this consent has been carried out competently, effectively and in its entirety; and
- evidence that remediation has been effective and that, as a minimum, the site will not qualify as contaminated land as defined by Part 2A of the Environmental Protection Act 1990.

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

29. In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. No further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety.

An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and conform with prevailing guidance (including BS 10175:2011+A1:2013 and CLR11) and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority.

Where remediation is necessary a detailed remediation method statement (RMS) must be prepared, and is subject to the approval in writing of the Local Planning Authority. The RMS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The approved RMS

must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works.

Following completion of the approved remediation scheme a validation report that demonstrates the effectiveness of the remediation must be submitted to and approved in writing by the LPA.

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

30. Prior to commencement of development full details of photo-voltaic panels and measures to minimise water consumption shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: In the interests of securing a sustainable form of development.

31. No other part of the development hereby permitted shall be occupied until the new access has been laid out and completed in all respects in broad accordance with drawing nos. JN1082-Dwg-0016D & JN1082-Dwg-0019B. Thereafter it shall be retained in its approved form.

Reason: To ensure the access is laid out and completed to an acceptable design in the interests of the safety of persons using the access and users of the highway. *This needs to be a pre-commencement condition because access for general construction traffic is not otherwise achievable safely.

32. All internal footways and cycleways shall be laid out according to drawing no. 9363-FM-ZZ-00-DR-A-1000-08

Reason: To ensure that appropriate pedestrian and cyclist access can be maintained across the site and meet NPPF and LTN 1/20.

33. The use shall not commence until the area(s) within the site shown on drawing no. 9363-FM-ZZ-00-DR-A-1000-08 for the purposes of loading, unloading, manoeuvring and parking of vehicles has / have been provided and thereafter the area(s) shall be retained, maintained and used for no other purposes.

Reason: To ensure that sufficient areas for vehicles to be parked are provided in accordance with Suffolk Guidance for Parking 2019 where on-street parking and or loading, unloading and manoeuvring would be detrimental to the safe use of the highway.

34. Before the development is commenced details of the infrastructure to be provided for electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: In the interests of sustainable travel provision and compliance with Local Plan Sustainable Transport Policies.

35. Before any building is constructed above ground floor slab level details of the areas to be provided for the secure, covered and lit cycle storage including electric assisted cycles shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.(or for dwellings) The approved scheme shall be implemented for each dwelling prior to its first occupation and retained as such thereafter.

Reason: To promote sustainable travel by ensuring the provision at an appropriate time and long term maintenance of adequate on-site areas and infrastructure for the storage of cycles and charging of electrically assisted cycles in accordance with Suffolk Guidance for Parking 2019.

36. Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:
- a) parking and turning for vehicles of site personnel, operatives and visitors
 - b) loading and unloading of plant and materials
 - c) piling techniques (if applicable)
 - d) storage of plant and materials
 - e) provision and use of wheel washing facilities
 - f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
 - g) site working and delivery times
 - h) a communications plan to inform local residents of the program of works
 - i) provision of boundary hoarding and lighting
 - j) details of proposed means of dust suppression
 - k) details of measures to prevent mud from vehicles leaving the site during construction
 - l) haul routes for construction traffic on the highway network and
 - m) monitoring and review mechanisms.
 - n) Details of deliveries times to the site during construction phase

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

37. Outline:

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority (LPA). The scheme shall be in accordance with the approved FRA and include:

- a. Dimensioned plans and drawings of the surface water drainage scheme;

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

The scheme shall be fully implemented as approved.

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

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

38. Within 28 days of practical completion of the last dwelling or unit, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as

required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk within the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

39. Full:

No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

40. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

41. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

42. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:
Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
i. Temporary drainage systems

- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

Informatives:

1. The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service. I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to East Suffolk Council, the SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

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

2. Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.
Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense.

The County Council must be contacted on Tel: 0345 606 6171.

For further information go to:

<https://www.suffolk.gov.uk/roads-and-transport/parking/apply-and-pay-for-a-dropped-kerb/> or: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

County Council drawings DM01 - DM14 are available from:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/standarddrawings/> A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

3. Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.
The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.
The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council

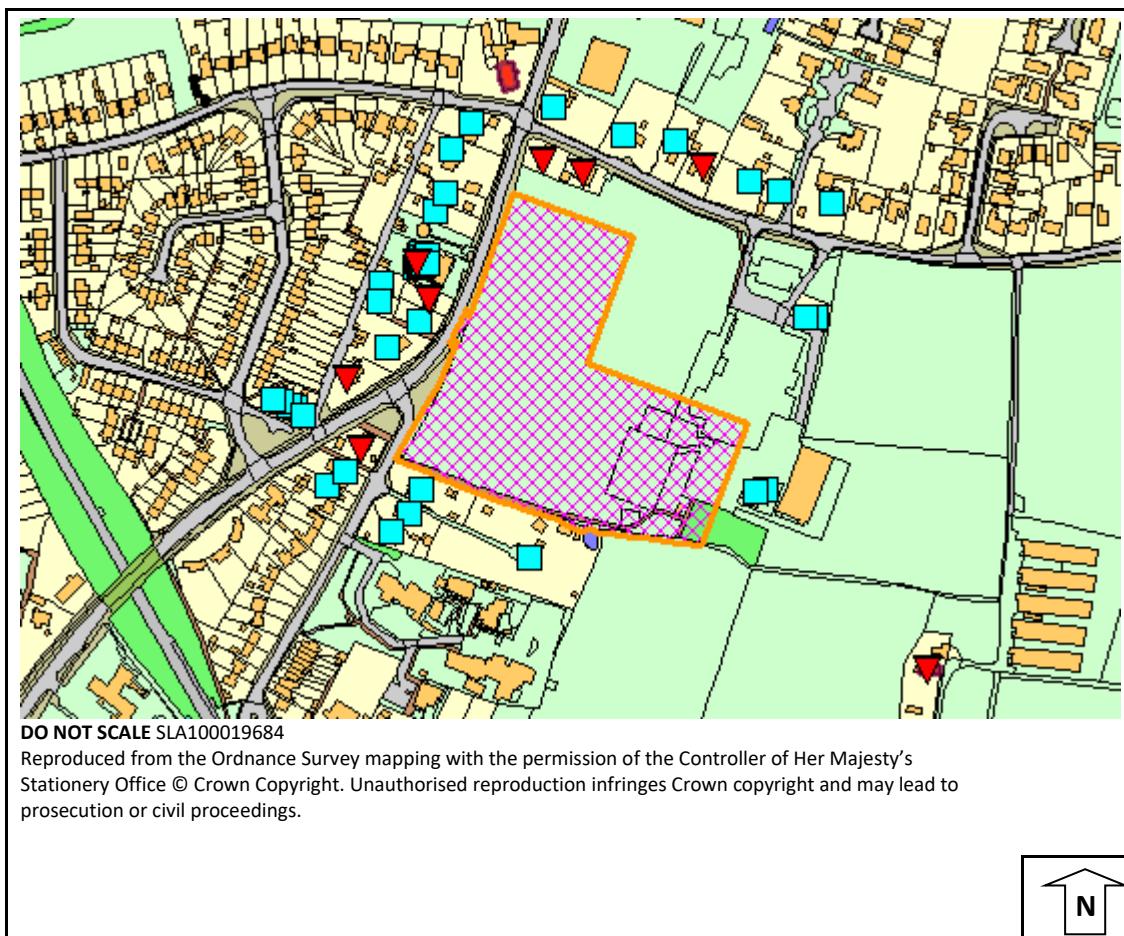
regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing. For further information please visit:
<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

4. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
5. This permission is subject to the completion of a Section 106 legal agreement.
6. The applicant is advised that the proposed development may require the naming of new street(s) and numbering of properties/businesses within those streets and/or the numbering of new properties/businesses within an existing street. This is only required with the creation of a new dwelling or business premises. For details of the address charges please see our website www.eastsuffolk.gov.uk/planning/street-naming-and-numbering or email llpg@eastsuffolk.gov.uk
7. - Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act

Background information

See application reference DC/21/0027/FUL on [Public Access](#)

Map



Key

- Notified, no comments received
- ▼ Objection
- Representation
- ▲ Support