



## Committee Report

Planning Committee South – 30 March 2021

Application no DC/20/1521/FUL

**Location**

Land Off Yarmouth Road  
Melton  
Woodbridge, IP12 1QH

**Expiry date** 2 August 2020

**Application type** Full Application

**Applicant** Christchurch Land and Estates (Melton) Limited and Woodbridge

**Parish** Melton

**Proposal** Care Village comprising an 80 bedroom care home together with 72 assisted care bungalows, cafe/club house, bowling green, car parking, open space provision with associated infrastructure and access

**Case Officer** Rachel Smith  
07887 452719

[rachel.smith@eastsoffolk.gov.uk](mailto:rachel.smith@eastsoffolk.gov.uk)

**Authorising Officer** Liz Beighton, Planning Manager (Development Management)

### 1. Summary

- 1.1 The application proposes a Care Village comprising an 80 bedroom care home together with 72 assisted care bungalows, cafe/club house, bowling green, car parking, open space provision with associated infrastructure and access on land Off Yarmouth Road, Melton, Woodbridge, IP12 1QH.
- 1.2 The site is a greenfield site within the countryside and therefore lies outside of the defined Settlement Boundary of Melton Village. The proposed development would therefore be contrary to national and local policy, including that within the Melton Neighbourhood Plan, which seeks to promote sustainable forms of development. The site is not well located in relation to services and facilities and does not provide adequate links to such services which would be accessible to residents by means other than a private vehicle. The proposal would also result in an adverse impact on the character and appearance of the area, would not provide for affordable housing or have adequate on-site drainage. The

benefits arising from the development do not in this instance outweigh the harm which has been identified.

### Reason for Committee

- 1.3 All planning application decisions including decisions concerning Environmental Impact Assessment (EIA) decisions or considerations requiring Habitat Impact Assessments (HRA) are delegated to the Head of Planning and Coastal Management unless, among other things, the Planning Application is, in the opinion of the Head of Planning and Coastal Management or the Chairman/Vice Chairman of the Planning Committee, of significant public interest; would have a significant impact on the environment; or should otherwise be referred to Members due to its significance in some other respect. It is on this basis that the application is being presented to the Planning Committee for determination.

### Recommendation

- 1.4 The application is therefore recommended for refusal on the grounds that it conflicts with local and national planning policy for the reasons set out in the report.

## **2. Site description**

- 2.1 The site lies approximately 750 metres to the north of the physical limits boundary of Melton (as defined in the Melton Neighbourhood Plan) and comprises approximately 6.32 ha of agricultural land that forms the eastern part of a larger field. The northern site boundary is defined by Jew's Lane, a public right of way lined with mature trees. To the east is Yarmouth Road, which connects Melton village to the south with Ufford to the north. Immediately to the south of the site is the rear gardens of neighbouring residential properties. There is no physical feature defining the western boundary with the land to the west being in agricultural use (and within the applicant's ownership). There is a line of trees along the public right of way to the north and a small copse to the south east in the location of a disused quarry. Otherwise, the site is open. The site lies within Flood Zone 1.
- 2.2 The application site forms the eastern part of a larger site which was subject to an earlier outline planning application for the erection of up to 138 dwellings, a 60 bedroom nursing home with 50 assisted living apartments, car parking, open space provision with associated infrastructure and access (DC/16/4770/OUT). This application was refused in April 2017 for a number of reasons including the development being contrary to the development plan, in an unsustainable location, having an adverse landscape impact, a lack of information to fully assess the potential highways impact of the development, a potential adverse impact on protected European sites and a lack of Legal Agreement to secure affordable housing and infrastructure improvements. An appeal was lodged however it was withdrawn prior to being heard.
- 2.3 The application site is detached from services and facilities located in Melton. Approximate walking distances from the site access on Yarmouth Road to nearby services and facilities are as follows:
- Local Shop – 1.1km
  - Train Station – 1.5km
  - Doctor's Surgery – 2.8km

### **3. Proposal**

- 3.1 The application proposes a residential care home providing 80 bedrooms, a club house/café, 72 assisted care detached bungalows (having been amended from 75 originally proposed), approximately 2.32 hectares of open space, a bowling green, a sustainable urban drainage strategy (SUDS) including habitat and biodiversity enhancements with its primary vehicular access off Yarmouth Road. The application states that the use class of the development would fall entirely within C2. The Council concurs with this view. As the application is made on the basis that the use falls within Class C2, no affordable housing is proposed. The Council does not concur with this position which is discussed further later in the report.
- 3.2 The proposed access would be located slightly to the north of the centre point of the site's Yarmouth Road frontage. The access would lead into the site with the proposed care home located to the north, in the north-eastern corner of the site. There would be a vehicular access to the front of the care home with limited parking designed for dropping off/picking up with the main car park area for the care home located further north to the rear of the building. The care home would be a two-storey building constructed in red facing brick under a slate roof.
- 3.3 Close to the site access but to the south of the main access road would be eight of the proposed bungalows. To the east of these would be the proposed café/club house building. This would have a cross shaped plan form and be set back with car park area in front of it. It would be single storey in scale and provide a kitchen and servery area with seating area. It would have rendered walls on a red brick plinth under a slate roof. To the rear of this would be the main area of public open space and the former quarry which would also be left undeveloped. Further into the site, the street provides a circular route with cul-de-sac style closes off this to provide access to the remaining bungalows. The bungalows would each have two bedrooms and be provided in a mix of detached, semi-detached and terraced forms.
- 3.4 Communal garden spaces are also proposed on the site and towards the south western corner of the site, a bowling green and hut is proposed. A SUDS swale would be located adjacent to the southern site boundary.

### **4. Consultations/comments**

- 4.1 130 third party comments received - 81 objections, 45 in support and four neutral
- 4.2 The main material planning considerations objecting to the application are as follows:
- Loss of greenfield site
  - Not in accordance with the Neighbourhood Plan
  - Would result in settlement coalescence
  - Increase in traffic and congestion
  - Visibility at the access is poor
  - Lack of capacity in local health care services

- Loss of habitats
- No infrastructure to support the proposal
- No local amenities to serve the population
- Too far away from local services for residents to access on foot
- Poor drainage/flooding concerns

4.3 The main material planning considerations in support of the application are as follows:

- Demand for such a facility in the area
- Would provide jobs
- Would free up larger homes for local people
- Safe environment for residents to love and be more independent

## 5. Consultees

### Parish/Town Council

Consultee	Date consulted	Date reply received
Melton Parish Council	4 May 2020	3 June 2020

Melton Parish Council considered the above application at its meeting held on 27 May and, after extensive deliberation, Councillors resolved to recommend refusal. The reasons are set out below.

. Whilst Parish Councillors are supportive of the concept which lies behind the proposal, lack of sustainability in terms of the location proposed for the Care Village is considered a key issue: the proposal is not considered to meet the sustainability requirements set out in paragraphs 108 and 110 of the National Planning Policy Framework (NPPF) (February 2019).

. The Final Draft version of the East Suffolk Final Draft Local Plan, which has just gone through independent examination, defines the settlement hierarchy and states that the development requirements for large villages (in which category Melton is included) will be met through either site allocations in the Local Plan or via a Neighbourhood Plan plus windfalls. The settlement of Melton Park is defined as "Countryside" in respect of which any development will also emerge through the Neighbourhood Plan. The site proposed for this development lies between Melton village and Melton Park. The site is not earmarked for development in the Melton Neighbourhood Plan (2018) (see Neighbourhood Plan Policy MEL1).

. In practical terms the site is very poorly related to facilities and services located in Melton, Woodbridge or Wickham Market. The contention by the applicants that the site is considered to be sustainable in the light of the submitted Transport Assessment is contested. Access by foot between the site and Melton village for example, would require pedestrians to cross Yarmouth Road to access footways which are themselves inadequate in width. Overall Parish Councillors consider that access between the site and amenities and transport links (e.g. Melton Station) is completely inadequate for vulnerable pedestrians, cyclists or for that matter, users of mobility scooters. Public transport is only hourly and does not extend into the evenings. There is no bus service on a Sunday or Bank Holiday. Independent access by residents to and from the site would

therefore be difficult except by private car. In practice staff working shifts would also have to travel to and from work by car.

-The access arrangements for the development do not comply with Melton Neighbourhood Plan Policies MEL2 (which states that proposals to provide dedicated and improved access for cyclists and pedestrians, including disabled users and, in particular, users of mobility scooters, will be encouraged) and MEL4 (which encourages new developments to actually contribute to improvements in the quality of transport services and / or supporting infrastructure).

. The Highway Authority does not consider the site to be in a sustainable location nor the connectivity with transport links and amenities to be adequate.

. Whilst the proposal discounts much in the way of additional traffic impact on the B1438, it is considered that most traffic movements from the site would be likely to be into Melton / Woodbridge and thus via the Melton crossroads, already acknowledged to be at full capacity in normal times.

. Despite the fact that the applicants state there is a demonstrable need for this facility, there are concerns about the impact of the consequential growth on the ability of the local Primary Care Network to cope with the extra demand, as evidenced by the representations made by the Ipswich and East Suffolk Clinical Commissioning Group (CCG). There are already seven facilities providing care in the area and the CCG is concerned that surgeries already struggling to deal with overall demand might be forced to close their lists to other new patients.

Consultee	Date consulted	Date reply received
Ufford Parish Council (neighbouring Parish)	N/A	22 May 2020

Ufford Parish Council wish to object to the above application on the following grounds:

1. The proposal is for development of land designated as open countryside, and is contrary to the Local Plan Policy SP29. It lies outside the defined physical limits of Melton, and is contrary to The Melton Neighbourhood Plan (2018).

2. The development would have an urbanising effect on the rural landscape, and the Local Plan clearly states that a one mile green belt should remain between Melton and Ufford. In addition, this land is prime agricultural land, is currently being used in the production of crops and not just as an unproductive meadow.

3. The site is poorly related to services and facilities in Melton, Woodbridge or Wickham Market. The suggestion is that the 75 assisted care bungalows would be occupied by residents aged at least 75 years. It is difficult to see how integration in to the community is achieved by the need for elderly residents to walk through the development to reach the entrance on to Yarmouth Road, and then walk nearly 1km to Melton to access local facilities and then make the return journey up the hill, which is essentially quite steep, on a narrow uneven path. The route would entail crossing the B1438 at least twice.

4. Transport : There are three main categories of users to consider: the residents, who, as already highlighted, are less likely to be making independent journeys; the care home staff who will be

working a 24/7 shift pattern; and the relatives and friends of residents who will wish to visit.

The staff will need transport to get to work to a site operating a 24/7 shift pattern; the relatives and friends are very likely to wish to visit at weekends and bank holidays and evenings. The long transport statement did not address these needs adequately, and claims the site is in a sustainable and accessible location, not requiring the use of cars; it is not. The number 64 bus passing along Yarmouth Road travels in each direction hourly with the last northbound bus before 7pm, and the last southbound before 8pm. In addition there is no bus service on Sundays or Bank Holidays.

The rail station at Melton is not much help as there is quite a long walk from there for staff or visitors to and from the proposed Care Village.

The transport statement claims that it would be possible to cycle on the footway to and from Melton, but this is not a shared cycle-footway, and it is mostly a very narrow path for pedestrians alone. Cycling would be on the B1438 which is quite narrow, particularly passing parked cars and at the narrow Tollgate area.

The result would be many more car journeys, which contradicts NPPF 2019, para 127 which should be to *'encourage walking and cycling and the use of public transport rather than reliance on cars.'*

1. Healthcare Facilities: As has been highlighted by Dr John Lynch of the Framfield Medical Centre and Clinical Director of the Deben Healthcare Group, the proposal would put considerable additional strain on local healthcare providers' ability to meet both future and current needs. We strongly question the need for further Care Homes and Sheltered facilities in this area, which is already well served by care and nursing homes.

In addition, given the reported fatalities in Care Homes resulting from Covid-19 pandemic, we question the scale of this proposed development given the infection control risks from massing of assisted living alongside a care home and from staff cross-working.

2. Parking: The number of parking spaces do not comply with Suffolk CC recommendations and certainly seems insufficient. 30 spaces for staff parking suggest the acceptance that public transport may not be the answer. Meanwhile only 18 spaces for visitors at the Care Home is certainly not the minimum of one space per 3 beds required. The bungalows have some parking areas but no specific spaces for visitors.
3. Highways: The proposed new entrance on the B1438 may have what appear to be adequate visual splays, but this is a 30mph stretch of road, close to the speed limit change to 40mph and in both directions many vehicles exceed even 40mph. Many waste disposal trucks travel on this road back to the Ufford depot.

The road may look straight and flat, but on a site visit as anyone local will testify, there is a brow of the hill in one direction and a bend in the other. This combination with speeding traffic is a potential danger. The proposal describes a ghost right lane for turning, and an informal pedestrian crossing with a refuge island. However there do not appear to be any

drawings showing these and it is hard to see how the road width can accommodate them safely.

The proposed Care Village has the potential to create a significant increase in traffic along the B1438, with staff, visitor, resident journeys, taxis, healthcare professionals, ambulances and also heavier traffic with delivery lorries, specialist clinical waste collections etc. This additional traffic will cause a problem whether travelling north or south.

If traffic turns towards Melton it will reach the crossroads of the B1438 and A1152, already at capacity, and with air quality concerns particularly past the houses close to the road on The Street, and the Primary School situated at the junction. The Draft Local Plan has already identified that £250k to £300k is needed to improve capacity at Melton crossroads and this is prioritised as essential even before further development takes place.

Meanwhile if traffic travels north it reaches the notorious 'triangle junction' on the south side of Ufford, then either follows towards the southbound A12, or worse for Ufford, travels the length of the High Street towards Wickham Market, or possibly taking the A12 northbound. The residents of Ufford do not want or need any more through traffic.

4. Light Pollution: The site in question is in open countryside, and it is presently dark at night. It is inevitable that for security for staff and residents that there will be external lighting overnight, when a 24/7 service is taking place. No matter how modern the system it will cause light pollution.
5. Design and Materials: The proposed design and architectural features look quite out of keeping with the locality. It is claimed that the care home represents a maltings and barns, and which has grown 'organically'. Clearly any opinion about design is subjective, but the result here would be completely incompatible with the landscape and countryside within which the development would be sited. We would also strongly refute the claims that facilities could be an asset to the wider community. We cannot see how a café and Bowls Green would provide facilities as these already exist in the area.

In addition, when referring to the Draft Local Plan, which is at an advanced stage, we would refer you to the section regarding new residential development outside defined settlement boundaries, where it is suggested development would be limited to:

- a. Affordable housing to meet identified local needs on exception sites adjacent to, or well related to, Settlement Boundaries or clusters of housing in the countryside (in accordance with Policy SCLP5.11 and Policy SCLP5.4);
- b. Limited development within existing clusters (in accordance with Policy SCLP5.4);
- c. Replacement dwellings on a one to one basis where these are no more visually intrusive in the countryside than the building to be replaced;
- d. Subdivision of an existing larger dwelling;

- e. Conversion of an existing building (in accordance with Policy SCLP5.5);
- f. Rural workers dwellings, where there is an essential need for a rural worker to live permanently at or near their place of work (in accordance with Policy SCLP5.6);
- g. Other residential development consistent with policy on residential development in the countryside contained in the National Planning Policy Framework.

The development proposed does not fit in to any of the above criteria and in addition there are 15 site allocations in the Draft Local Plan of the former Suffolk Coastal area, which contain a specific requirement to include housing to meet the needs of older people.

The emerging Local Plan also highlights that opportunities should be taken to integrate older persons housing into the community, in order to address potential issues of isolation and to promote inclusivity. For example, older persons housing on sites well related to schools, community centres or other focal points can help to create integrated communities. The Suffolk Health Ageing Needs Assessment (2018) identifies tackling social isolation and loneliness as one of its recommendations. There is a particular need for older and vulnerable people to have opportunities to access sustainable transport and modes of travel other than the car.

### **Conclusion**

The former Suffolk Coastal area has one of the oldest populations of any district in the country and this characteristic places additional requirements on the Local Plan, service providers and infrastructure provision, so it is acknowledged that there may be a need for such a care village in the future.

Whether or not there is such a need, for all the reasons highlighted above it is clear that the site proposed is simply not the right place for it and the expansion in elderly persons accommodation provision needed should come either from the sites already allocated in the Draft Local Plan or sites that are consistent with the local plan and made neighbourhood plans.

### **Statutory consultees**

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	7 May 2020	20 May 2020
Summary of comments: Concerns regarding capacity in the local health care system		



Consultee	Date consulted	Date reply received
Suffolk County Council Section 106 Officer	11 May 2020	12 May 2020

Summary of comments:

Require contribution of £16,200 towards libraries. Any Highways requirements tbc.

Consultee	Date consulted	Date reply received
Suffolk County Council - Highways Department	4 May 2020	27 May 2020

Summary of comments:

Holding objection

Consultee	Date consulted	Date reply received
Environment Agency	4 May 2020	No response

Summary of comments:

None received

Consultee	Date consulted	Date reply received
Suffolk County Council Flooding Authority	4 May 2020	15 May 2020

Summary of comments:

Holding objection (see report)

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	4 May 2020	17 June 2020

Summary of comments:

No observations.

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	4 May 2020	20 May 2020

Summary of comments:

Would have impact on NHS funding programme

No capacity in Primary Care Network

Increase no of elderly in the area which already has 7 care homes

Undue stress of local health care provision

## Non statutory consultees

Consultee	Date consulted	Date reply received
Suffolk Fire And Rescue Service	N/A	12 May 2020
Summary of comments: Hydrants required. Sprinkler System recommended		

Consultee	Date consulted	Date reply received
Anglian Water	21 May 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
The Woodbridge Society	N/A	26 May 2020
<p>Object to the application. An application to build a nursing home and a number of dwellings on this site was refused by the Council in 2017. The reasons given included that the application was contrary to the development plan as it lies in open countryside outside the defined physical limits for Melton. There is a presumption against development at such a location, which is poorly related to local services. As the council now has an agreed housing land supply, the presumption against development should be maintained.</p> <p>Since the earlier application, the Melton neighbourhood plan has been adopted. This site is not identified as a potential site for development. Despite the claim made by the applicant, it is not within easy walking distance from Melton Station.</p> <p>Consider the comments made by the Clinical Director of Framfield Medical Centre to be significant and important.</p>		

Consultee	Date consulted	Date reply received
Waste Management Services	N/A	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	4 May 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Head of Economic Development	4 May 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Disability Forum	4 May 2020	26 May 2020
Summary of comments: Concerns including distance from facilities. Queries the claimed 12 minute walk to facilities - at what pace? No details of slopes and levels. Seeks a commitment to meeting Part M4(3)		

Consultee	Date consulted	Date reply received
Police - Alan Keely Crime Reduction Beccles Police Station	4 May 2020	29 May 2020
Summary of comments: A number of security concerns with the layout		

Consultee	Date consulted	Date reply received
Suffolk County Council - Rights Of Way	4 May 2020	No response
Summary of comments: None received		

### Reconsultation consultees

Consultee	Date consulted	Date reply received
Melton Parish Council	21 October 2020	9 November 2020
Melton Parish Council's Planning and Transport Committee considered the original application on 27 May and submitted a detailed recommendation for refusal on 3 June 2020. Whilst it is fair to say that Councillors tried hard to find merit in the proposals, they came to the conclusion that they		

felt obliged

to recommend refusal. The detailed reasons for that as set out in the original recommendation may be summarised below:

1. The lack of sustainability and connectivity in relation to the proposed location
2. The proposal was not in conformance with the Melton Neighbourhood Plan
3. Access to the site is poor and is unsupported by Highways
4. The additional demands made by such a large concentration of elderly patients would place unsustainable demands on the local primary care network.

The Council's Planning and Transport Committee have now considered the revised plans, designs and covering reports. Whilst they are designed to overcome earlier objections, Councillors feel that the following fundamental problems remain:

1. The proposed location is in open countryside and is contrary to the Melton Neighbourhood Plan (Policy MEL1).
2. The site is unsustainable in terms of paragraph 110 of the National Planning Policy Framework primarily because the connectivity to Melton village, services and facilities is poor. The creation of a gated community in the countryside where residents without access to a private car cannot access mainstream society outside the Home other than by the Home's own minibus is only likely to lead to social isolation. Existing public transport is inadequate to serve a development such as this.
3. Highways have continued to regard any proposed mitigations for the lack of sustainable access as unsatisfactory.
4. Data produced by the applicant in respect of likely vehicle movements in and out of the development is unsatisfactory and consequently the impact on the Melton crossroads remains unclear; although the

Consultee	Date consulted	Date reply received
Ufford Parish Council (neighbouring Parish)	21 October 2020	9 November 2020

Ufford Parish Council made an objection to the above application on 22nd May 2020. After many similar objections being made by other consultees, and numerous neighbours, revised plans and designs along with several new reports have appeared on the planning portal with arguments aiming to overcome the objections made to this proposal.

We have considered the new documentation, and cannot change our original opinion that whether or not there is a need for such a Care Village, the site proposed is not the right place for it. We continue to object to this application and will repeat briefly our reasons from the letter of 22<sup>nd</sup> May, and refer where appropriate to the recently filed amendments and additions (shown in bold for easy of reading).

1. The proposal is for development of land designated as open countryside, contrary to the Local Plan SCLP 3.3. It lies outside the defined physical limits of Melton, and is contrary to The Melton Neighbourhood Plan (2018). Nothing in the recent documents can gainsay this.
2. The development would have an urbanising effect on the rural landscape, eroding the green belt between Melton and Ufford. The newly filed "Landscape and Visual Matters: Response" document does nothing to convince us that this agricultural land bounded by hedgerow should become a large expanse of low rise housing with a

huge brick building and that it would not then harm the landscape.

3. The site is poorly related to local services and facilities. It is interesting to see that in the response to objections made, the applicant now states that very few residents will be making independent journeys. There is no more comment about walking or cycling to Melton, and now there will be a Care Home operated minibus which will take residents on any necessary outings. Our comment is that this illustrates what an unsuitable location this is for any elderly people who still have some ability and desire to live an independent life.

**The Care Village is beginning to sound more like a prison. For anybody who does not own a car and is capable of driving, the outings will be very dependent on availability of places in a minibus, and cannot be spontaneous. By the time journeys are made for medical, dental or healthcare reasons there will be little opportunity for outings for pleasure.**

**We also concur with the comments made by Eloise Limmer, ESC Design and Conservation Officer in her letter of 4th June 2020 *“There is also the fundamental issue of the unsustainable location of the site and the fact that it has been designed as a gated community that would be physically and socially isolated from the existing community.”***

4. Transport: We originally objected to the siting of the Care Village partly because of the lack of useful and comprehensive public transport for use by residents, staff and visitors. **There is nothing in the applicant’s response to the objections which overcomes this point, as there is no improvement in transport. Their only comment is to emphasise the use of a minibus service for residents, on which we comment at point 3. Meanwhile the unwritten agreement is that there will be many more car journeys.**

5. Healthcare Facilities: We highlighted the pressure already suffered by local GP practices. The applicant has now submitted a **Health Impact Assessment. Our response to this report produced by Pegasus, is that it is flawed and contains many errors and thus reaches misleading conclusions. The number of local GP practices who could accept new patients at the Care Village is only three; the numbers of patients already cared for is incorrect, as is the number of local GPs. The local group of GPs have already responded to the updated documents insisting that their original objection still stands.**

6. Parking: **There are now some visitor parking bays near the bungalows, but we still question an adequate number of spaces for Care Home residents’ visitors.**

7. Highways: We made objections to the siting of the entrance and exit to the Care Village; and to the amount of additional traffic which would use the B1438 worsening congestion at the Melton crossroads, increasing the risks at the Triangle junction in Ufford, and possibly more traffic using the High Street in Ufford to reach the A12 heading north. **Nothing that is said in responding to these objections overcomes them. The trip generation figures given are very limited. The numbers presumably relate only to duty staff numbers (a further admission that all journeys will be made by car). However, throughout the day many more trips will be made, including large vehicles delivering supplies, removing waste, etc. we stand by our original objection on this point.**

**We are also concerned that the application gives no details of how many vehicles (Mini-Buses) are planned for up to 150 people!**

8. Light Pollution: We objected to the lighting which would be necessary for security for such a 24/7 operation in what is now dark countryside. **No comment has been made by the applicant to counter this objection.**

**9. Design and Materials:** We criticised the original design and materials proposed as totally out of keeping with the locality. **The architectural design, proposed materials and layout of the bungalows are the main changes made in the recent amendments. While there seems to be some improvement in the layout and the design of the bungalows, the Care Home has changed to look more in keeping with the old St Audry's Hospital. It would be overbearing and dominating in the location with proximity to the road, the houses of Melton Terrace and the PROW behind.**

We have outlined above how the new documents in support of this application have not overcome our previous objections. Furthermore there are two issues we had not specifically raised before but have been highlighted by inadequate responses.

Firstly, the response to issues raised about Flood Risk and Drainage, which extraordinarily is clearly still a piece of work in progress and there is no answer offered.

Secondly, the comments on wildlife habitat, that the disused quarry, or pit, close to the B1438 on the south eastern boundary of the site would be *"fenced off and given over to wildlife"*. It would amount to a small island of scrubby land with the road on one side, and buildings and night lighting on the other. Wildlife needs corridors to travel.

We hope you will consider these reasons for refusing permission to develop a Care Village in what we feel is the wrong location.

Consultee	Date consulted	Date reply received
Anglian Water	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Disability Forum	21 October 2020	18 November 2020
Summary of comments: Previous comments remain valid		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Head of Economic Development	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Suffolk Fire And Rescue Service	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	21 October 2020	10 November 2020
Summary of comments: The CCG is in ongoing discussions with the developer to look at if the impact on primary care in the area can be mitigated? As things stand and no conclusion from these discussions so far then the CCG remains with it's original response to the earlier planning application.		

Consultee	Date consulted	Date reply received
Police - Alan Keely Crime Reduction Beccles Police Station	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Suffolk County Council Section 106 Officer	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Suffolk County Council Flooding Authority	21 October 2020	9 November 2020
Summary of comments: Maintains holding objection		

Consultee	Date consulted	Date reply received
Suffolk County Council - Highways Department	21 October 2020	22 October 2020
Summary of comments: Objections not overcome		

Consultee	Date consulted	Date reply received
Suffolk County Council - Rights Of Way	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	21 October 2020	11 November 2020
Summary of comments: Holding objection		

Consultee	Date consulted	Date reply received
Waste Management Services	21 October 2020	No response
Summary of comments: None received		

Consultee	Date consulted	Date reply received
The Woodbridge Society	21 October 2020	3 November 2020
Summary of comments: Repeat objections of 23 May 2020		



Consultee	Date consulted	Date reply received
Suffolk County Council Section 106 Officer	4 May 2020	12 May 2020
Summary of comments: Require contribution of £16,200 towards libraries. Any Highways requirements tbc.		

Consultee	Date consulted	Date reply received
Suffolk County Council Archaeological Unit	4 January 2021	14 January 2021
Summary of comments: Suggests a condition regarding programme of archaeological works and recording.		

Consultee	Date consulted	Date reply received
Head of Environmental Services	4 January 2021	12 January 2021
Summary of comments: Comments regarding noise, land contamination, construction management plan and air quality.		

Consultee	Date consulted	Date reply received
Environment Agency	4 January 2021	No response
Summary of comments: None received		

## 6. Publicity

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

<b>Category</b>	<b>Published</b>	<b>Expiry</b>	<b>Publication</b>
Departure	21 August 2020	14 September 2020	East Anglian Daily Times

<b>Category</b>	<b>Published</b>	<b>Expiry</b>	<b>Publication</b>
Major Application	7 May 2020	29 May 2020	East Anglian Daily Times

## Site notices

General Site Notice	Reason for site notice: Major Application In the Vicinity of Public Right of Way Contrary to Development Plan Date posted: Expiry date:
General Site Notice	Reason for site notice: Major Application In the Vicinity of Public Right of Way Date posted: 21 May 2020 Expiry date: 12 June 2020

## 7. Planning policy

- 7.1 National Planning Policy Framework 2019
- 7.2 East Suffolk Council - Suffolk Coastal Local Plan (adopted September 2020) policies:

- SCLP3.2 - Settlement Hierarchy
- SCLP3.3 - Settlement Boundaries
- SCLP5.1 - Housing Development in Large Villages
- SCLP5.3 - Housing Development in the Countryside
- SCLP5.8 - Housing Mix
- SCLP5.10 - Affordable Housing on Residential Developments
- SCLP7.1 - Sustainable Transport
- SCLP7.2 - Parking Proposals and Standards
- SCLP9.2 - Sustainable Construction (
- SCLP9.5 - Flood Risk
- SCLP9.6 - Sustainable Drainage Systems
- SCLP10.1 - Biodiversity and Geodiversity
- SCLP10.4 - Landscape Character
- SCLP10.5 - Settlement Coalescence
- SCLP11.1 - Design Quality
- SCLP11.2 - Residential Amenity
- SCLP11.3 - Historic Environment
- SCLP11.5 - Conservation Areas
- SCLP11.7 - Archaeology

- 7.3 Melton Neighbourhood Plan (2018) policies:

- MEL1 - Physical Limits Boundaries
- MEL2 - Dedicated Access for Cyclists and Pedestrians
- MEL4 - Bus and Community Transport Provision
- MEL16 - Melton Conservation Area

## **8. Planning considerations**

### The Development Plan

- 8.1 The development plan is central to the delivery of sustainable development. Section 38(6) of the Planning and Compensation Act 2004 states that the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan, for the purposes of this application, comprises the East Suffolk Council - Suffolk Coastal Local Plan (September 2020) and the Melton Neighbourhood Plan (2018). The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are key material considerations.
- 8.2 The Local Plan addresses the housing needs of older people in a number of ways. The types of accommodation needed for older person households, derived from the Long Term Balancing Housing Markets model and Strategic Housing for Older People tool as referenced in the SHMA evidences that the majority of older people will require general housing. In reflection of the extent of need for older persons accommodation, Policy SCLP5.8 references that housing development over the plan period will contribute to the significant need for accommodation for older people and that all housing development of ten or more dwellings should demonstrate how it will contribute to meeting the needs of older people. It is acknowledged that on smaller sites (below 50 dwellings) the provision of specialist accommodation (sheltered and extra care) is less likely to be feasible and the Council would therefore expect that the needs for older persons housing on such sites to be addressed through provision of M4(2) and M4(3) housing and other forms of housing as set out in paragraph 5.49, as part of the housing mix. On larger sites (of 50 or more dwellings) the Council would expect that, in meeting this policy requirement, consideration is given to needs for specialist housing and that this is addressed where feasible.

### Sustainable growth and relationship to settlement

- 8.3 As the site lies outside of the defined physical limits boundary of Melton, it is classified as 'Countryside' as set out in Policies SCLP3.2 and SCLP3.3 of the Local Plan and MEL1 of the Neighbourhood Plan. The site is situated between Melton Village to the south which is classified as a 'Large Village' in the Local Plan and Melton Park to the north west which is classified as 'Countryside'. The site access is approximately 750 metres from the Physical Limits Boundary of Melton, as shown on the Proposals Maps. Policy MEL1 of the Neighbourhood Plan (Physical Limits Boundaries) states that development proposals outside the physical limits boundary will not be permitted unless they are in accordance with the Suffolk Coastal Local Plan policies on appropriate uses in the countryside.
- 8.4 'Large villages' are recognised by the Local Plan as providing 'a range of services meeting the daily needs of their residents and surrounding hinterland' and can accommodate allocations and development within the settlements appropriate to the size, location and character of the village. Opportunities for housing in the countryside are limited to where it is in accordance with another Policy in the Local Plan.
- 8.5 As the site is located within the countryside, the principle of residential accommodation is not acceptable. An earlier application proposing residential accommodation and a care

home on this site has previously been refused for this reason. An appeal of this decision was withdrawn prior to it reaching a public Inquiry. The Local Plan does set out, at Policy SCLP5.3, situations where an exception to this rule may be made. This includes for affordable housing on exception sites, development within 'clusters' (SCLP5.4), replacement dwellings on a one for one basis, subdivision of a larger dwelling, conversion of an existing building (SCLP5.5), rural workers dwellings (SCLP5.6) or where in accordance with the NPPF.

- 8.6 The NPPF, at paragraphs 77 - 79 sets out where rural housing may be appropriate. This includes exception sites to meet a local need, where it would enhance or maintain the vitality of rural communities or some circumstances where isolated housing may be appropriate. The application site and proposals do not meet any of the criteria set out within the Local Plan or the NPPF and therefore the principle of development of the site is not in accordance with the spatial strategy set out in the Local Plan.
- 8.7 Some growth has been identified for Melton Village and this includes a 9.7 hectare allocation within the Melton Neighbourhood Plan (MEL20) for mixed use development on land off Wilford Bridge Road. The site will provide a combination of business, residential and open space uses. The site is adjacent to the existing physical limits boundary and well related to services and facilities in the village including being adjacent to Melton railway station. It is intended that approximately 55 new homes can be accommodated on this site and a planning application (DC/20/1831/OUT) is currently being considered for the erection of up to 55 dwellings on this site. The application proposal therefore does not adhere to the planned sustainable growth pattern for Melton Village.

#### Location

- 8.8 Although development of the site would be contrary to the spatial plan for sustainable development in Melton, the application proposal should be considered further to assess if there are any material planning considerations to indicate that the proposal should be considered favourably, contrary to the development plan. The site access lies approximately 750 metres away from the edge of the Physical Limits Boundary – although from further into the site, and/or to reach the centre of Melton or some of the services and facilities, a greater travel distance would be required. Due to the nature of the accommodation proposed, it is likely that a number of residents will have mobility issues and require assistance from wheelchairs/mobility scooters and/or other walking aids.
- 8.9 Although the site is not considered to be 'isolated' in terms of paragraph 79 of the NPPF given there is some development close by, its location is isolated from the services and facilities in Melton, not only given the physical distance but also due to the inadequacies of the walking route into Melton. There is no pavement on the western side of Yarmouth Road in this location so to access Melton village from the site would first involve crossing Yarmouth Road. The footpath on the eastern side of Yarmouth Road extends as far as Lower Road. A pavement is then provided on the western side of Yarmouth Road. This pavement continues into Melton village however it is narrow and, for a stretch is located at a higher level than the road, behind a hedge and is poorly lit. There is therefore poor surveillance of the footway which could result in users being concerned for their personal safety. On entering Melton village, the pavement narrows to a pinch point that makes its use by anyone, difficult and unsafe and extremely difficult for a wheelchair, mobility chair or walking aid user without stepping into the road. The walking route would therefore not

be inclusive for all users seeking to sustainably and safely move between the site and Melton Village and local facilities nor would it encourage all occupiers of the site capable of walking or using wheelchairs or mobility scooters to use the footway to reach the services and facilities. As part of the previous appeal on this site, the Council instructed Sustrans to undertake a walking review of the route from the site into Melton and beyond. This concluded that due to the barriers to walking and cycling from the site to local services, facilities and employment, the location of this development should not be considered sustainable and while the application proposal in this case is different to the scheme considered previously, many of the points made remain valid to this proposal as the site location and access routes remain the same. This report has been shared with the applicant and Highway Authority.

- 8.10 Given the distance from the settlement and the undesirable pedestrian route, it is highly likely that residents, staff and visitors to the site would be highly reliant upon unsustainable use of the private motor car. Although the application states that the site would be served by a minibus providing trips into nearby settlements for residents, it has not been demonstrated that this service would be guaranteed, and its requirement highlights the need for vehicular access to services and facilities. The application proposal does therefore not comply with the environmental objective of sustainable development as set out in the NPPF.
- 8.11 The proposal is not considered to be acceptable and does not accord with NPPF 108 and 110. Melton Neighbourhood Plan Policy MEL2 supports proposals to provide dedicated and improved access for cyclists and pedestrians, including disabled users and, in particular, users of mobility scooters. Although there is reference to the provision of a pedestrian island refuge on Yarmouth Road to the south of the access, it has not been indicated on the site access plan. Even if this were secured, it is not considered sufficient to meet the aims of this policy. Similarly, Policy MEL4 of the Neighbourhood Plan supports development proposals that contribute towards improvements in the quality of public and community transport services and/or supporting infrastructure serving the Neighbourhood Plan area. The application indicates that a minibus from the site to local services and facilities may be provided however this would only serve residents of the development and not the wider community. Due to the location of the proposed development and the lack of proposed enhancements to pedestrian and cyclist routes, the proposal is also contrary to SCLP7.1 which encourages the use of non-car transport opportunities, in particular seeking to provide safe pedestrian and cycle access to services and facilities and to protect and enhance existing pedestrian routes.
- 8.12 The NPPF is also clear in its aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments and street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods. It also seeks to achieve developments that are safe and accessible and supports a high quality of life and community cohesion – for example through the use of clear and legible pedestrian routes. Healthy lifestyles are also supported and therefore development should provide safe and accessible access to local shops with layouts that encourage walking and cycling. The location of the proposed development, detached from the wider community and the lack of safe and accessible pedestrian routes fail to meet these aims.

- 8.13 It is noted that the submitted Transport Assessment (TA) section 4.6 and Design and Access Statement section 5.26 both state that a pedestrian island refuge will be provided to the south of the access junction to enable pedestrians to cross Yarmouth Road to the wider footway network. However, this is not shown on the access layout plan (ref: 103712-001) within the TA or any other submitted plans. Even if details of this were provided and its provision was secured, the addition of this facility would not address the sustainable access issues described above. Similarly, although the application makes reference to a minibus service that will be available to access local amenities, there is no guarantee that this service would be provided nor of its frequency/availability/capacity etc. It therefore does not provide acceptable mitigation for the lack of suitable sustainable access for vulnerable road users. This is therefore contrary to paragraph 102 of the NPPF which identifies the need to consider transport issues early in development proposals, so that, among other things, opportunities to promote walking, cycling and public transport use are identified and pursued and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

#### Specialist accommodation

- 8.14 The application refers to the lack of allocations or dedicated policy for care homes or extra care accommodation in Melton, or in the wider Local Plan area and that this is contrary to paragraph 61 of the NPPF. Paragraph 61 requires that "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies". It goes on to list some of these groups, including older persons, but also states that this list is not exhaustive. It does not state that Local Plans must have a policy dedicated to providing housing for each, or any of, of the listed groups. The Local Plan contains no allocations for sole Care Homes and/or assisted or extra care accommodation and the applicant contends that this is a significant omission.
- 8.15 The Council's Local Plan has been recently adopted (September 2020). The Planning Inspector who Examined the Local Plan gave significant attention to whether the plan adequately met the identified housing needs of all the community. It was considered by the Inspector that the Plan as submitted would not be effective in meeting the housing needs for older and disabled people in that it did not demonstrate that the needs of older and disabled people have been assessed, nor were these needs adequately reflected in the policies, the further information submitted by the Council in this respect satisfied the Inspector that the needs identified have been calculated appropriately and Main Modifications were made to the Plan to address the matters identified. Whilst the Plan does not separate out a need for age restricted housing from general housing, it nevertheless includes provision for housing that would meet the needs of older people within the overall general housing provision, and plans in excess of the overall housing requirement. . Whilst the Plan does not typically make specific allocations for housing for older people and disabled people, the Inspector considered that its policies and allocations together reflect the identified needs as required in national policy and as amended considered that the Plan was positively prepared and sound in this regard and should boost the supply of homes for older and disabled people. He concluded that it was not necessary for the Plan to include a specific exceptions type policy for the provision of housing for older people and disabled people on land outside of settlements.

- 8.16 In respect of housing for older people, the NPPF states that the needs for different groups, which includes older people, should be assessed and reflected in planning policies (paragraph 61). The Strategic Housing Market Assessment Part 2 for the Ipswich Strategic Housing Market Area (2017), which forms part of the evidence underpinning the emerging Local Plan, has assessed the needs for specialist housing and housing for older people over the plan area and over the plan period. This includes needs for sheltered housing, enhanced sheltered housing, extra care housing and registered care (care and nursing homes). The needs for housing for older people are set out in Tables 5.2 and 5.3 in the Local Plan.
- 8.17 Policy SCLP5.8 'Housing Mix' of the Local Plan is the principal policy which sets out a policy approach to meet the needs for different groups, including housing for older people. This includes for proposals for ten or more units that it is demonstrated how the development will contribute to meeting the needs of older people. Also, on proposals of ten or more non-specialist dwellings, at least 50% of dwellings would need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the building regulations. The policy in the Local Plan also sets out that sheltered and extra care housing will be supported where the scheme incorporates a mix of tenures to meet an identified need and that all specialist dwellings will be expected to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations. Therefore, while there is no specific policy relating to the provision of specialist accommodation or accommodation solely for older people, provision for this is embedded within the policy and it is supported, where in accordance with the spatial strategy for development.
- 8.18 In terms of the mix of units proposed it is noted that all 72 assisted care bungalows are proposed to be two bedrooms. Policy SCLP5.8 expects that new development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 and 2 bedrooms). It is not clear how or whether any specific needs have been identified to inform the proposals, however the disaggregation of needs for specialist housing (shown in Table 5.2 of the Local Plan) shows that the majority of need for specialist housing in the Suffolk Coastal Local Plan area is for one bedroom accommodation. The mix proposed would therefore not reflect the needs that have been identified through the Strategic Housing Market Assessment.

#### Use Class

- 8.19 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. The other element of the proposal involves the provision of 72 bungalows. In *Rectory Homes v SSHCLG* [2020] EWHC 2098 (Admin), Holgate J confirmed that a Class C2 development could include accommodation in the form of dwellings, for example flats and bungalows, 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. He also noted that collectively the accommodation must be capable of being described as a residential institution. As to this, he said "institution" in Class C2 must

have a broad meaning, which would include, for example, an "organisation" managing the whole of a development or scheme in order to ensure that the needs of residential occupants for "care" are delivered. A development for an institutional or organisational use in this broad sense is compatible with the provision of residential accommodation and care to occupants living in dwellings within the scheme." The application describes the bungalows as either a two-bedroom dwelling or a two-bedroom Almshouse. The application also sets out that most of the occupiers of the bungalows would require 'extra care' and require 'very assisted living'. Although no formal agreement of a care package or occupation restrictions is in place (for example as set out in a S106 Agreement) the application proposals set out that residents of the bungalows are required to purchase a minimum care package of four hours a week from a 'menu'. It also mentions a minibus service being available to transport residents into Melton, Woodbridge or to supermarkets and that any shopping would be managed by the operator, so residents are not required to carry items into their homes. The site would be managed by a CQC-registered care operator which appears to manage the properties and the care delivery. There would be some outdoor communal spaces and facilities and also a community centre and clubhouse. It is therefore agreed that the use of the site falls within Class C2.

### Highways

- 8.20 Suffolk County Council Highways Authority has raised concerns that, as submitted, it is unclear whether the proposal would significantly increase capacity issues at the nearby Melton signalised crossroads. The submitted Transport Assessment (TA) section 5.4 states that the cafe and club house would not generate any external trips, whereas the Planning Statement section 5.14 states that the club house would become a vibrant community hub open to the public. The bowling green also needs to be considered on this basis.
- 8.21 The TRICS methodology used to forecast trip generation for the site whereby 'care home' sites have been used exclusively to forecast trips does not provide an acceptable assessment of the trip generation. Individual assisted care bungalows in a residential estate style setting, each with an allocated parking space are different to a care home whereby residents in bungalows could feasibly own and park a vehicle for personal use. Evidence of trip rates from similar settings should be provided to ensure that a robust assessment of trip generation can be made.
- 8.22 The TRICS sites used to gather nursing home trip rates are located in areas very different to Melton, which could be regarded as a rural location with limited access to key amenities. Locations such as Derby, Rochdale and Southampton (albeit out of city centre locations) have far superior public transport provision and local amenity access.
- 8.23 The local Highways Authority is therefore unable to properly assess the impact of likely trips generated by the development.

### Parking

- 8.24 The number of vehicle parking spaces for the care home, bungalows and clubhouse are acceptable (in accordance with Suffolk Guidance for Parking - updated 2019). Disabled spaces and cycle parking locations are also now shown, and these could be conditioned. There are therefore no concerns in relation to parking provision on site.



### Pedestrian access within the site

- 8.25 As a private gated development, there would be no impact upon highway safety as a result of the lack of segregated pedestrian access in some locations, however it is recommended that the development accords with NPPF 110 which does not currently appear to be the case due to the lack of segregated and direct pedestrian access within parts of the development layout.

### Passenger Transport

- 8.26 New bus stops are required as close to the site entrance as possible with pedestrian routes to the care home and the bungalows to encourage use of public transport. Earlier discussions regarding possible development of this site identified that a lay-by on the development side of the road, footway improvements opposite and a pair of real time Screens are all required as there would likely be a lot of visitors from the main bus-using demographic. It may be acceptable without the lay-by providing a suitably safe on-carriageway stop can be created for northbound buses. The lay-by and footway works would be 278 conditions, and the screens would require a contribution of approximately £23,000 for the pair.

### Design and Heritage

- 8.27 In terms of designated heritage assets, the site is in the setting of Melton Conservation Area and a number of listed buildings. Particularly relevant are the three large Grade II listed buildings that sit within designed landscapes, Melton Lodge to the south, Foxboro Hall to the west and the St Audrey's Hospital site to the north. The designed landscapes surrounding these buildings make a substantial contribution to their significance; allowing the buildings to be appreciated within landscapes that were specifically designed to complement them and that have remained mostly unchanged in the intervening centuries.
- 8.28 The fact that these buildings sit within these clearly defined private grounds means that the wider landscape setting makes only a minor contribution to their significance. The application site lies within this wider landscape setting but the low building heights across the site combined with the vegetative screening maintaining a green edge means that the development is considered to have a neutral impact on the ability to appreciate the significance of these listed buildings in their setting. The immediate, designed landscapes surrounding the buildings which make such a significant contribution to their significance will be unaffected.
- 8.29 The Melton Conservation Area boundary was reviewed in 2019 and a large extension was added to the north-east incorporating The Old Rectory and its grounds and Tollgate Cottages on Yarmouth Road. The site immediately abuts the northern boundary of the Conservation Area. As paragraph 13.3 of the Melton Conservation Area Appraisal states 'Although a conservation area boundary represents a demarcation enclosing a special area of historic interest, changes immediately outside of it can still have a significant impact on character and appearance. The setting of the conservation area, therefore, has an intrinsic value that must be acknowledged in any proposals for change to it.'
- 8.30 The site is visually separated from the Conservation Area by the existing, dense, vegetation on the boundaries, particularly the disused quarry on the south eastern boundary. The

Conservation Area incorporates the open green space to the north of the village core with the landscapes surrounding Melton Lodge, Greylands and The Old Rectory all included. Therefore whilst the development is creating a new built up area separate to the village core it is not considered that this will have a negative impact on the character of the Conservation Area as the green buffer to the north of the village is still protected, alongside the historic buildings in the core of the village.

### Design

- 8.31 Following comments made by the Council's Design and Conservation Team to the original proposal, a number of changes have been made to the scheme compared to that originally submitted. This includes the reduction in number of bungalows from 75 to 72, changes in the layout resulting in the club house facility being more centrally located and therefore providing more of a focal point for the development and changes in the layout of the bungalows such that they now respond better to the main access routes within the site. In relation to concerns over the number of parking courts, changes have been made such that these are reduced, more bungalows have 'on-plot' parking and the parking spaces have been allocated to each bungalow. This results in a better relationship between the properties and their respective parking spaces and also aids security.
- 8.32 In relation to the design, the plan form of the proposed care home has been retained which is supported as this keeps the bulk of the building to a minimum and ensures that the main rooms within the home all have adequate outlook. The design of the elevations has also been simplified such that it reads as a care home and does not try to re-create or include any other design features on what is an isolated development in terms of its design function.
- 8.33 While the bungalows remain of a similar design and appearance, there is more variety in their design, layout and appearance. This includes the addition of Almshouse style properties in terraces of varying lengths. This also helps to create character areas within the site to aid with orientation and includes elements of dementia friendly design.
- 8.34 Concern was also raised regarding the lack of any private curtilage spaces which would help provide security to the properties. While it is acknowledged that the concept of the development is to provide a community and open spaces will aid social interaction, the defining boundary features do not have to be 'hard' boundaries or tall however some demarcation to define private, defensible space is welcomed.
- 8.35 The layout has also been amended to provide a softer edge to the countryside along the western site boundary. This includes increasing the distance between the dwellings and the boundary resulting in more space for planting, having some of the properties face out towards the countryside and having a more staggered building line.
- 8.36 While some improvements have been made to the design and layout of the site internally, this does not overcome the greater concern that is the lack of connectivity between the site and the existing community. While connections and links within and throughout the site are good, the only access in and out of the site is via the main highway access. As detailed above, the distance from the site to Melton combined with the undesirable nature of the access, combined with the demographic of the residents, make it unlikely

that residents, staff or visitors would access the existing 'community' other than by car. This also means that residents are likely to travel further afield.

- 8.37 Although there is conflicting information in the application regarding use of the site - particularly in relation to the club house and bowling green (with the Transport Assessment stating that the cafe and club house would not generate any external trips, whereas the Planning Statement section 5.14 stating that the club house would become a vibrant community hub open to the public), it is considered that its main function is to provide a private, secure, gated community for its residents. The limited access into the site for the wider population would mean that it is unlikely that it will assimilate into the wider community in the village of Melton. The use and design of the scheme seem to be intentionally self-isolated and cut off from the surrounding community. It therefore lacks physical and social cohesion to the existing community which is poor design.
- 8.38 The site will be mostly screened from the main road by existing vegetation which will only be removed around the site entrance. Further planting is also proposed at the entrance. This means that the site does not interact with the existing street scene in any meaningful way. The development has been designed as a self-contained, gated community due to the nature of the accommodation provided and therefore the character of the site will mainly be informed by the design of the buildings within it and the green spaces surrounding it.
- 8.39 There is good open space provision throughout the site with an informal open green space to the south-east and more formal green spaces spread throughout. The idea of 'destinations' spread throughout the site to encourage movement around the site is a good one but in order for this to function effectively, it is suggested that these spaces are designed with a specific purpose or function such as a community garden.

#### Landscape

- 8.40 The Suffolk Landscape Character Assessment places the site in landscape character type LCT 4 - Ancient Rolling Farmlands, which recommends that planning for future village expansion should carefully aim to retain character and settlement patterns. The Suffolk Coastal Landscape Character Assessment places the site in the N1 LCA Boulge Park and Bredfield Rolling Farmland, the description of which contains the following key characteristics:
- \* Gently rolling farmland that wraps around the east and north sides of Woodbridge.
  - \* A scenic gently rolling arable landscape with a pleasant rural character.
  - \* The landscape is dominated by arable farming with scattered woodlands, with some areas of pasture. It is organised into regular medium sized fields within a generally intact network of hedges.
  - \* Sometimes inappropriate boundary treatments add a suburban touch but modern development has limited impact.
  - \* Away from the urban area and infrastructure, the landscape feels more peaceful.
- The gently undulating topography and well vegetated enclosure networks, make for a pleasant rural character.

8.41 Included in the Strategy Objectives for this LCA are:

- \* Protect the essentially undeveloped rural character of the area.
- \* Plan future expansion of any villages carefully to retain character and settlement patterns.

8.42 Allied to the Suffolk Coastal Landscape Character Assessment is the Suffolk Coastal Settlement Fringe Study. This study places the site in study area ML2. This notes that historic expansion of Melton as a settlement in a northerly direction was constrained by the sloping valley sides and by the parkland around Melton Lodge. Specifically, for peripheral area ML2, it is noted that the open valley sides are highly sensitive to development due to their visibility from the wider landscape. It is further noted that Periphery Area ML2 maintains a gap between Melton and Ufford which is recorded as being important for both formal and informal recreation.

8.43 The LVIA lists a number of landscape elements of the locality that may be considered atypical of the prevailing described landscape character. These include the adjacent residential curtilage boundaries to the south, the golf courses to north and east, and horse paddocks and other 'urban fringe' land uses such as mown lawns, post and rail fencing and the nearby hotel and spa. Aspects of these are described as diminishing of rural character. It is not considered that golf courses should be considered exclusively within the urban fringe character, when there are many golf courses in a clearly rural location and which have strong landscape character affinity with their surroundings through their tree cover. In the case of the courses to the north and east of this site, it can equally be argued that they have a parkland character which is typical of the locality. The course to the east is located in the former Ufford parkland landscape, and to the south there is the parkland attached to Melton Lodge. Overall these parkland character golf courses and the medium to small scale arable fields in the locality are typical and characteristic of the locality and landscape character type. It is also a landscape that provides a setting to the Melton Conservation Area to the immediate south, and a valuable rural green separation between Melton to the south and Ufford to the north.

8.44 The association and role as providing a setting to the Melton Conservation Area is downplayed in the LVIA because of a claimed lack of inter-visibility between the two, but that assessment takes no real account of the perception of change in the landscape set against an expectation that the landscape is and should be of rural character on travelling north away from Melton. The substantial loss of road frontage vegetation to achieve the required visibility splays will greatly increase the presence of the development in the landscape and it will be some years before any planting mitigation matures enough to reverse that perception. The fact the site falls within a landscape that is important for the role that it plays in maintaining rural separation between settlements, and which provides a rural farmed landscape setting to the Melton Conservation Area means it can be considered to have higher value than the Medium value given in the LVIA.

8.45 It is not considered that the site is influenced by urban fringe land use and its role in establishing rural green landscape character between Melton and Ufford is regarded as being of great importance and very much worthy of being maintained as such. The Suffolk Coastal Landscape Sensitivity Study states that the key function of this locality is in maintaining the separation of Melton and Ufford. On that basis alone, it is considered to

have high susceptibility to change in landscape terms. Combining this assessment with the high value ascribed to the landscape, it must be considered to be a landscape of High sensitivity.

- 8.46 Impacts on the key features of the landscape include the loss of the majority of the road frontage hedge, some alterations to topography to achieve required levels and drainage elements, loss of farmland for which the claimed replacement with planted open green space cannot be regarded as equivalent, and the inclusion of multiple new built structures. Allowing for a High sensitivity rating (as opposed to the claimed Medium level in the LVIA), and a High magnitude of impact rather than the claimed Medium, the overall effect on landscape must be considered to be Major and adverse on completion of the development, and any moderation towards Medium over the following 15 years can only be dependent on the successful establishment of an appropriate and effective programme of mitigation planting.
- 8.47 Potential visual impacts are assessed from a range of view points in the surrounding locality. It goes on to suggest that surrounding vegetation including hedges and the small quarry copse offer a degree of visual containment, although equally there are gaps in this vegetation that allow views into the site, including from PROWs, it has to be accepted that in winter after autumn leaf fall, views of the site will be more significant than in summer. The relevance of this seasonal variation seems to have not been fully accounted for. Long distance views of the site are said to be limited and this is accepted. Also accepted is the conclusion that, for the most part visual impacts are largely restricted to receptors in the fairly immediate locality of the site. However the degree of impact will vary with season and in terms of moderation over time, will be wholly dependent on the success of the mitigation planting, both in terms of speed of establishment and appropriateness.
- 8.48 Overall, it is considered that the proposed development will:
- \* result in a Major adverse effect on landscape character in the local area,
  - \* result in the erosion of the valued rural separation of Melton and Ufford and which provides a rural setting to the parkland element of the Melton Conservation Area,
  - \* erode visual amenity for visual receptors on the PROW network around the site to a greater degree than has been described in the LVIA.
- 8.49 The proposed development is therefore considered to be contrary to local plan policies SCLP10.4: Landscape Character and SCLP10.5: Settlement Coalescence.

#### Ecology - Protected Species and UK Priority Species

- 8.50 The assessment of impacts on protected species and UK Priority species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)) is presented in the Extended Phase 1 Habitat Survey report (Cotswold Wildlife Surveys, March 2019) and is based on site visits undertaken in 2014 and 2015 and updated in 2019. The conclusions of the report appear to be based on the previous development proposed at the site (report section 1.3), although as the current proposal is for a smaller development it is not considered that that this has a significant bearing on the information provided with two exceptions. Firstly, there is reference in the Phase 1 report to the partial infilling of the onsite pit. The pit is of local biodiversity importance and should therefore be retained and appropriately protected from any development (both during construction and occupation).

Secondly, the existing block plan (1470-A-PL02) shows a pond present on the northern boundary of the site, and it is also shown on the proposed layout plan, however the Phase 1 report does not identify its presence. It should be confirmed whether this pond is extant and if so whether it has any suitability for protected or UK Priority species.

- 8.51 The site is predominantly comprised of arable land which is of relatively low biodiversity value, however features of greater value are present including the wooded pit on the eastern boundary and the trees and hedgerows on the northern, southern and eastern boundaries. Whilst the proposed layout plan for the site shows these features to be largely retained, with the exception of some hedgerow removal to create the site access, there is a risk that they could be impacted by the development indirectly. In particular, impacts from external lighting could have an adverse impact on nocturnal species such as bats. These features will provide foraging and commuting habitat for the bats, as well as also containing some suitable roosting features as identified in the Phase 1 report.
- 8.52 The amended layout plan which protects the existing pit is welcomed, as is the proposed additional landscaping to buffer Jew's Lane. The updated site layout plans show a new pond is proposed to be created to the west of the centre of the site. Whilst the creation of such features can be of benefit to biodiversity, no details on the feature or why it is positioned in this location have been provided. It is shown surrounded on all sides by new dwellings (plots 32 to 45) and a footpath which will restrict its value for wildlife and it is not clear whether it is proposed to have a SUDS function or whether it is intended as a wildlife or ornamental feature.
- 8.53 The range of impacts identified within the submitted HRA are accepted. In particular, the development has the potential to result in an increased number of visitors to the Deben Estuary SPA and Ramsar site which could increase the recreational disturbance pressures on the site, in-combination with other residential developments. The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) provides a mechanism for the mitigation of these impacts, through both a financial contribution to the strategy to fund strategic works and the delivery of onsite mitigation measures, including the provision of onsite public greenspace and connections to the local public rights of way network. In relation to the appropriate financial contribution, given the nature of the proposed development it is considered that this should be calculated based on the number assisted living bungalows proposed. For this purpose, the site is within Suffolk Coast RAMS zone of influence Zone B which equates to a contribution of £24,091.50 (75 dwellings x £321.22 per dwelling).
- 8.54 With regard to the provision of onsite mitigation measures, the Proposed Layout Plan (drawing ref. P20-1638\_01 Rev. A) shows the provision of an area of public greenspace as part of the proposed development, along with an area of formal public garden. No specific connections to the existing local public rights of way network appear to be proposed as part of the development, although a connection to the footpath (Footpath 5) along Jew's Lane is present just to the north of the site. An HRA record has been completed and is currently with Natural England for their consideration in accordance with the requirements of the Conservation of Habitats and Species Regulations (2017) (as amended). If the above measures are not secured, the application would be contrary to Policy SCLP10.1 of the Suffolk Coastal Local Plan due to the potential adverse impact on the integrity of protected European sites, in combination with other development.

## Affordable Housing

- 8.55 Policy SCLP5.10 relating to affordable housing on residential developments states that "proposals for residential development with capacity for ten units or more or sites of 0.5ha or more will be expected to make provision for 1 in 3 units to be affordable dwellings..." While the care home is not affected by this policy, the proposed bungalows would constitute 'residential development' (with a capacity for more than ten units) to which this policy applies. It is therefore considered that the application proposal is required to provide a policy compliant level of affordable housing on the site (as no viability assessment has been submitted to justify a departure from this) which would result in the need for 24 of the proposed bungalows and/or Almshouses to be provided in an affordable form. This view has been confirmed by the Courts recently in the decision of Holgate J in Rectory Homes Limited v Secretary of State for Housing, Communities and Local Government. This decision confirms that unless the development plan policy for affordable housing expressly refers to C2 or C3 Use Classes, whether a development properly falls within C2 or C3 is not determinative of whether or not affordable housing needs to be provided. In that case, the policy requirement related to the provision of 'dwellings' and it was considered that whilst the Use Class was considered to be C2, the application did propose 'dwellings' and as a such, a proportion were required to be 'affordable'. In this case, the policy requirement for affordable housing relates to 'residential developments' which is considered to be a broader term than 'dwellings' and therefore would encompass the proposed bungalows and Almshouses. The application therefore fails to provide the required affordable housing requirement and is contrary to SCLP5.10 of the Local Plan and paragraph 64 of the NPPF.

## Health care

- 8.56 The NHS Ipswich and East Suffolk Clinical Commissioning Group (CCG) has raised concerns with capacity in the local primary health care network.
- 8.57 The location of the development is covered by a group of local practices called a Primary Care Network. These practices do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a decision has been made between the CCG and PCN to object to the proposal because of the following reasons:
- The area already consists of seven care facilities (care homes and sheltered accommodation) with a dementia unit already approved.
  - Facilities of this nature do not just cater for the local population but will attract people of the elderly demographic to the area and increase the workload for the surgeries in the PCN which are already struggling to deal with overall demand.
  - A development of this size should be located where the infrastructure is in place and not in an area in which a high concentration of care homes and accommodation for the elderly and infirm already exist.
  - The proposal would put undue stress on local healthcare provision of which could result in practices closing their lists to new patients just to be able to deal with extra demand.
  - Lists shutting would see the new population coming into residential developments currently approved requiring registering further afield than currently practiced.

- 8.58 The CCG is in ongoing discussions with the developer to look at if the impact on primary care in the area can be mitigated. Any update on this by the date of the meeting will be reported in the updates sheet.

#### Surface Water Drainage (SUDS)

- 8.59 Suffolk County Council as Lead Local Flood Authority has considered the WSP Flood Risk Assessment and Drainage Strategy. They recommend a holding objection.
- 8.60 The submitted Flood Risk Assessment proposes to discharge surface water via infiltration. However, the information provided within the borehole logs determines that clay is present across the site, providing the necessity for deep infiltration (greater than 2m below existing ground levels). The choice of runoff destination should adhere to the hierarchy outlined within Appendix A of the Suffolk Flood Risk Management Strategy and clear justification should be presented to support any proposed deviation. Deep infiltration is at the bottom of the hierarchy and should only be considered in the event that no other option is feasible.
- 8.61 The above point must be overcome as it is not acceptable to utilise deep infiltration, which is bottom of the hierarchy, without first exploring all other options. However, if deep infiltration is clearly justified - once all other destination options have been explored - and agreed in principle, written permission from the Environmental Agency should be sought and submitted to the Local Planning Authority given the site is situated within Source Protection Zone Three.
- 8.62 If deep infiltration is considered appropriate, there are still some alterations which are required to the drainage strategy to satisfy additional concerns. The invert level of the SUDS features should be at the same invert level of the soakage tests to ensure that the infiltration rate is an accurate representation for each of the SUDS components. If invert levels are proposed at different depths to what has been tested, further testing in accordance with BRE365 may be required to justify a suitable infiltration rate.
- 8.63 There has been minimal information provided for the design of the basin, geo-cellular storage system and permeable paving system. It is therefore unclear as to whether the design for each feature adheres to national and local standards, and if the appropriate safety factor has been applied. Dimensioned plans for each of the proposed SUDS components should be submitted for review.
- 8.64 Full hydraulic Network calculations should be provided with a full application, denoting how runoff is conveyed and if the system is acceptable. With the information currently available it is unclear how runoff will be conveyed from source to the proposed outfall. Additionally, it cannot be clarified that the network will not flood during a flood event, nor who or what may be impacted as a result. MicroDrainage Network calculations should be submitted for 1:1, 1:30 year and 1:100 year +40% climate change events.
- 8.65 It appears that the geo-cellular system has been included within the design simply to reduce the space required to manage runoff. There has been no justification provided to suggest that an open system is not suitable and lack of space is not considered as sufficient reasoning as this could have been avoided if early consideration was given to the implementation of SUDS.



- 8.66 There has been no indication of exceedance routes associated with the proposed basin situated at the Southern border of the site. This presents concerns of possible flooding to the existing properties situated adjacent to the border and further mitigation may be required to prevent this from occurring. Additionally, exceedance routes associated with the proposed geo-cellular system should be included due to concerns of possible flooding to the existing properties situated on the Northern border of the site.
- 8.67 The details provided in Drawing No. 67429-D-001 illustrate two areas situated within the Eastern side of the site which are denoted as the same colour as the proposed basin. However, those same areas are denoted as open green space within the proposed layout plan. It is therefore unclear to determine if these areas are intended for open green space or additional basins.
- 8.68 The submitted Flood Risk Assessment proposes to discharge surface water via infiltration however it may be necessary due to clay being present to use deep infiltration however this has not been justified. Insufficient information has also been provided for the design of the drainage basin, geo-cellular storage system and permeable paving system. It is therefore unclear as to whether the design for each feature adheres to national and local standards, and if the appropriate safety factor has been applied. The proposal is therefore contrary to SCLP9.6 of the Local Plan.

#### Sustainable Construction

- 8.69 The Design and Access Statement submitted with the planning application (page 29) refers to the use of energy efficient building techniques and page 48 refers to measures such as orientating the buildings to maximise solar gain and considering renewable energy. Policy SCLP9.2 'Sustainable Construction' in the Local Plan sets out that all new developments of more than ten dwellings should achieve a 20% reduction in CO2 emissions below the target CO2 emissions set in the Building Regulations. Policy SCLP9.2 would expect all new residential development to achieve water efficiency of 110 litres per person a day. It is considered likely that the types of use proposed could be more energy demanding than non-specialist dwellings and therefore it would be expected that careful attention would be paid to reducing potential energy use under adopted and emerging policies.

#### Community Infrastructure Levy (CIL)

- 8.70 It is noted that the Planning Statement submitted with the application states that the whole of the development is C2. CIL is chargeable on development of C3/C4 and convenience retail. Therefore, as the development has been identified as being wholly C2 then it will not be liable for CIL. However, if the assisted care bungalows were to fall under Class C3, then they would be liable for CIL.
- 8.71 The proposed development is located within the High Zone at £150/sqm (for a full permission granted in 2021 the CIL rate is £192.86/sqm. If the development is liable for CIL, the CIL process will need to be followed prior to commencement of development in order to remain eligible for the relief.

## **9. Conclusion**

- 9.1 The application site is located in the countryside, detached from services and facilities. This detachment and the poor pedestrian links to access services and facilities in Melton results in an unsustainable location for development whereby residents, staff and visitors would be reliant on use of the private motor vehicle to access the site. This is contrary to the development plan which seeks to locate development within defined settlement boundaries and plans for sustainable growth and contrary to the principles of environmental sustainability which seek to protect the natural environment, reduce pollution and the use of natural resources. The application is therefore contrary to the NPPF which seeks to promote plan-led, sustainable development and SCLP3.2 and SCLP3.3 of the Local Plan and MEL1 of the Melton Neighbourhood Plan which seek to locate new development within existing settlements.
- 9.2 Inadequate pedestrian and cycling provision is available between the application site and local amenities and transport links, particularly for vulnerable road users given narrow pavements and requirement to cross Yarmouth Road without adequate crossing facilities. The proposal therefore does not accord with paragraphs 108 and 110 of the NPPF or SCLP7.1 of the Local Plan.
- 9.3 The proposed development would also have a major adverse impact on landscape character in the local area, erode the separation of Melton and Ufford which contributes to the setting of the Melton Conservation Area and erode visual amenity for visual receptors on the local public rights of way network. The proposal is therefore contrary to Policies SCLP10.4 and SCLP10.5.
- 9.4 Insufficient information has been provided to enable the local planning authority (as competent authority) to complete a Habitats Regulations Assessment (HRA) as insufficient and out of date information has been provided. The proposal is therefore contrary to SCLP10.1 which seeks to ensure that developments maintain, restores or enhances biodiversity and that the integrity of protected sites are not compromised.
- 9.5 The development would not provide for the required mix of dwelling sizes nor would it provide any affordable housing on the site. The proposal would therefore be contrary to SCLP5.8 and SCLP5.10 which seek to provide a mix of dwelling sizes to meet the identified need and to provide one in three dwellings in an affordable form, again to meet the identified need.

## **Recommendation**

That planning permission be refused for the following reasons:

1. The application proposes the development of a care home and 72 assisted care bungalows with associated infrastructure falling within Class C2 of the Town and Country Planning (Use Classes) Order (1987). The site is located within the Parish of Melton, approximately 750 metres north of the defined physical limits boundary.

The application site is therefore located in the countryside. Policy MEL1 of the Melton Neighbourhood Plan (made January 2018) seeks to focus development within the defined

physical limits boundary and does not support development outside of this unless the development would be in accordance with a Local Plan Policy relating to appropriate uses within the countryside or where it proposes necessary utility infrastructure. The Local Plan supports this position aiming to deliver development that reflects the character of the area and contributes towards sustainable development.

The location of the application site, outside of and detached from the defined physical limits boundary of Melton is therefore contrary to Policy MEL1 of the Melton Neighbourhood Plan and SCLP3.2 and SCLP3.3 of the East Suffolk Council - Suffolk Coastal Local Plan (September 2020).

2. The location of the application site, detached from the centre of Melton and therefore the services and facilities provided within the settlement results in an unsustainable location for development. This is due to the distance from these services and facilities in Melton village and the undesirable connections to the site for pedestrians and cyclists. The footpath connection between the site and village is narrow and uneven with limited lighting and pedestrians would be forced to cross Yarmouth Road with no crossing facilities. These factors make it particularly undesirable for vulnerable road users. For cyclists, the unlit route and hill would make the journey difficult and undesirable. The Local Plan seeks to encourage development in locations where people can easily access services and facilities and where there is a choice of transport modes including walking, cycling and public transport.

The proposal is therefore contrary to paragraphs 108 and 110 of the National Planning Policy Framework which seeks to ensure appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location, give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas and address the needs of people with disabilities and reduced mobility in relation to all modes of transport. It is also contrary to Policy SCLP7.1 of the East Suffolk Council - Suffolk Coastal Local Plan (September 2020) which requires development to provide safe pedestrian and cycle access to services and facilities.

3. The proposed development would be located on an undeveloped site that falls within the Ancient Rolling Farmlands, which recommends that planning for future village expansion should carefully aim to retain character and settlement patterns. The site, and surrounding farmland around the east and north of Woodbridge is identified as having a pleasant rural character. Development of the site for a care home and associated bungalows would result in a major adverse effect on landscape character in the local area, result in the erosion of the valued rural separation of Melton and Ufford and that which provides a rural setting to the parkland element of the Melton Conservation Area and erode visual amenity for visual receptors on the Public Rights of Way network around the site. The proposed development is therefore contrary to East Suffolk Council - East Suffolk Council Local Plan policies SCLP10.4: Landscape Character and SCLP10.5: Settlement Coalescence.
4. The application proposes residential development in the form of bungalows and Almshouses. Policy SCLP5.10 of the East Suffolk Council - Suffolk Coastal Local Plan requires that applications for residential development with capacity for ten units or more will be expected to make provision for 1 in 3 units to be affordable dwellings, and to be made available to meet an identified local need, including needs for affordable housing for

older people. The proposal does not make provision for any of the 72 units to be provided in an affordable form and therefore the proposal is contrary to SCLP5.10.

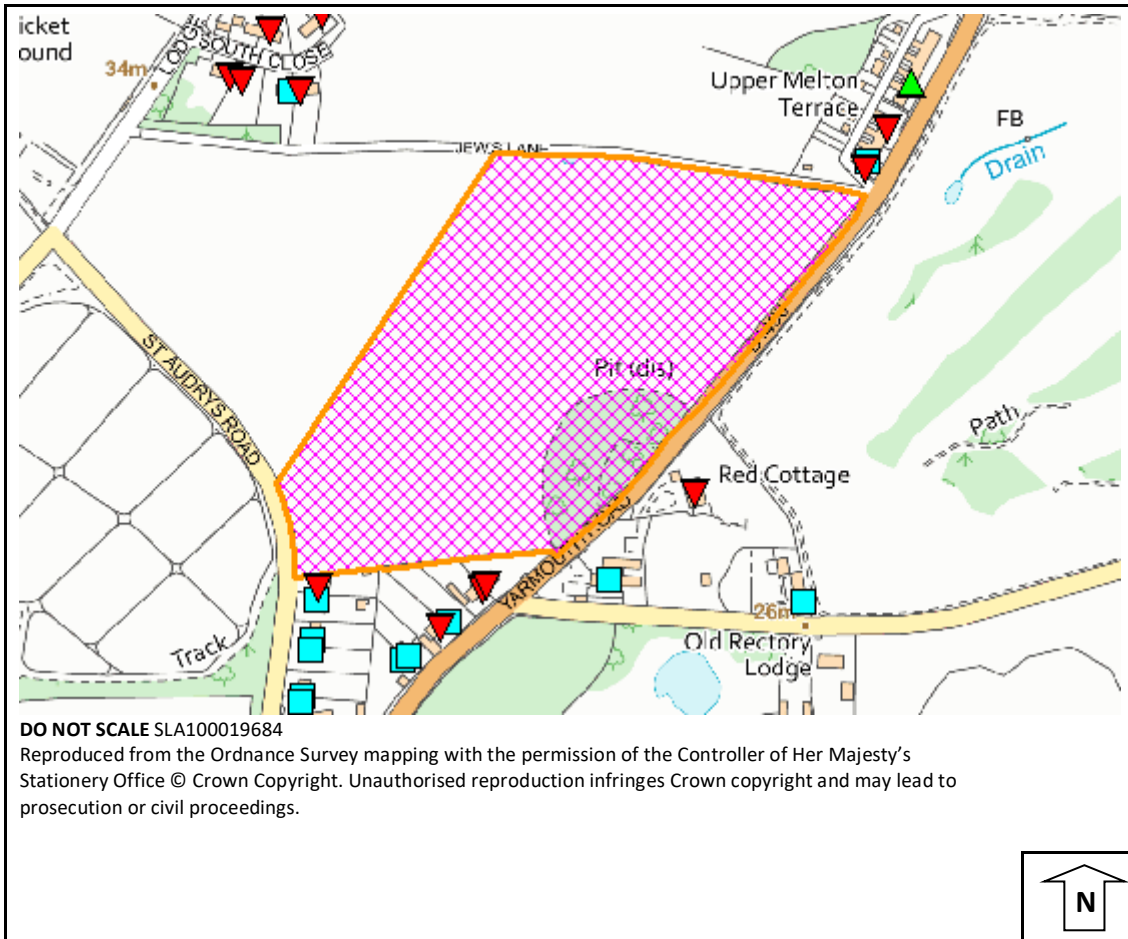
**Informatives:**

There are no informatives.

**Background information**

See application reference DC/20/1521/FUL on [Public Access](#)

# Map



## Key



Notified, no comments received



Objection



Representation



Support