

Item 6

DC/20/3326/OUT

Outline application with all matters reserved apart from access.

A phased development, including the erection of up to 49 custom/self-build homes (plots), with the development to include 16 affordable homes, public open space that will include equipped play and multi-use games area, landscaping, and other associated infrastructure

Land at Victoria Mill Road, Framlingham



Proposal

This is an **outline application with all matters reserved apart from access**, for a phased development for up to 49 custom/self-build homes (including 16 affordable homes), public open space that will include equipped play and multi-use games area, landscaping, and other associated infrastructure.

Access details include:

- Main site access from Victoria Mill Road;
- A pedestrian access from the site onto Victoria Mill Road, opposite the crescent; and
- Highway upgrades, including the re-alignment of Victoria Mill Road.

Outline application

As an outline application, the following details will be agreed at later stage under a reserved matters application:

- **Appearance:** Aspects of a building or place which affect the way it looks, including the exterior of the development.
- **Landscaping:** The improvement or protection of the amenities of the site and the area and the surrounding area, this could include planting trees or hedges as a screen.
- **Layout:** Includes buildings, routes and open spaces within the development and the way they are laid out in relations to buildings and spaces outside the development.
- **Scale:** Includes information on the size of the development, including the height, width and length of each proposed building.

Site context

The site comprises a parcel of land south of Victoria Mill Road with an overall area of approximately 2.6 hectares.

It currently forms Grade 2/3 agricultural land and is allocated within the Framlingham Neighbourhood Plan under Policy FRAM25 for the purpose of housing.



-  Planning boundary
-  Settlement area
-  Conservation Area

Site context

The surrounding environment comprises agricultural fields to the south, an area of grazing land to the west, and residential properties to north and east.

Topographically the site is relatively flat, sloping gently from north west to south east (average gradient 1:40).

It is located within Flood Zone 1 and a public right of way (Footpath 50) is located at the north-western corner of the site and continues south-westerly from Victoria Mill Road.



Site visit

The application was heard at Planning Committee on Tuesday 23 November 2021.

The item was deferred to allow Members of the Committee to undertake a site visit (held on Monday 6 December 2021).

This was deemed necessary in order to view the site in terms of its context with particular reference to the proposed road realignment and highway matters.



DC/20/3326/OUT – Land at Victoria Mill Road

**Planning Committee Site Visit
Monday 6 December**

*Meet at East Suffolk House at 9am or
in Framlingham at 9:30am*

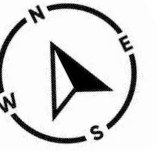
1. Meet at car park next to the petrol station at **9:30am**
2. View from Victoria Mill Road
3. View of 'pinch-point'
4. View of the crescent and site
5. View from public footpath
6. View along countryside edge
7. Possible pedestrian connection

Back to car park/end of site visit.

Site photos



Looking north east from Victoria Mill Road



Site photos



Looking east along Victoria Mill Road – site to the right

Site photos



Looking south from the north west corner of the site

Site photos



Looking south west from the north west corner of the site



Site photos



Looking north west from the north east corner of the site

Site photos

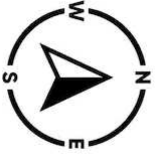


Looking west from the north east corner of the site

Site photos



Looking west from the north east corner of the site



Site photos



Looking south from the north west corner of the site

Site photos

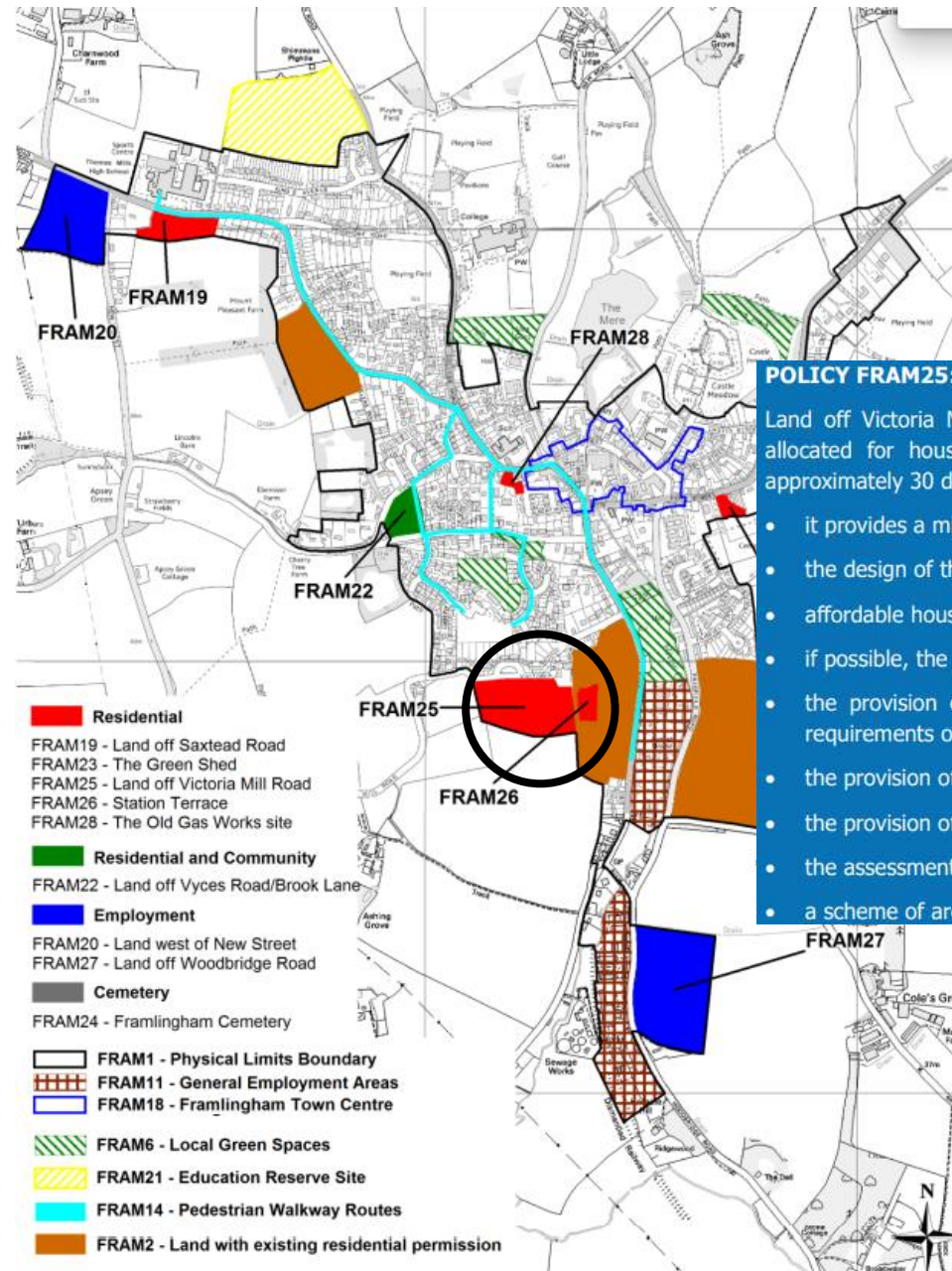


Looking south west from the north west corner of the site

Principle of development

The site is located within the settlement boundary for Framlingham and is identified within the neighbourhood plan as an allocated site for residential development

The principle of residential development on the site is therefore established



POLICY FRAM25: LAND OFF VICTORIA MILL ROAD

Land off Victoria Mill Road (approximately 2.6 hectares as identified on the Policies Map) is allocated for housing for the second half of the Plan period (after 2025); proposals for approximately 30 dwellings will be supported subject to the following criteria:

- it provides a mix of dwelling sizes in accordance with Policy FRAM3; and
- the design of the dwellings is in accordance with the requirements of Policy FRAM4; and
- affordable housing is provided to meet the requirements of Core Strategy Policy DM2; and
- if possible, the provision of a Neighbourhood Equipped Area for Play (NEAP); and
- the provision of publicly accessible green space within the site in accordance with the requirements of Strategic Policy SP16 of the Suffolk Coastal Local Plan; and
- the provision of appropriate vehicle access into the site from Victoria Mill Road; and
- the provision of appropriate pedestrian access in accordance with Policy FRAM14; and
- the assessment of traffic impacts in accordance with Policy FRAM16; and
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation.

Illustrative masterplan

The application addresses the principle of 'up to 49' custom/self-build homes (including 16 affordable homes); inclusion of public open space (including play provision); landscaping; and other associated infrastructure.

An illustrative masterplan and indicative phasing plan have been submitted demonstrating this detail.

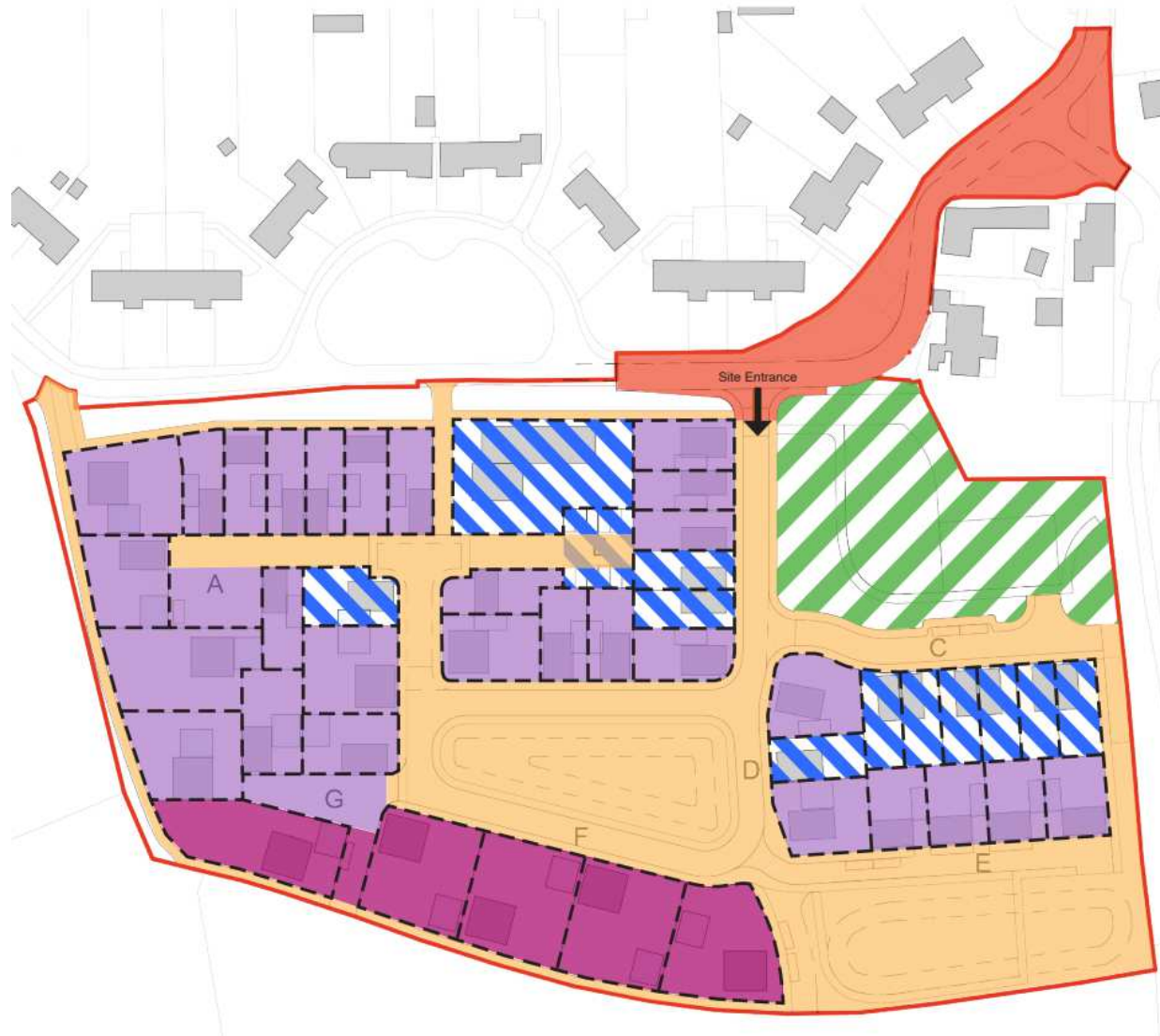


Illustrative masterplan



-  Planning boundary
-  Site boundary
-  Developable area
-  Access road
-  Indicative location of courtyard
-  Green open space
-  Detention basin / sustainable urban drainage
-  Pedestrian & Cycle route
-  Equipped play area & Ball Court
-  Root Protection Area
-  Existing Ditch
-  Offsite Highways Work
-  Flats
-  2 - bedroom house
-  3 - bedroom house
-  4 - bedroom house
-  Garage
-  Proposed hedge - 2m buffer
-  Potential area for underground attenuation

Indicative phasing plan



Phase 1:





-  Phase 1A Access Improvements along Victoria Mill Road (highway land) and entrance to site (bell-mouth)
-  Phase 1B Site preparation, provision of access roads, footpaths and all services / drainage infrastructure for distribution around each individual plot (details to be confirmed at Reserved Matters stages)
-  Phase 1C Open Space and Equipped Play Provision (to be designed at RM stages)

Highway works

Site preparation

Open space/play provision

Future phases:

-  - Indicative future affordable housing phases (delivered in line with S106 agreement)
-  - Indicative future self-build phases. All plots to be built out individually following Reserved Matters applications served on a plot by plot basis. The individual construction will run concurrently and not one at a time i.e. phases overlap
-  - Indicative future custom build future phases. All plots to be built out individually following Reserved Matters approval. Phases will overlap, with some sequencing due to infrastructure provision
-  - Developable plot boundary

Affordable housing

Self-build phases

Custom-build phases

View north towards the crescent



View south – showing relationship with the crescent



View west from Victoria Mill Road



View east from Victoria Mill Road



View of courtyard



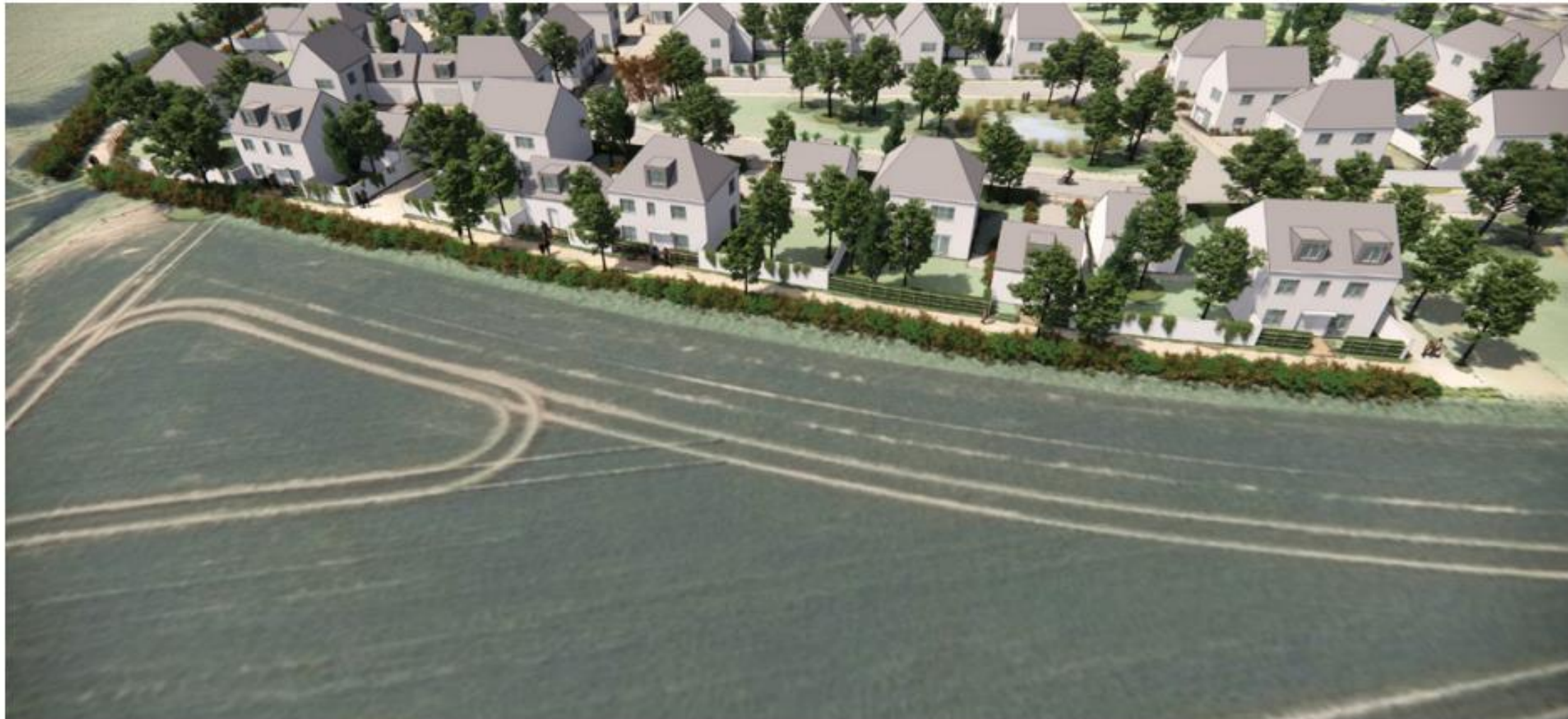
View south west from central green space



View north – countryside edge



View north - countryside edge



View north west – pedestrian/cycle route and hedgerow



Pedestrian/cycle route along perimeter



View into open/play space

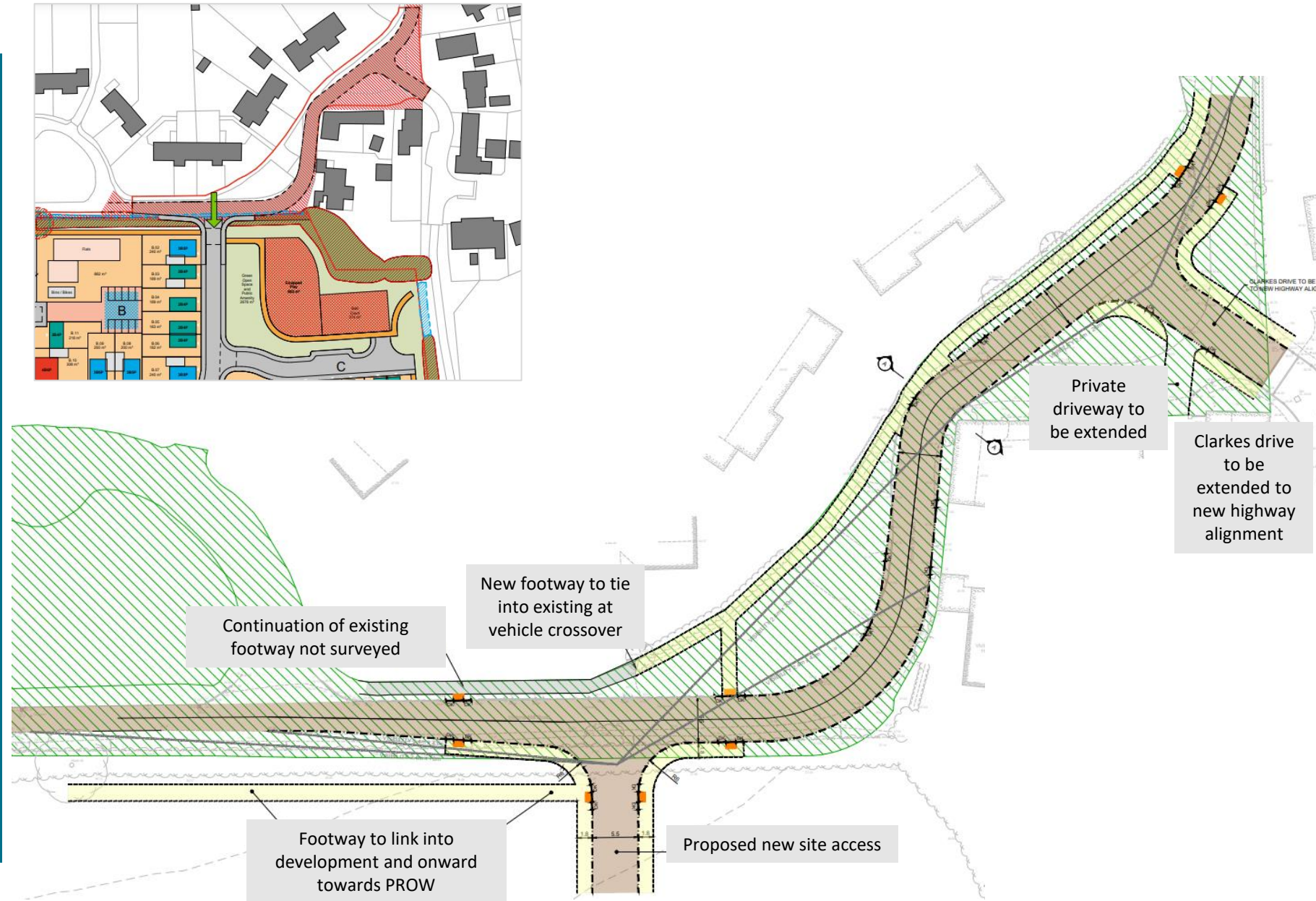


Highway works outside the site allocation

Proposed site entrance and junction plan

In order to achieve a safe and suitable access, re-alignment works to Victoria Mill Road are proposed outside the allocated boundary. These works include providing crossing points, new lengths of footway, and widening existing footway.

The proposals retain the existing hedgerows wherever possible – with some removed for necessary visibility splays.



Highway works

The current road layout is deemed adequate for the delivery of ‘approximately 30 dwellings’.

Framlingham Neighbourhood Plan para. 14.1 states **“The restriction on the number of dwellings for the site reflects the limitations placed on it by the need for access off Victoria Mill Road.”**

Therefore, the judgement is to be given on whether the access is suitable in principle and allows for ‘up to 49 dwellings’.

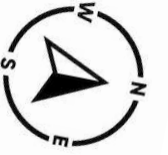
Five matters of consideration will be addressed in relation to these works:

- Highway extent and land ownership
- Road width
- Footway width at pinch-point
- Heritage impact
- Asset of Community Value nomination

Victoria Mill Road



Victoria Mill Road



Victoria Mill Road

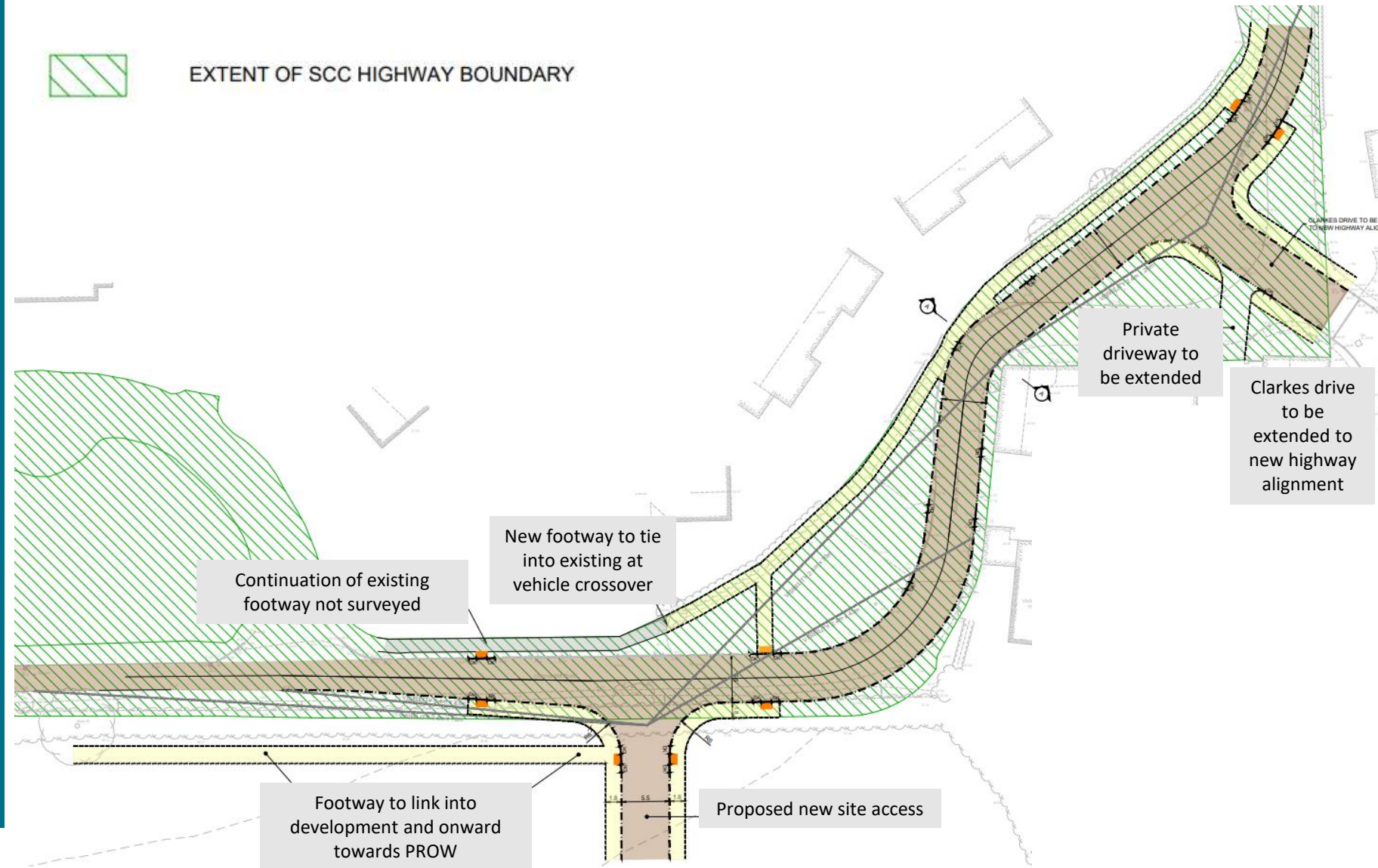


Highway extent

Consultation responses suggest that the road re-alignment works are not possible as the land falls within private ownership rather than within the highway extent.

The applicant has provided additional land registry details and has served notice on both affected parties: the highways authority and Flagship Housing.

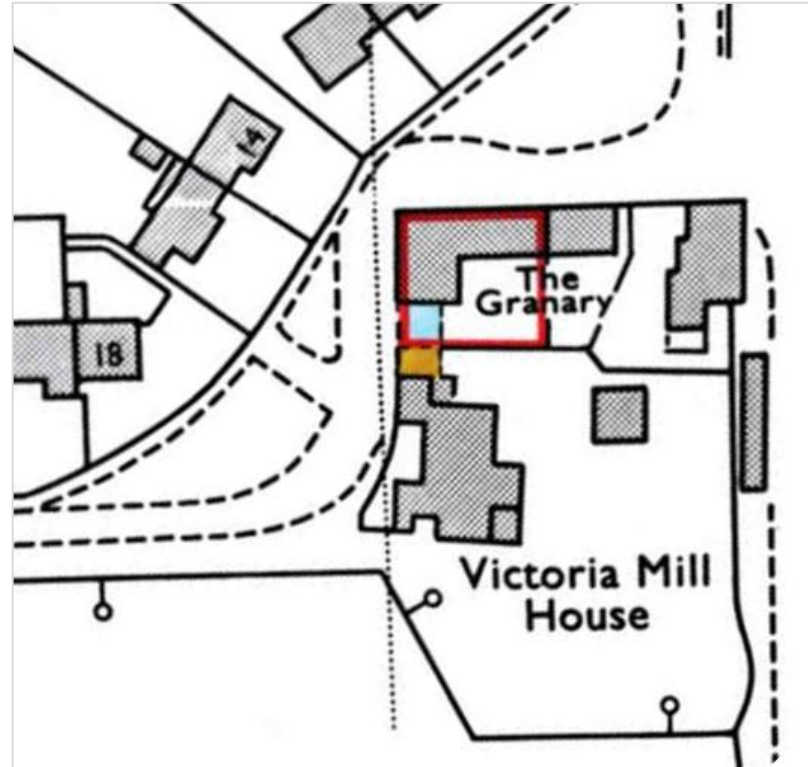
All proposed road realignment works fall within the current extent of the highway.



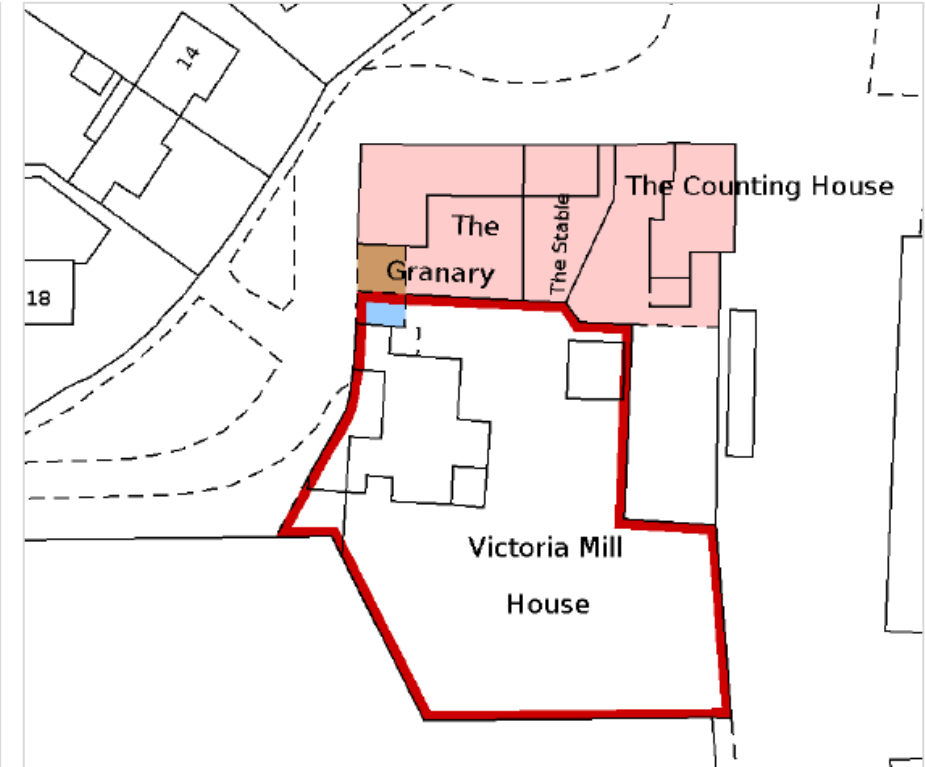
Land ownership

Neighbour responses noted that land within the realignment works falls within third-party ownership.

The Land Registry title plans for 'The Granary' and 'Victoria Mill House' demonstrates that this is not the case.



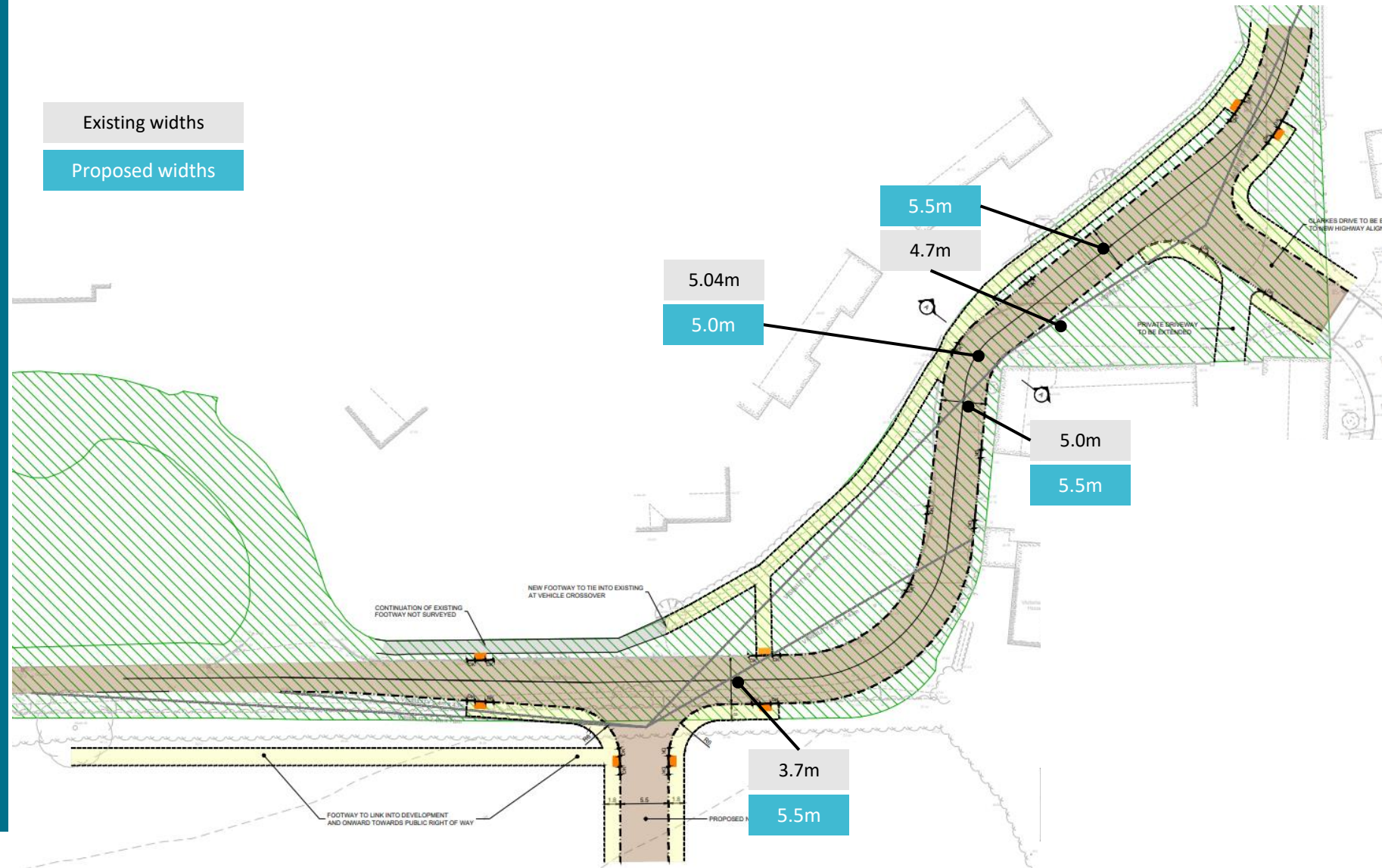
The Granary



Victoria Mill House

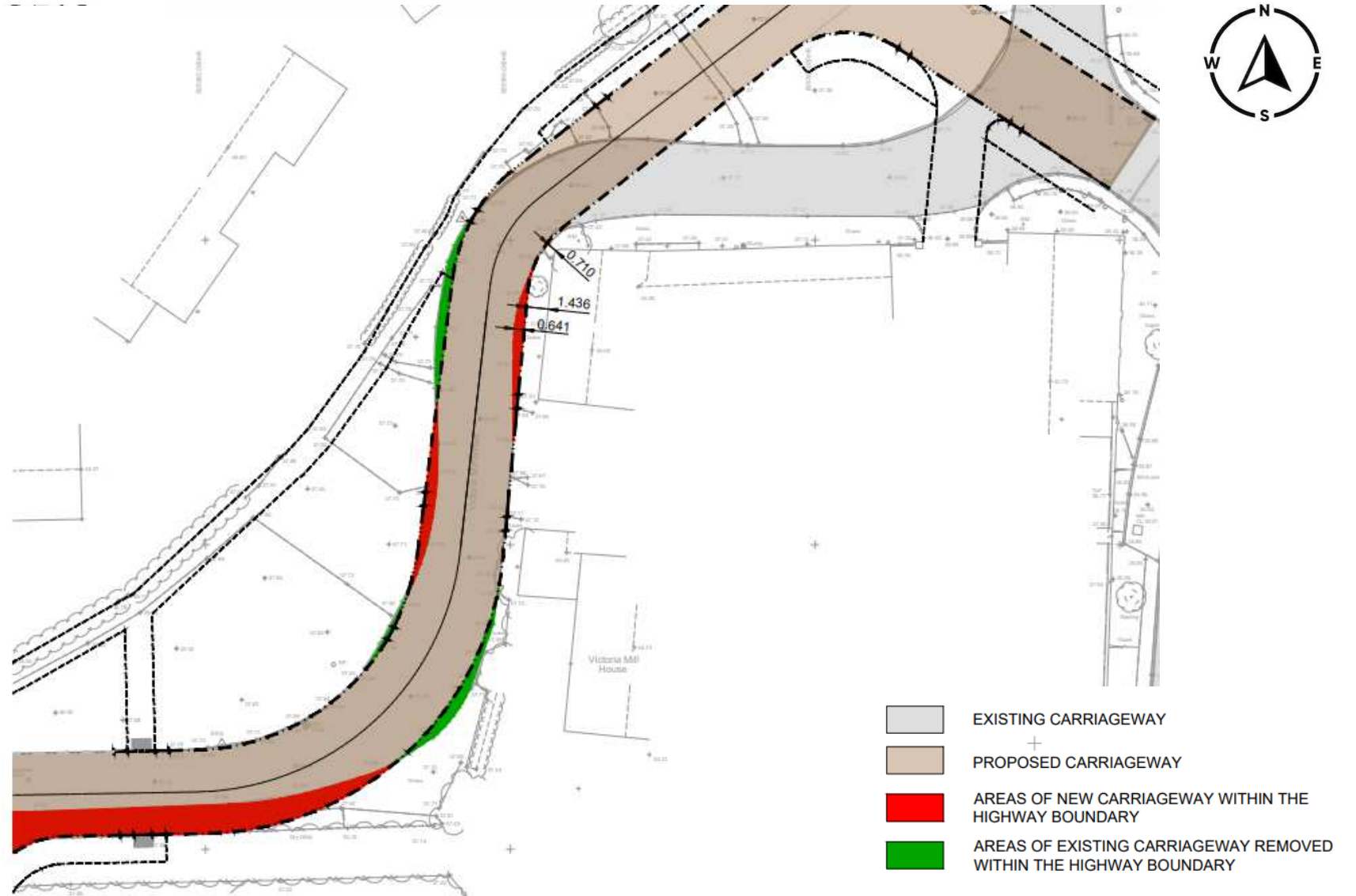
Road width

Given the traffic flows and existing widths on Victoria Mill Road, the highways authority consider that the five metre wide sections are acceptable.



Road width narrowing and widening

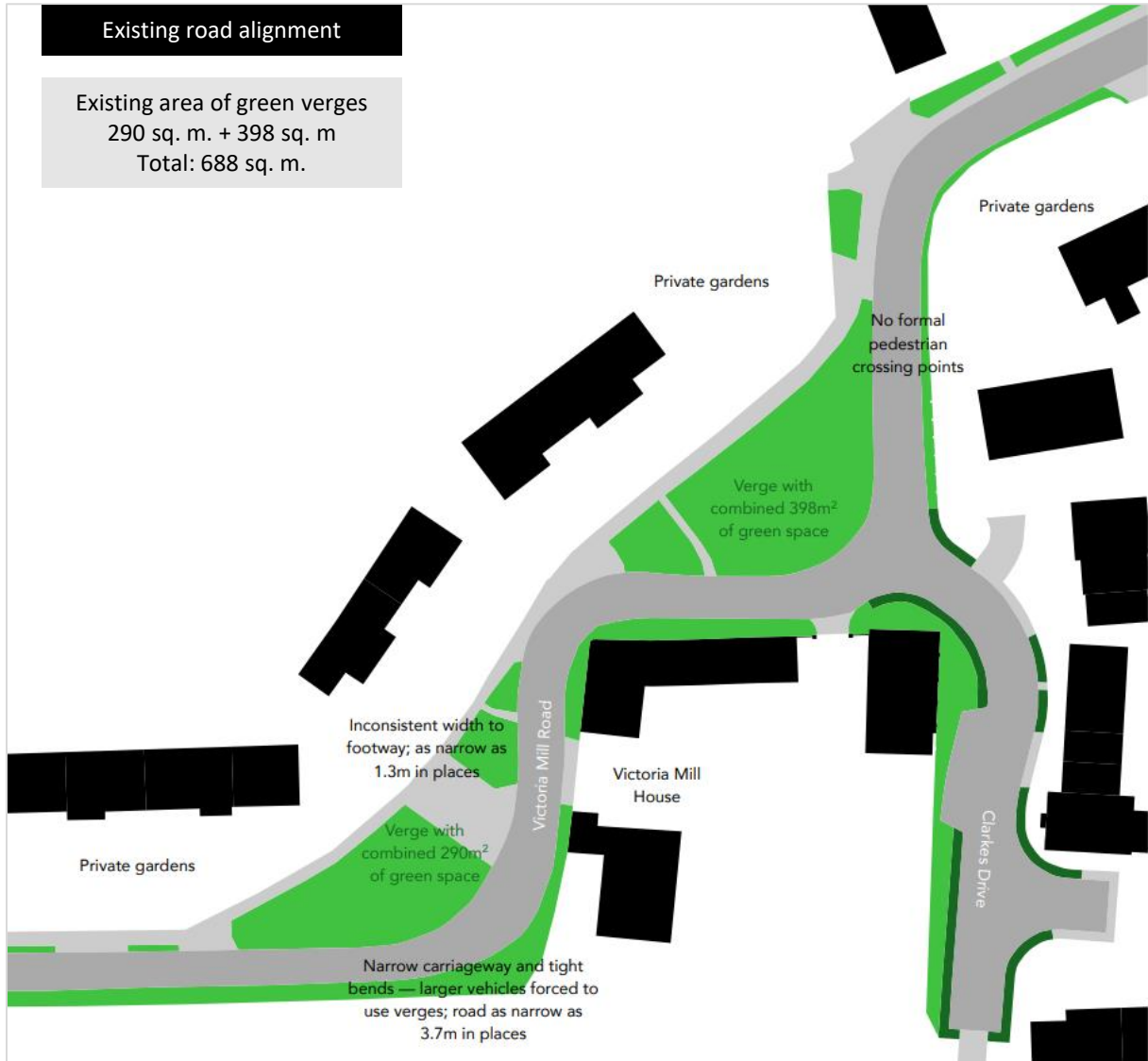
Areas of new carriageway within the highway boundary are shown in red and areas of existing carriageway to be removed shown in green.



Existing and proposed realignment

Existing road alignment

Existing area of green verges
290 sq. m. + 398 sq. m
Total: 688 sq. m.



Proposed re-alignment

Proposed area of green verges
261 sq. m. + 370 sq. m
Total: 631 sq. m.

**Overall loss of green verges
57 sq. m.**



Footway width at pinch-point

Manual for Streets indicates that there is no maximum width; in lightly used streets, such as those with a purely residential function, the minimum unobstructed width for pedestrians should generally be 2 metres. The highways authority has advised that the use of the word “generally” indicates that there are circumstances where exceptions might be made.

Government guidance on footways, footpaths and pedestrian areas in relation to inclusive mobility is summarised below:

- **Minimum clear width under normal circumstances: 2 metres**
- **Minimum width acceptable due to physical constraints: 1.5 metres**
- **The absolute minimum width where there is an obstacle: 1 metre***

**The maximum length of restricted width should be 6 metres (see also Section 8.3). If there are local restrictions or obstacles causing this sort of reduction in width, they should be grouped in a logical and regular pattern to assist visually impaired people.*

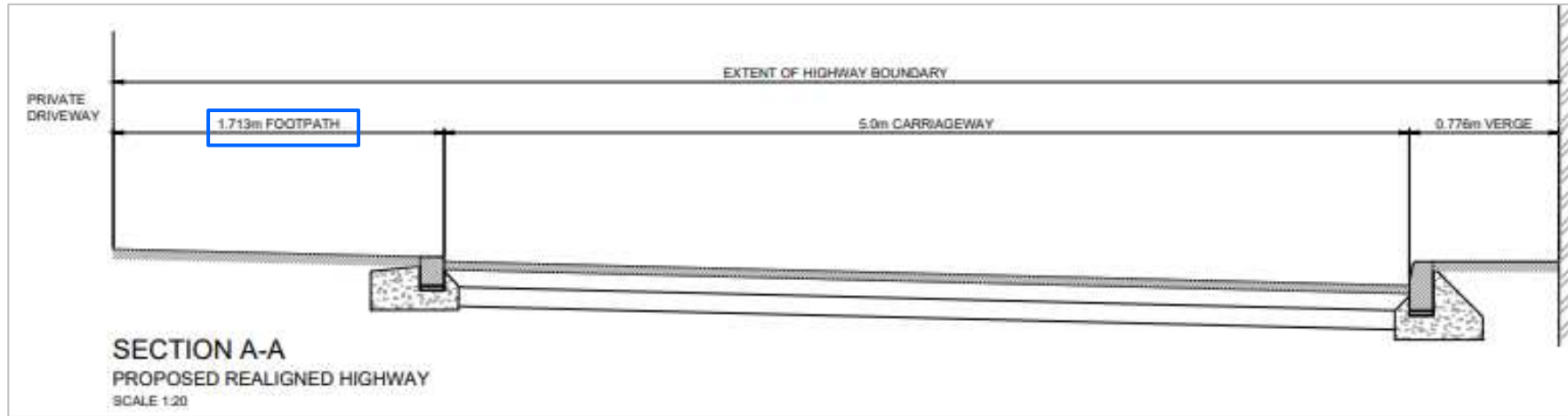
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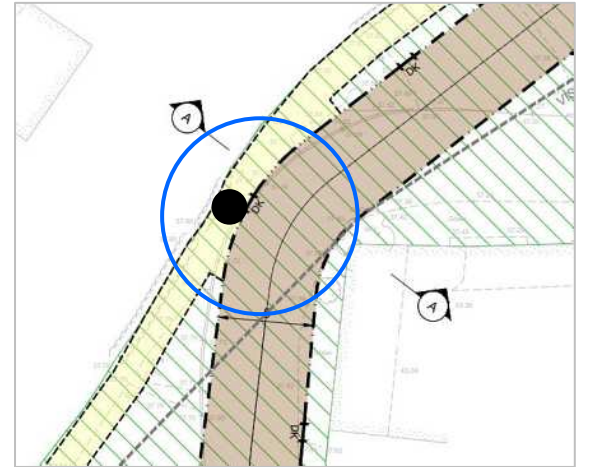
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Proposed pinch-point width



The width of the footway at the identified pinch point is **1.713 metres** and extends less than 6 metres in length.

The narrowest section of the footway is located further south of this indicator, measured at **1.5 metres**.

Heritage impact

Framlingham Town Council and third-party consultees have raised concern that the road realignment works would destroy the historic road layout and weaken its relationship with the adjacent heritage buildings.

Whilst the local planning authority's principal design and conservation officer considers it unfortunate that the historic dog-leg road pattern around the site of the former historic mill will be partly lost **no formal objection is raised.**

A planning condition is proposed to ensure archaeological assets within the development boundary are safeguarded.

Asset of Community Value (ACV) nomination

During the time the application was pending consideration, Framlingham Town Council submitted a nomination to list areas of green verges along Victoria Mill Road as an Asset of Community Value (ACV).

East Suffolk Council concluded that only one of the three nominated parcels (Area 1) of land meets the definition of an ACV.

A new application was recently received for Area 2 and Area 3 – pending determination, decision due by Monday 7 February.



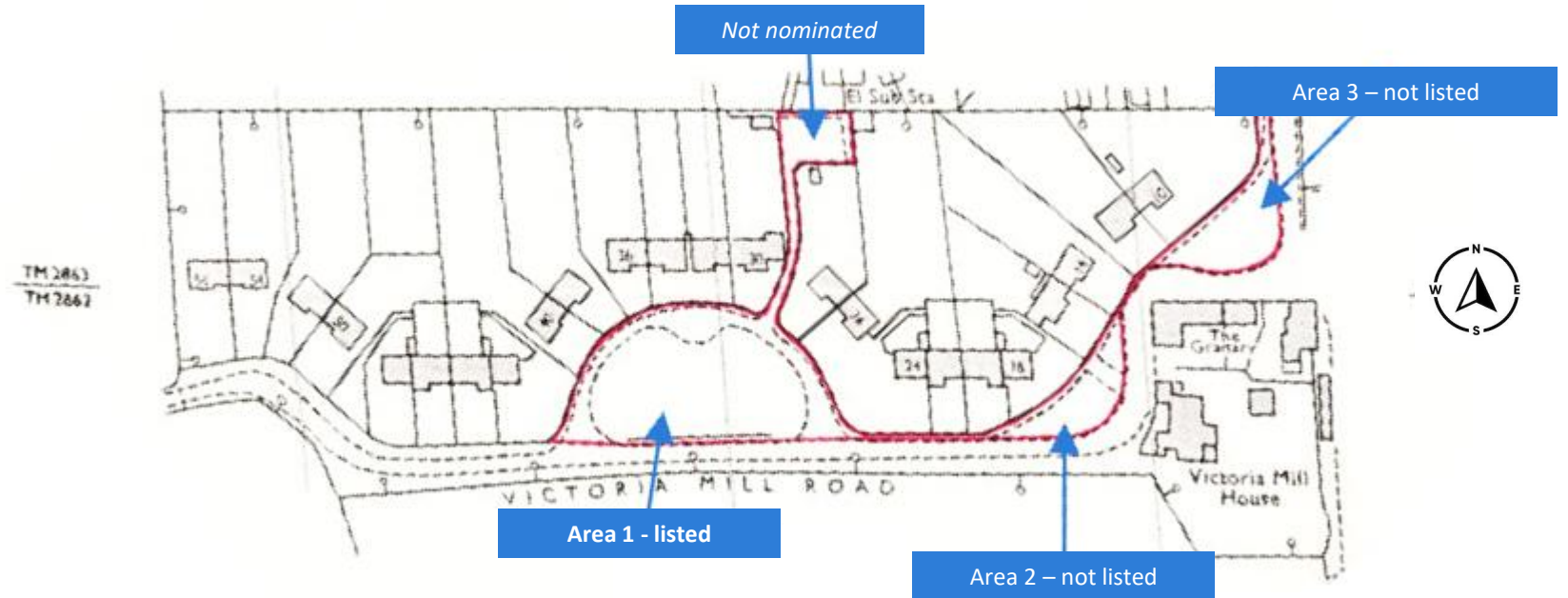
Area 1



Area 2

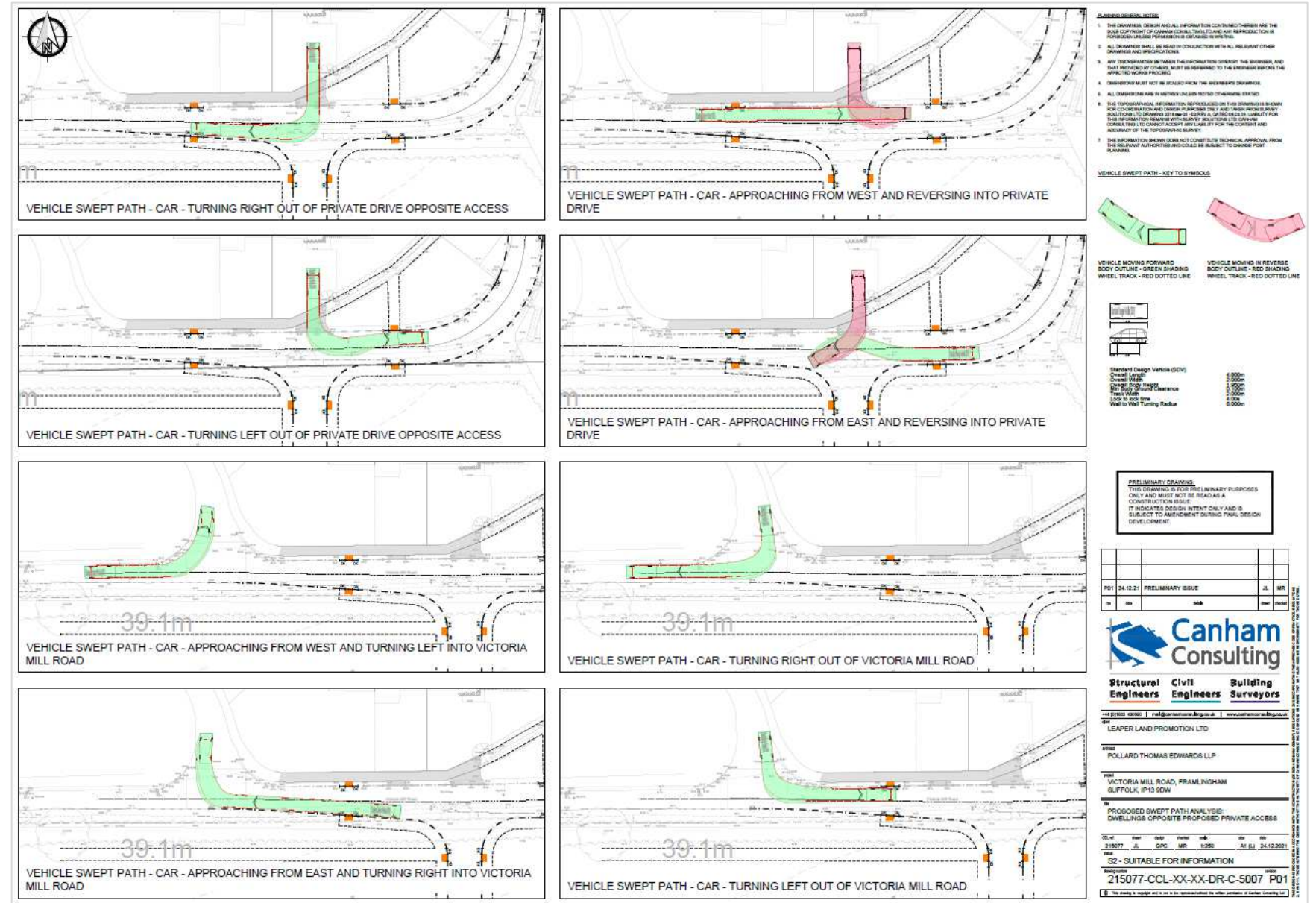


Area 3



Access from residential properties

Swept path analysis from existing properties submitted following concerns raised by members during the site visit – see drawing number 215077-CCL-XX-XX-DR-C-5007 Rev. P01.



Swept path analysis

Revised highway plans received in response to the concerns raised by objectors.

- 215077-CCL-XX-XX-DR-C-5008 Rev. P01: Proposed access swept path analysis: refuse vehicle.
- 215077-CCL-XX-XX-DR-C-5005 Rev. P02: Proposed access swept path analysis: Maximum legal articulated vehicle – Sheet 1.
- 215077-CCL-XX-XX-DR-C-5006 Rev. P02: Proposed access swept path analysis: Maximum legal articulated vehicle – Sheet 2.
- 215077-CCL-XX-XX-DR-C-5007 Rev. P0: Proposed swept path analysis: Dwellings opposite proposed private access.
- 215077-CCL-XX-XX-DR-C-5009 Rev. P01: Proposed access swept path analysis: Maximum legal articulated vehicle routes with point of turn not fully considered.
- 215077-CCL-XX-XX-DR-C-0001 Rev. P02 - Demonstrates visibility splays from proposed access.

Highway authority response

“Further to our previous response dated 24/08/21, swept path vehicle tracking drawings were submitted to the Highway Authority by objectors to the proposal illustrating that a max legal size articulated HGV and 4 axle refuse vehicle could not negotiate the proposed road layout on Victoria Mill Road without over-running the footways and verges. This conflicted the previous tracking drawings provided by the applicant's transport consultant, although it was noted that different vehicles and routes were used. In response, the applicant's transport consultant has subsequently provided tracking drawings using the same vehicle types and routes as those provided by those objecting to the proposal. These drawings illustrate that the route can be negotiated by those vehicles within the constraints of the proposed layout. They have also provided a drawing illustrating how those same vehicle movements can be made to over-run the footways and verges by adjusting the turning movement. It should also be noted that the drawing provided by those objecting to the proposal appears to be based on PDF drawing extracts, rather than the topographical survey and AutoCAD software road layout design drawing. It is highly likely that this would impact upon the ability of the software user to provide an equally accurate vehicle tracking assessment of the proposal (to that provided by those with the benefit of the design). We also understand that refuse vehicles in East Suffolk are the 3 axle type, rather than the 4 axle type used on the drawing provided by those objecting to the proposal. Regardless of this, we are now satisfied that the proposed road layout could accommodate either type of refuse vehicle.

Subsequently, the Highway Authority remain satisfied that the proposed road layout can accommodate the vehicles necessary to construct and serve the proposed development.”

Questions relating to the proposed
highway re-alignment works

Design strategy of proposed scheme

Proposed scheme

The proposed scheme includes a phased development including the erection of up to 49 custom/self-build homes (including 16 affordable homes) public open space (including equipped play and multi-use games area), landscaping, and other associated infrastructure.



Quantity of dwellings

- All allocated sites within the neighbourhood plan define an 'up to' dwelling figure, with the exception of the subject site (Policy FRAM25), which states an 'approximate' quantity.
- Paragraph 141 (of Policy FRAM25 preamble) states – *“This site is considered suitable for approximately 30 dwellings. The restriction on the number of dwellings for the site reflects the limitations placed on it by the need for access off Victoria Mill Road.”*
- Policy FRAM25 states – *“Land off Victoria Mill Road (approximately 2.6 hectares as identified on the Policies Map) is allocated for housing for the second half of the Plan period (after 2025); proposals for approximately 30 dwellings will be supported subject to the following criteria...”*
- The proposed 49 dwellings equate to a density of development at 18.5 dwellings per hectare (dph), which is broadly in line with existing density on the northern side of Victoria Mill Road (15.7dph) – the adjacent Hopkins Homes development is 37.4 dph.
- In terms of site density concerns, the adjacent allocation along Station Terrace/Clarkes Drive (Policy FRAM26) supports 'up to 15 dwellings' on a site area of 0.34 hectares. This equates to a density of 44 dwellings per hectare (dph).
- Granting outline for an 'up to 49 dwellings' does not prohibit the Council requiring a lower number of homes if required to achieve good design appropriate for its location at reserved matters stage.

Timing of development

- As noted within the Examiner's Report (dated 9 November 2016), it was suggested appropriate to select this site for release later in the plan period due to the level of development within the town.
- A timeframe for delivery of development on the allocated site therefore set at **2025 onwards**.
- The submission of the subsequent reserved matters application and the general nature of the self-build and custom housebuilding approach would result in a phased development commencing near to 2025.
- Subject to approval of the reserved matters application(s), the site will likely take several years to be prepared and built out, prior to occupancy of residents.

On this basis, it is considered that the rate of delivery aligns with timeframe set out in the neighbourhood plan.

Housing mix

- Although the scheme fails to meet the policy targets for one-bedroom units, it is noted that the exceedance in provision of two-bedroom units, both in regard to the district and neighbourhood-wide targets, is a positive outcome of the proposal and helps to mitigate the deviation from the lack of the one-bedroom house type.
- An additional merit of these house types is the 'custom-build' approach.

Number of bedrooms	Percentage of district wide need (Policy SCLP5.8)	Percentage of neighbourhood need (Policy FRAM3)	Percentage proposed within application
1	12%	10-15%	8% (4 units)
2	29%	35-40%	49% (24 units)
3	25%	30-40%	22% (11 units)
4+	33%	10-15%	20% (10 units)

Self-build, custom-build and custom choice

The proposal comprises solely self-build and custom-build house types – these are defined as:

- **Self-build:** This offers the greatest degree of flexibility and customisation - individuals buy a serviced plot that is subject to a Design Code and a palette of materials. Buyers may choose to either project manage the build themselves or contract with a developer or house builder.
- **Custom-build:** Individuals buy a serviced plot and contract directly with a developer to build their house. But in this case the degree of flexibility is more limited — the house is configured from a range of preprepared layouts and specification options that have already been approved for planning: these can include ground floor extensions and rooms in the roof.
- **Custom-choice:** A developer builds the external walls and roof and exchange contracts on the watertight shell. Buyers then pick from a wide range of interior layout and specification choices to adapt the shell to their needs. They qualify for the Help to Buy scheme and can be purchased with a standard mortgage. The custom-choice route to market is particularly innovative as it enables purchasers, who might not otherwise be able to access custom/self-build, to participate.

Self-build, custom-build and custom choice

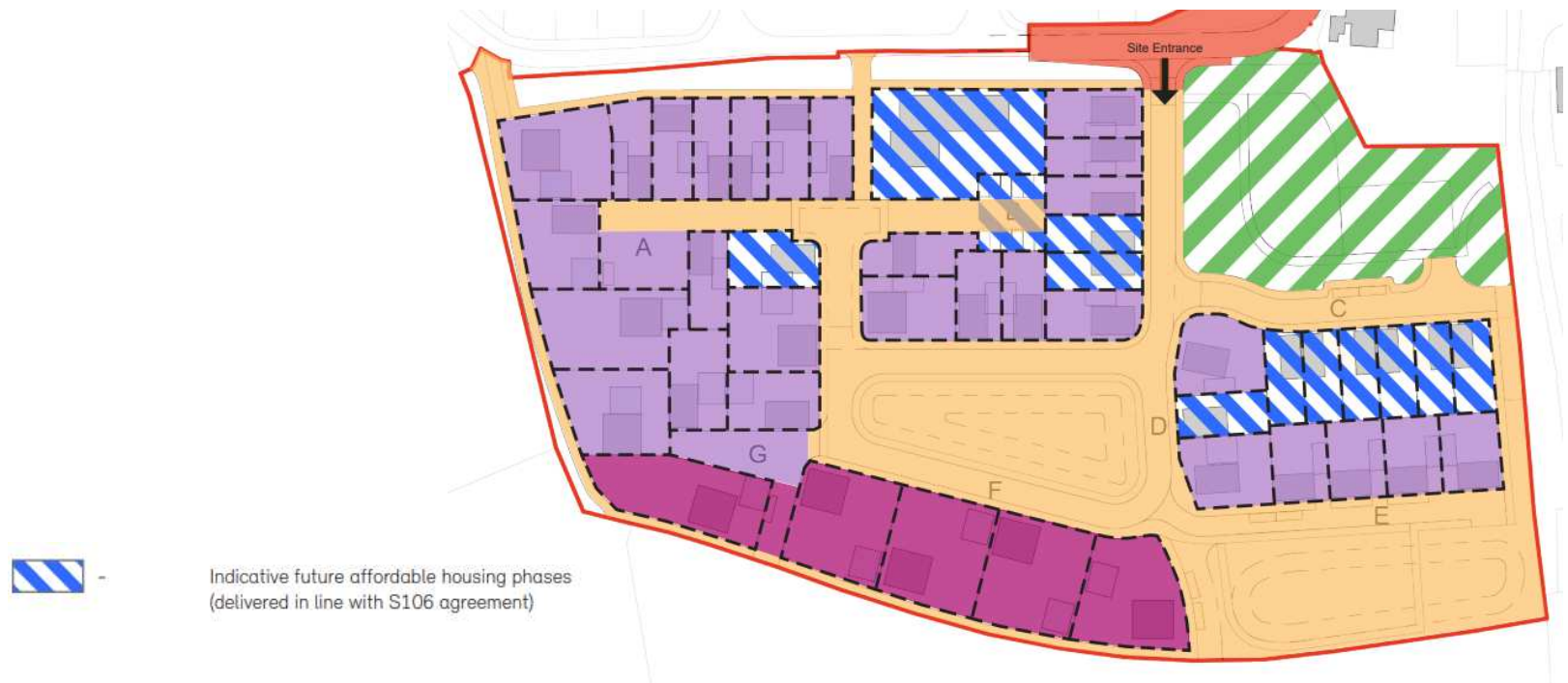
	Self-build	Custom-build	Custom-choice
Private sale	5 no. 4-bedroom houses	14 no. 2-bedroom houses 9 no. 3-bedroom houses 5 no. 4-bedroom houses	N/A
Shared equity/discount market	N/A	2 no. 3-bedroom houses 2 no. 3-bedroom houses	N/A
Shared ownership	N/A	N/A	2 no. 2-bedroom flats 2 no. 2-bedroom houses
Affordable rent	N/A	N/A	4 no. 1-bedroom flats 4 no. 2-bedroom houses
Total (dwellings)	5	32	12

*It is intended that **affordable housing** will be 'custom-choice', which is clearly defined and limited in scope to interiors only (e.g., internal paint colours, kitchen fittings within a selected range, door choices etc.). They will be delivered in line with the S106 agreement, which will state triggers for how and when the homes will be delivered.*

Affordable housing

The scheme is policy compliant in this respect with 32.7% (16 units) being affordable:

- Shared equity/discount market: 25% (4 of the 16 units)
- Shared ownership: 25% (4 of the 16 units)
- Affordable rent: 50% (8 of the 16 units)



Design standards

An illustrative masterplan is provided to demonstrate that up to 49 units can be accommodated on the site whilst meeting relevant planning policies.

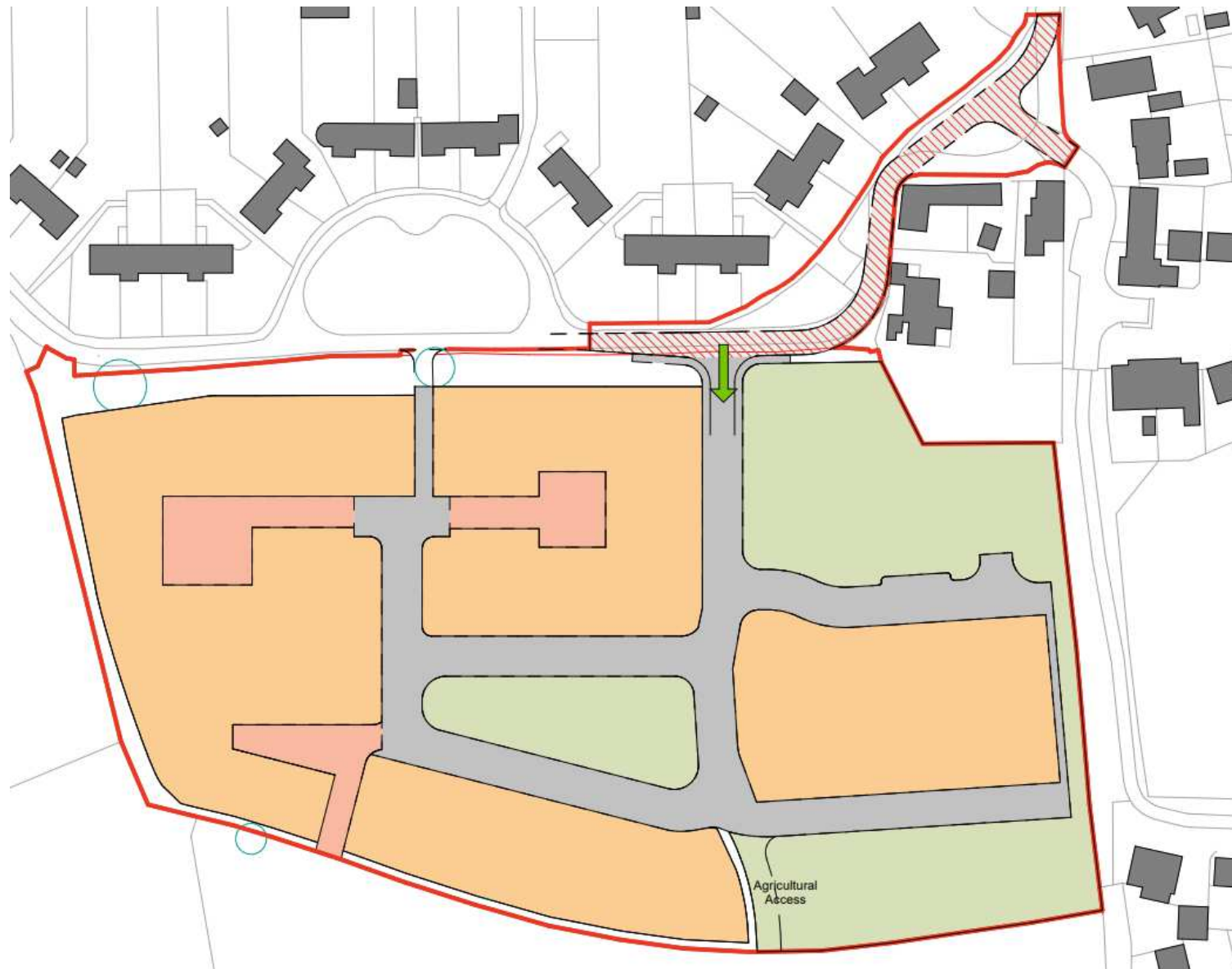
This will be required to inform the reserved matters applications along with the Design Code, Design & Access Statement, and the following parameter plans:







- Land use parameter plan
- Access and movement parameter plan
- Landscape & open space parameter plan
- Building height parameter plan
- Illustrative masterplan

Illustrative masterplan



Land use parameter plan



-  Planning boundary
-  Site entrance
-  Developable area
-  Access road
-  Indicative location of courtyard
-  Offsite Highways Work

Access and movement parameter plan
















-  Planning boundary
-  Site entrance
-  Primary Access Road
-  Secondary Access Road
-  Tertiary Access Road
-  Pedestrian & Cycle route connections
-  Connection to existing pedestrian & cycle network
-  Developable area
-  Indicative location of courtyard
-  Green open space
-  Offsite Highways Work
-  Existing mature trees (to be retained)
-  1 Additional access suitable for emergency vehicles if required
-  2 Area safeguarded for future pedestrian connection

Connectivity: cycling/walking



Landscape and open space parameter plan



-  Planning boundary
-  Site entrance
-  Developable area
-  Indicative location of courtyard
-  Green open space
-  Detention basin / SuDS
-  Pedestrian & Cycle route
-  Equipped play area
-  Root Protection Area
-  Existing ditch
-  Offsite Highways Work
-  Existing vegetation to be retained
-  Proposed hedge - 2m buffer

Landscaping including open space and play provision



Building heights parameter plan



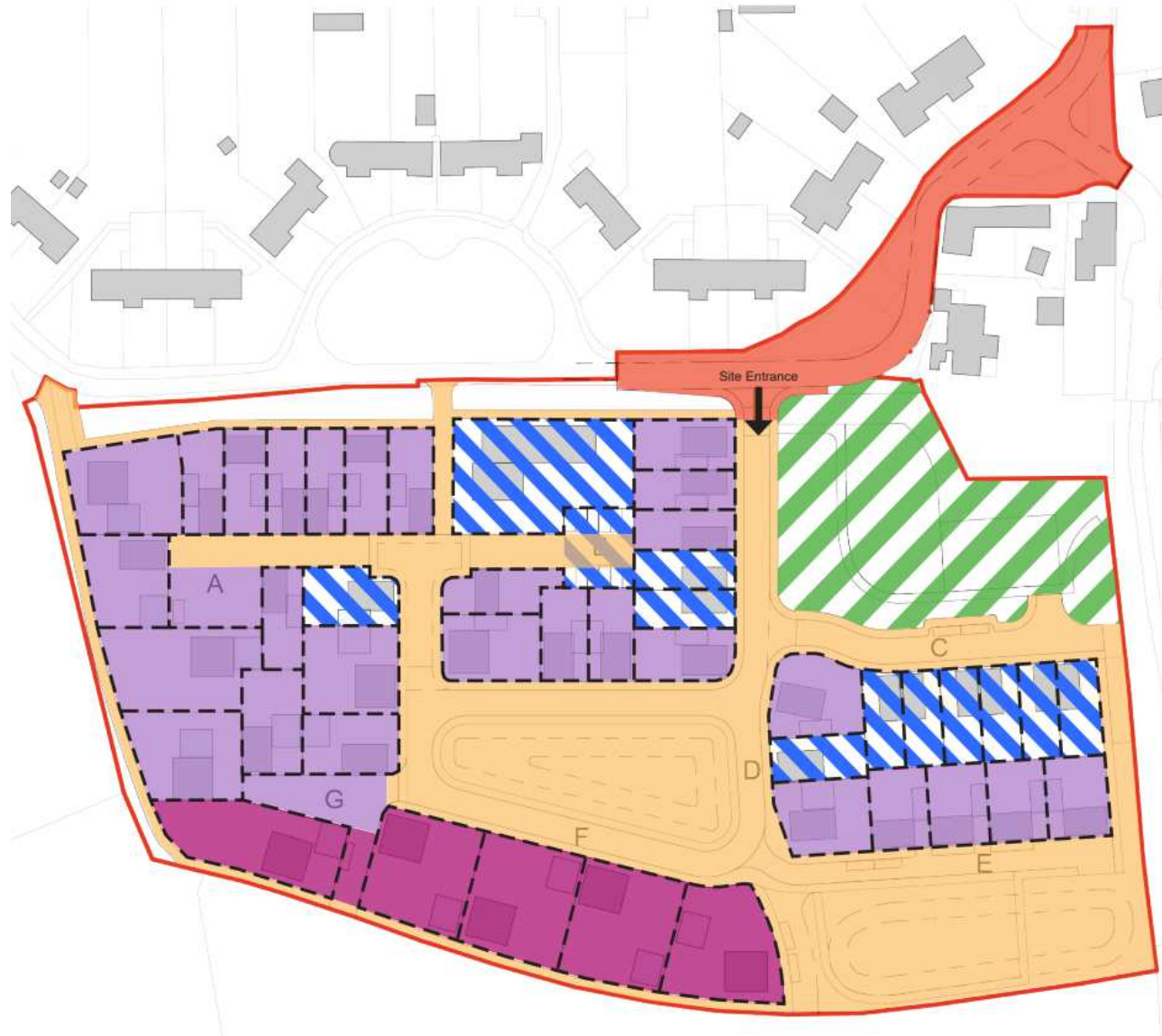
-  Planning boundary
-  Site entrance
-  Two - storey with traditional pitched roof - rooms in roof allowed
-  Two - storey with traditional pitched roof
-  Access road
-  Offsite Highways Work
-  Indicative location of courtyard
-  Green open space
-  Key frontage

Illustrative masterplan



-  Planning boundary
-  Site boundary
-  Developable area
-  Access road
-  Indicative location of courtyard
-  Green open space
-  Detention basin / sustainable urban drainage
-  Pedestrian & Cycle route
-  Equipped play area & Ball Court
-  Root Protection Area
-  Existing Ditch
-  Offsite Highways Work
-  Flats
-  2 - bedroom house
-  3 - bedroom house
-  4 - bedroom house
-  Garage
-  Proposed hedge - 2m buffer
-  Potential area for underground attenuation





Indicative phasing plan



Phase 1:

-  Phase 1A Access Improvements along Victoria Mill Road (highway land) and entrance to site (bell-mouth)
-  Phase 1B Site preparation, provision of access roads, footpaths and all services / drainage infrastructure for distribution around each individual plot (details to be confirmed at Reserved Matters stages)
-  Phase 1C Open Space and Equipped Play Provision (to be designed at RM stages)

Future phases:

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-  - Indicative future self-build phases. All plots to be built out individually following Reserved Matters applications served on a plot by plot basis. The individual construction will run concurrently and not one at a time i.e. phases overlap
-  - Indicative future custom build future phases. All plots to be built out individually following Reserved Matters approval. Phases will overlap, with some sequencing due to infrastructure provision
-  - Developable plot boundary

Planning considerations

The following considerations have been addressed within the reporting:

- Principle of development
- Timing of development/phasing
- Highways: access and road re-alignment
- Asset of community value
- Quantity of dwellings
- Housing mix
- Self-build and custom housebuilding
- Affordable housing
- Connectivity: cycling and walking
- Design and conservation
- Open space and play provision
- Community growing spaces
- Travel plan
- Landscaping
- Parking standards
- Flood risk and sustainable urban drainage
- Ecology
- Archaeology and heritage
- Sustainability
- Infrastructure provision

Conclusion

- The principle of residential development on the site is established by Framlingham Neighbourhood Plan
- Housing is likely to be occupied post 2025
- Provides publicly accessible green space and a Neighbourhood Equipped Area for Play (NEAP)
- No objection has been raised by the highways authority in relation to the road realignment
- Self-build / custom-build housebuilding approach is of great merit
- Affordable housing compliant
- Provides a mix of housing with a large proportion of two bed units
- Design is of a high quality and will be supported by a comprehensive design strategy
- No objection in relation to flooding, ecology or landscaping
- Detailed design matters to be addressed at reserved matters stage
- Mitigation methods to be secured by conditions, and S106 (as well as CIL funding)

While there are elements of the proposal that require further detail through reserved matters applications, the fundamental components relating to the outline application, including access and quantum of housing, do not make the detail or the principle of development objectionable.

Recommendation

Authority to approve subject to a 'Grampian condition' requiring highway improvements prior to development or other operations; planning conditions; and the completion of a S106 legal agreement, detailing highway improvement works, affordable housing provision, self/custom build requirement, county contributions, and a contribution to the Suffolk Coast RAMS.

Grampian condition

Development shall not commence (including site clearance operations) unless and until the off-site highway improvements to Victoria Mill Road indicatively shown on drawing number 215077-CCL-XX-XX-DR-C-0001 P05 have been completed in accordance with details previously approved in writing by the local planning authority.

Reason: To ensure that the works are designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

Conditions

Proposed conditions (as outlined in the report) relate to the following:

- Reserved matters time limit
- Reserved matters detail
- Grampian condition re. highway works
- Design code
- Phasing
- Highway detail – access; connectivity; secure cycling storage; EV charging points;
- HGV movements during construction
- Visibility splays
- Surface water drainage
- Sustainable drainage
- Archaeology
- Land contamination
- Air quality assessment
- Construction management plan
- Construction hours
- Ecological mitigation/protection
- Lighting strategy
- Construction environmental management plan
- Landscape and ecological management plan
- Signage and householder information packs
- Ecological enhancement strategy
- Affordable housing custom-choice approach
- Fire hydrants
- Sustainability and energy statement
- Landscape works and tree protection

End of presentation

Slides submitted by objector

8. “The interpretation of policies in the development plan are **a matter of law for the court and not one of planning judgement**: *Tesco Stores Limited v Dundee City Council* [2012] UKSC 13.”

27. “The officer has clearly **misinterpreted the development plan policies** [FRAM1 and FRAM25] **which are fundamental to the determination of the application**”.

Leigh Day

11. FRAM1 sets out two fundamental principles for all development proposals. First, they should be confined to the physical limits boundary unless specified circumstances apply. Second, they should be of a size appropriate to the town, which in general means they should be of no more than 30 dwellings."

Leigh Day

13. *“FRAM25 imposes requirements on any proposal for the development of the land off Victoria Mill Road. One such requirement imposes limits on the density of any proposal. The number of dwellings should be approximately 30, and any proposal of approximately 30 dwellings is “subject to” (that is, must also meet) a number of other criteria in order to be supported. One such criterion is that appropriate vehicle access from Victoria Mill Road is provided.”*

18. *“FRAM25 is merely repeating the general requirement in FRAM1”.*

Leigh Day

12. “The officer’s personal judgment as to whether or not the site allocation is at an appropriate density is irrelevant to the interpretation of the site allocation policy.”

Leigh Day

23. *The officer's supplementary report goes on to compare the density of FRAM25 with other allocations in the plan. She is welcome to make these comparisons, but must recognise that these do not affect the interpretation of FRAM25 and, again, do not provide any basis to conclude that the proposals accord with FRAM25, or for that matter FRAM1.*

Leigh Day

The 'Strategy for Framlingham' in the adopted Suffolk Coastal Local Plan, which states at paragraph 12.166:"

"In recent years, Framlingham has seen significant residential development allowed through appeals which has resulted in sites coming forward outside of the plan led approach. The individual sites have collectively had a detrimental impact on the provision of infrastructure in the town which has not been able to keep pace with current demands.

It is therefore not considered necessary for this Local Plan to allocate further development in the town. However, a key part of the relationship between the Local Plan and Neighbourhood Plans is to provide direction on housing requirements. Growth in Framlingham to 2031 is already planned for, so it is not anticipated that any future growth will come forward until post 2031."

Leigh Day