HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Mr Ramsey

In respect of:
Matter 3: Area Specific Strategies – Development Allocations
(Policy SCLP12.45: Land to the South East of Levington Lane, Bucklesham)

Date:
August 2019

Document Reference:
GA/DJ/03819/S0001
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of Mr Ramsey in respect of Matter 3 Area Specific Strategies – Development Allocations of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan. We have not registered to attend the examination hearing for this matter on behalf of Mr Ramsey and are content to rely on this written statement which provides a response to the following questions with respect to Policy SCLP12.45: Land to the South East of Levington Lane, Bucklesham:

- Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

- Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential conflicts?

1.2 The Statement is intended to assist the Inspector’s consideration of the soundness of the Plan and follows representations submitted on behalf of Mr Ramsey by Brown & Co to the Local Plan Final Draft consultation (Comment ID: 18).

1.3 Following the Final Draft consultation in early 2019, Manor Oak Homes has acquired an interest in the site and are currently preparing a planning application for submission in early autumn 2019. Manor Oak Homes are a Northamptonshire-based company that specialise in the promotion of development opportunities across predominantly the Midlands and East Anglia. They pride themselves on their thorough and sensitive approach to realising the potential of their sites. In particular Manor Oak Homes has a strong track record of working with Council’s, Parish Councils, local residents and statutory consultees to ensure that they can help meet the development needs of the community. As such, Manor Oak Homes will shortly be engaging in pre-application discussions with these parties.

1.4 This statement confirms the deliverability of the site for the allocated level of development in accordance with the policy criteria and draws on information prepared by Manor Oak Homes’ in support of their forthcoming application.

2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?
General Question
Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

2.1 No. The site comprises 1.4ha of agricultural land to the south of Bucklesham that directly adjoins the built up area and would form a natural extension to the village. The site is not constrained by any ecological or heritage designations, there are no public rights of way on the site and it is in Flood Zone 1 (i.e. low risk). It is therefore an entirely appropriate and justified residential allocation. This is further demonstrated by the fact there were no objections raised to the allocation of the site in the Local Plan Final Draft consultation.

2.2 In preparing their forthcoming planning application for the site, Manor Oak Homes has instructed a team of expert consultants to survey the site and identify any opportunities and constraints to development. This work confirms that there are no risks to the deliverability or viability of the allocation posed by site conditions, infrastructure or access requirements or any other constraints to development. A summary of the key findings of this work is provided below and a Constraints and Opportunities Plan prepared by Mosaic Architects is contained at Appendix 1:

Site Conditions:
2.3 The site is arable agricultural land with no history of other uses. It is very unlikely that there will be any constraints to development posed by contaminated land or other site conditions.

Infrastructure:
2.4 Mr Ramsey and Manor Oak Homes have undertaken appropriate site searches with respect to infrastructure provision and apparatus on the site. This has confirmed that there is no existing apparatus on the site that would constrain development and that the site can be appropriately served by utilities connections.

Access:
2.5 Martin Andrews Consulting Limited has assessed the access requirements for the site and advised following consultation with Suffolk County Council Highways that safe and suitable access can be provided to the site. As shown on the Engineering Constraints plan at Appendix 2 the site can be accessed off Levington Lane via a simple priority junction with 43m visibility splays in accordance with Suffolk County Council guidance. Levington Lane will be widened to a 5m width from the site’s access immediately to the north of The Blundells which matches the existing width of Levington Lane to the north of the site and a new 2m wide footway will be provided between the site access and The Blundells adjacent to Levington Lane.
Flood Risk and Drainage:

2.6 Martin Andrews Consulting has advised that the allocation site is at a low risk of flooding from all sources of flooding and that surface water from the site can be drained via infiltration techniques. For adopted roads the drainage strategy will comprise an infiltration basin and for private drives and dwellings a combination of on plot soakaways and permeable paving will be used. The proposed infiltration basin is shown on the Engineering Constraints plan at Appendix 2.

Ecology and Trees:

2.7 Wharton Natural-Infrastructure Consultancy (WNIC) have conducted ecological and tree surveys of the site. From an arboricultural perspective, constraints to development are minimal. The boundary hedge is of low arboricultural value and limited future potential due to its species composition, however does provide a screen from the Levington Road to the west. The boundary hedgerow is not considered to be a constraint to development and the only removals required to achieve access are considered to be of low or very low value. The only constraint in arboricultural terms is Category B oak specimen along the western boundary which would be unaffected by the access into the site and retained as a feature of the development. It is recommended that a new native hedgerow is planted on the new site boundary line to create a sustainable boundary screen of greater arboricultural value than currently present on site.

2.8 The only ecological constraints to development can easily be managed through design, mitigation and precautionary working and overall the proposed development provides an opportunity to ecologically enhance an arable field of negligible ecological importance and very limited botanical diversity. The hedgerow along the western boundary of the site isn’t particularly diverse terms of species but has potential as a corridor for commuting bats. It is therefore recommended that any hedgerow removal required for access is compensated for via replanting of a new hedgerow with mature species in a similar area to the hedgerow to be lost.

Landscape:

2.9 Aspect Landscape Planning has conducted a landscape assessment of the site which identifies that views of the proposal would be predominantly confined to the localised context. The existing vegetation structure associated with the site and the surrounding landscape setting filter views towards the site, ensuring that views into the site remain glimpsed from publicly accessible areas. Where views are available, these are seen within the settlement context of Bucklesham.

2.10 It is considered that the proposed landscape treatment in the form of a landscaped buffer to the south and east of the site, when combined with the existing vegetation that is to be retained, will ensure that the proposals benefit from a high degree of physical and visual integration, with the vegetation
structure providing a high level of visual containment. The existing urban grain of the village and wider landscape character have informed size and extent of the proposed allocation and it is considered that the proposal can be accommodated without detriment to the localised and wider visual amenity and that localised landscape character will be preserved, with proposed landscape features contributing positively to the identified wider landscape character.

**General Question**

**Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential conflicts?**

2.11 We are pleased to confirm that Mr Ramsey considers **Policy SCLP12.5** to be fully justified and appropriate. To demonstrate the deliverability of the site, Mosaic Architects has prepared the indicative layout contained at **Appendix 3** which meets all the policy criteria for the allocation and the requirements of other key development management policies, while also respecting the key constraints and opportunities to development. This is demonstrated in the table below.

<table>
<thead>
<tr>
<th>Policy SCLP12.4S Criteria</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development of approximately 30 dwellings in accordance with the following criteria.</td>
<td>The indicative layout achieved 30 dwellings in a layout that respects the character of the site and its surroundings and meets all relevant policy criteria as set out below.</td>
</tr>
<tr>
<td>a) Design and layout to reflect the linear nature of Levington Lane, with semi-detached or terraced properties provided on the frontage with Levington Lane;</td>
<td>The indicative layout shows a linear line of properties fronting Levington Lane to reflect the character of the road. These properties are shown as a mix of terraces, semi-detached and detached dwellings to reflect local character.</td>
</tr>
<tr>
<td>b) Affordable housing to be provided on site;</td>
<td>The indicative layout does not at this stage indicate plot numbers for the affordable units and this will be subject to discussion with the Council's housing officer to confirm the correct mix to meet local needs. We are, however, pleased to confirm that the proposal would include 1 in 3 units as affordable housing in accordance with Policy SCLP5.10.</td>
</tr>
<tr>
<td>c) Retention of trees and hedgerows along the frontage with Levington Lane where possible;</td>
<td>The indicative layout shows that only a short section of hedgerow is required to be removed to achieve access and as set out above, the only removals required are considered to be of low or</td>
</tr>
</tbody>
</table>
very low value. The majority of the removed hedgerow will be replaced in a location set back from the road to allow road widening, footpath and visibility splays. The Category B oak tree along the western boundary is shown as retained and a new native hedgerow is shown on the site boundary to the south and east that would provide enhanced arboricultural and ecological interest.

d) Landscaping and boundary treatments appropriate to the rural character of the area surrounding the site to the east and south; A landscape buffer is provided to the south and east of the site appropriate to the rural character of the surrounding area.

e) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity or that capacity can be made available; and We are pleased to confirm that a pre-application planning enquiry will be submitted to Anglian Water as part of the pre-application consultation for the forthcoming application. This will identify current capacity and any necessary mitigation to provide additional capacity if necessary.

f) Provision of a footpath to connect the site with the footpaths to the north of the site, and widening of Levington Lane along western boundary of site where necessary. A footpath is shown connecting the site with the footpaths to the north of the site and Levington Lane is shown as being widened to 5m to match the existing carriageway to the north.

Other Policy Requirements

Policy SCLP5.8: Housing Mix
Proposals for 5 or more units should provide for a mix of sizes and types based upon table 5.1 and include at least 40% 1 and 2 bedroom properties.

<table>
<thead>
<tr>
<th>Table 5.1 Mix</th>
<th>Layout Mix</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bed</td>
<td>13.33% (4 dw)</td>
</tr>
<tr>
<td>2 bed</td>
<td>26.67% (8 dw)</td>
</tr>
<tr>
<td>3 bed</td>
<td>26.67% (8 dw)</td>
</tr>
<tr>
<td>4 bed</td>
<td>33.33% (10 dw)</td>
</tr>
<tr>
<td>Total</td>
<td>100% (30 dw)</td>
</tr>
</tbody>
</table>

The housing mix shown on the indicative layout is in accordance with the required mix as follows:

Policy SCLP5.10: Affordable Housing
Requires 1 in 3 units to be affordable and a tenure mix of 50% affordable rent / social rent, 25% shared ownership and 25% discounted home ownership.

The indicative layout does not at this stage indicate plot numbers for the affordable units or a proposed tenure mix. We are, however, pleased to confirm that the proposal would include 1 in 3 units as affordable housing in accordance with the tenure split at Policy SCLP5.10.
Policy SCLP7.2: Parking Standards
Refers to standards set by the ‘Suffolk Guidance for Parking’ (2015) and seeks to ensure that these standards are a minimum.

We are pleased to confirm that the indicative layout has been designed in accordance with the ‘Suffolk Guidance for Parking’ (2015) and would provide:

- 1 bedroom = 1 space
- 2 bedroom = 2 spaces
- 3 bedroom = 2 spaces
- 4+ bedroom = 3 spaces

2.12 It should be clear from the above that the allocation of Land to the South East of Levington Lane, Bucklesham by Policy SCLP12.5 is entirely justified and appropriate. There are no risks to the deliverability or viability of the allocation posed by site conditions, infrastructure or access requirements or any other constraints to development. The site is deliverable in accordance with all the relevant policy criteria, while respecting the key constraints and opportunities to development, and Manor Oak Homes has acquired an interest in the site which further confirms its deliverability and viability as a proposed allocation.
Land South East of Levington Lane, Bucklesham - Constraints and Opportunities

- Allocation boundary
- Potential access junction
- Opportunity for widening of existing road
- Potential footpath connection by partially removing category C/U trees
- Exiting properties
- Existing groups of trees
- Existing individual trees
- RPA Category B
- RPA Category C
- RPA Category U
- Retained and enhanced roadside hedgerow
- Existing slope
- 0.5m Contours
- Potential SUDs pond location
- Opportunity for view to countryside
- Potential planted buffer
- Opportunity for fronting landscape
- Potential development area
- Lower density dwellings
Appendix 2

Engineering Constraints Plan
Estimated infiltration basin required to drain adoptable roads only. Subject to detailed design and infiltration test results.

All dwellings and private drives to drain via permeable paving or plot soakaways.

Notes:
1. Based on Brightsurv 'Topographical Survey', drawing number BR170 T01 dated July 2019
2. Based on Ordnance Survey mapping ©Crown Copyright and database rights 2019 OS 100019980

Key
- Junction visibility splay - 2.4m x 43m
Appendix 3
Indicative Layout
Land South East of Levington Lane, Bucklesham

Date: 31.07.19 / Job ref: 1137

- Access junction
- Buffer planting -new edge
- Retained and enhanced vegetation
- Infiltration basin
- Views to countryside
- Reinstated hedgerow
- Allocation boundary

Scale: 1:1,000 at A3