HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Hopkins & Moore (Developments) Ltd

In respect of:
Matter 3 Development Allocations (Policy SCLP12.49 Land North of The Street, Darsham)

Date:
July 2019

Document Reference:
GA/EW/05017/S0018
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins & Moore (Developments) Ltd in respect of Matter 3 Development Allocations (Policy SCLP12.49 Land North of The Street, Darsham) of the Inspector's Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector's consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 17th September 2019.

2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

   Question 3.62
   Is access via the Millfields development as set out in criterion a) deliverable and justified?

2.1 Hopkins & Moore submitted a planning application on the site for 26 dwellings in April 2019 (reference DC/19/1462/FUL). As part of the application, it has been demonstrated that achieving access through the existing adjacent Millfields development would not be possible in light of technical and potential land ownership issues and that a safe access can be provided from The Street retaining as many trees as possible. Technically and legally, access to the site via Millfields is not deliverable. As drafted the policy criterion to refer to this is not therefore justified or sound.

2.2 Please refer to the Draft Statement of Common Ground prepared between East Suffolk Council, Hopkins & Moore (Developments) Ltd at Appendix 1. This confirms the agreement that it would be more appropriate for the policy to refer to the need to provide a safe and suitable access, rather than to specify from which road this should be from. It is agreed that the supporting text at paragraph 12.531 and criteria (a) are amended accordingly in this respect. The Statement of Common Ground is expected to be signed by the Council before the Hearing sessions.

   Question 3.63
   Paragraph 12.529 is inconsistent with Policy SCLP12.49 in respect of the number of dwellings anticipated.

2.3 It is noted that Paragraph 12.529 states that site is allocated for development of approximately 20 dwellings which is inconsistent with Policy SCLP12.49 which identifies the site for the development of...
approximately 25 dwellings. It has been agreed in the Statement of Common Ground that paragraph 12.529 should be amended accordingly to refer to approximately 25 dwellings.

**General Question**

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

2.4 Subject to the changes detailed in the Statement of Common Ground, the policy criteria are considered to be justified and appropriate.

**General Question**

*Are there any significant factors that indicate that the site 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?*

2.5 There are no significant constraints to development that indicate the site should not be allocated.

2.6 Hopkins & Moore (Developments) Ltd have demonstrated their commitment to bringing the site forward at the earliest opportunity through the submission of a full planning application on the site to enable the delivery of a sustainable development and the provision of significant economic, social or environmental gains for the area.

2.7 In terms of infrastructure requirements, an issue has however been raised in the consideration of the current planning application whereby emerging Policy SCLP9.6, which specifies that developments are required to utilise sustainable drainage systems and Policy SCLP7.2 which insists that proposals involving vehicle parking should include the incorporation of SUDS, have been applied inflexibly. These requirements result in the possibility that there will be significant land take on relatively small developments which has implications for the number of dwellings which can be delivered, contrary to the requirements set by the NPPF for planning policies and decisions to make effective use of land.

2.8 Hopkins Homes do not object to an approach that favours SUDS provision and they will naturally incorporate SUDS measures and minimise run off rates to green field rates for their developments. There is a need for recognition however, that SUDS requirements need to be balanced with other required land uses to ensure efficient use is made of land and the number of dwelling proposed to be allocated can be delivered.

2.9 We therefore seek clarification from the Inspector and Council that there is flexibility in the application of these policies as confirmed in the wording which states that developments are required to utilise
sustainable drainage systems, ‘unless demonstrated to be inappropriate.’
Appendix 1

Draft Statement of Common Ground
DRAFT Statement of Common Ground between East Suffolk Council and Hopkins & Moore (Developments) Ltd

Matters relating to Policy SCLP12.49 Land north of The Street, Darsham

Local Plan covering the former Suffolk Coastal area

July 2019
Purpose of Statement

1 This Statement of Common Ground has been produced to advise the Inspector on the agreed position in relation to the delivery of Policy SCLP12.49 Land North of The Street, Darsham. This Statement has been prepared jointly between East Suffolk Council and Hopkins & Moore (Developments) Ltd.

2 Representations relevant to this Statement of Common Ground are set out below:
   - Representations to Suffolk Coastal Local Plan Final Draft by Armstrong Rigg Planning on behalf of Hopkins & Moore (Developments) Ltd (Rep ID 1255)

The Site

3 The site is 1.11ha in size and is located to the west of a recently constructed Hopkins & Moore development known as Millfields forming a gap within the existing built up area of Darsham.

4 The site is allocated for approximately 25 dwellings with development expected to comply with a number of criteria including that (a) access is provided through the existing Millfields development or via The Street.

Agreed Position

5 The parties agree that the site is deliverable for approximately 25 dwellings but that it would be more appropriate for the policy to refer to the need to provide a safe and suitable access, rather than to specify from which road this should be from. If this is via The Street, it is agreed that trees should be retained except where necessary to provide a satisfactory access.

6 The parties consider, with the following main modifications below, the plan is sound in respect of matters relating to highways access.

7 Deletions to text is shown crossed out, additional text is shown underlined.

Policy SCLP12.49: Land north of The Street, Darsham

Changes to supporting text
12.531 A number of trees along the southern boundary of the site have Tree Preservation Orders, and should be protected wherever possible. A safe and suitable vehicular access
should be provided. Access to the site could be via the adjoining Millfields development or via The Street provided that trees and hedgerows are retained where possible.

12.529 The site is allocated for development of approximately 20–25 dwellings.

Changes to policy
1.11ha of land north of The Street, Darsham, as shown on the Policies Map, is identified for the development of approximately 25 dwellings.

Development will be expected to comply with the following criteria:

a) Provision of a safe and suitable vehicular access Access to be provided through the existing Millfields development or via The Street;

b) Existing hedgerows and trees on the frontage of The Street to be retained subject to provision of satisfactory access;

c) Retention of trees on the southern boundary of the site;

d) Enhancements to the existing footway along part of southern boundary linking into the site;

e) A site-specific Flood Risk Assessment;

f) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity and provision for treatment or that this can be provided;

g) Affordable housing to be provided on-site; and

h) An archaeological assessment will be required.
Signatures

Signature:

Print name: Geoff Armstrong
Position: Director, Armstrong Rigg Planning
Authority: East Suffolk Council
Organisation: On behalf of Hopkins & Moore (Developments) Ltd
HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Hopkins & Moore (Developments) Ltd

In respect of:
Matter 3 Development Allocations (Policy SCLP12.52 Land West of Chapel Road, Grundisburgh)

Date: July 2019

Document Reference: GA/EW/05017/S0009
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins & Moore (Developments) Ltd in respect of Matter 3 Development Allocations (Policy SCLP12.52 Land West of Chapel Road, Grundisburgh) of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector’s consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 17th September 2019.

2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

Question 3.69

Would the proposed access via Chapel Road and the wider village road network achieve safe and suitable access for all users? Is the Policy sufficiently clear as to how a decision maker should react to a development proposal in this regard? In terms of vehicular and pedestrian access and the requirement for any off site works, is the site deliverable or developable as per the Framework definitions?

2.1 As drafted, the policy is not considered to be deliverable or developable having regard to the requirement to provide access via Chapel Road. It has been determined by investigations undertaken by highways consultants Ingent detailed in the Technical Note at Appendix 1, that a safe and suitable access off Chapel Road cannot be achieved due to its narrow width, lack of footpaths and the inability for it to be suitably widened.

2.2 The alternative therefore of providing an access from Park Road to the south has been considered where there exists the opportunity to widen the road in areas to form suitable passing sections subject to clearance within the highway boundary. As demonstrated on the attached access drawing 1812-296-001 Rev A, a suitable and safe access point achieving appropriate visibility splay can be provided via Park Road.

2.3 Discussions have taken place with the District Council which have confirmed their position that in principle a modification to extend the site area to that which was originally submitted to achieve the access off Park Road to the south would be supported (see plan below). In addition, Suffolk County Council Highways have confirmed that this modification would be acceptable in principle. It is expected
that a Statement of Common Ground between the parties in relation to this matter can be progressed before or during the Hearing sessions.

**Proposed modification to the proposals map for SCLP12.52**

**Question 3.70**  
*Is the requirement for the provision of on-site public open space justified?*

2.4 The policy requirement for the provision of on-site public open space is not considered to be fully justified. The site is directly adjacent to a large (2.5ha) recreation ground to the west which contains football pitches, tennis courts and a children’s play area. These facilities would be directly accessible to occupiers of the development on the site and indeed the site is expected to be connected to it as confirmed in paragraph 12.577 of the supporting text which identifies that opportunities should be explored to create safe access to Ipswich Road via the recreation ground.

**Question 3.71**  
*Is the provision of dwellings designed to meet the needs of the older population justified?*

2.5 It is acknowledged that changes to the National Planning Practice Guidance (PPG) on 26th June 2019 encourage the building of more homes for such users and confirm that Plans can set out different policy requirements for different types of development. However, these policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies and local and national standards, including the cost implications of Community Infrastructure Levy and section 106 (Paragraph: 015 Reference ID: 63-015-20190626).
2.6 As set out in our Hearing Statement on behalf of Hopkins Homes to Matter 4 Policies (Policy SCLP5.8 Housing Mix), the Council’s approach to meeting the housing needs of the elderly is deeply flawed. The Council has forecast the need for housing for older people, but not considered in any depth how this need should best be met. There has been little regard paid to the type of dwellings needed and almost no provision made for specialist accommodation (i.e. sheltered housing, enhanced sheltered housing and extra care housing). This flawed approach is continued in several site allocations, including this one, that require a mix of housing that includes an unspecified proportion of housing suitable for the elderly. No evidence is presented that due consideration has been given to any actual assessed need or demand for housing to meet the needs of the older population in Grundisburgh and it is clear from the Council’s definition of housing suitable for the elderly contained at Paragraph 5.44, that the only provision that could reasonably be expected as part of the mix on this site would be bungalows and smaller properties with larger than normal living spaces. Not only would this not meet the clear need for specialist elderly accommodation, but it would duplicate the excessive requirement at Policy SCLP5.8 for all sites to provide 50% highly accessible and adaptable homes.

2.7 Our Hearing Statement for Policy SCLP5.8 Housing Mix concludes that the Council’s approach to meeting the housing needs of older people would be ineffective and it is clear that the Policy requirement (criteria a) for the housing mix to include suitable provision to meet the needs of the elderly population would also be ineffective in meeting actual needs. It is also considered that the overly restrictive criteria may serve to discourage planning applications coming forward where this policy requirement may not be appropriate for the local context and would therefore adversely affect the delivery of housing and the enabling of sustainable development.

2.8 Accordingly, it is considered that this criterion is not based upon objectively assessed development requirements or proportionate evidence and is therefore not positively prepared or justified and should be deleted.

**General Question**

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

2.9 The allocation area currently arbitrarily dissects the field where there is no discernible boundary. A larger site (reference 351), which extended to the south to Park Road, was assessed positively in the Strategic Housing and Economic Land Availability Assessment (Examination Document Reference D10). Having regard to the current site area it is not considered possible to provide the quantum of development envisaged, along with all other policy requirements, in a density reflective of the prevailing character of the surrounding built form and sensitive landscape setting.
2.10 In this regard, the accompanying Statement of Common Ground confirms the agreement that the site boundary should be extended to Park Road to the south in order to deliver an appropriate access. This will also enable the delivery of an appropriate scheme for 70 dwellings whilst meeting other policy requirements and to ‘round off’ the settlement in an appropriate manner.

2.11 Subject to the changes detailed above, the policy criteria are considered to be justified and appropriate.

**General Question**

Are there any significant factors that indicate that the site 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?

2.12 There are no significant constraints to development that indicate the site should not be allocated.

2.13 Hopkins & Moore (Developments) Ltd are committed to bringing the site forward at the earliest opportunity through the submission of a full planning application on the site to enable the delivery of a sustainable development and the provision of significant economic, social or environmental gains for the area.

2.14 In terms of infrastructure requirements, an issue has however been raised in the consideration of planning applications elsewhere in the District whereby emerging Policy SCLP9.6, which specifies that developments are required to utilise sustainable drainage systems and Policy SCLP7.2 which insists that proposals involving vehicle parking should include the incorporation of SUDS, have been applied inflexibly. These requirements result in the possibility that there will be significant land take on which has implications for the number of dwellings which can be delivered, contrary to the requirements set by NPPF section 11 for planning policies and decisions to make effective use of land.

2.15 Hopkins Homes do not object to an approach that favours SUDS provision and they will naturally incorporate SUDS measures and minimise run off rates to green field rates for their developments. There is a need for recognition however, that SUDS requirements need to be balanced with other required land uses to ensure efficient use is made of land and the number of dwelling proposed to be allocated can be delivered.

2.16 We therefore seek clarification from the Inspector and Council that there is flexibility in the application of these policies as confirmed in the wording which states that developments are required to utilise sustainable drainage systems, ‘unless demonstrated to be inappropriate.’
2.17 As set out in representations to the Final Draft Local Plan, Hopkins & Moore (Developments) Ltd maintain that the site can be allocated alongside Policy SCLP12.48 Land to the West of Ipswich Road, Grundisburgh which was deleted between the first and Final Draft Local Plan, in order to provide maximum flexibility for deliverability over the Plan period.
Appendix 1

Technical Note by Ingent
TECHNICAL NOTE

PROJECT: Land East of Chapel Road, Grundisburgh

Subject: Access to potential development of 70 dwellings east of Chapel Rd.

To: 
Cc: 

Our Ref: 1812-296
Date: 11 July 2019
Author: Richard Wigzell (Ingent)

Access from Chapel Road

The site is located approximately 700m from the centre of Grundisburgh along Chapel Road and Meeting Lane which run together continuously. Grundisburgh Primary School is a distance of 380m along Meeting Lane, north of the site.

Outside the site itself Chapel Road is narrow at typically 3.5m width. Continuing north to the centre of Grundisburgh, Chapel Road and Meeting Lane remain narrow the entire way and are often without attached footway. One narrow section of Meeting Lane allows single vehicle passage only with the provision of a passing place. Measurements of width have been taken of Meeting lane and found to be generally between 3.2m and 4.4m.

The expected scale of the development is for 70 dwellings which in accordance with Suffolk Design Guide would require a 5.5m road width and 1.8m attached footways. Between the site and the centre of Grundisburgh, Chapel Road/Meeting Lane currently serve around 80 – 90 dwellings would result in a future total demand of around 150 dwellings – accessed from a road only capable of maximum 50 dwellings in accordance with the guide.

Although widening of Chapel Road along the frontage of the site would be possible in areas, this would be limited by existing trees. There is also not sufficient available highway land between the site and the village centre to achieve the required road geometry. As well as inadequate road width it would not be practical to create a footway connection along Meeting Lane due to existing constraints.

The draft allocation does make reference to exploring the opportunity for pedestrian access across the adjacent recreation ground to Ipswich Road to the west, where existing footways do link into the village and this is considered the most suitable route.
Access from Park Road

As access from Chapel Road is considered unlikely to be acceptable, access from Park Road has also been considered.

Although there is considerable vertical variation across the southern boundary with Park Road falling steeply from west to east, it is considered that a suitable location in terms of visibility would be possible.

Although Park Road is below standard in width at around 4.0m – 5.0m, there is understood to be scope to widen the road in areas and form suitable passing sections.

Conclusion

We would have concerns with delivering a suitable access to this site due to the nature of Chapel Road/Meeting Lane along the desire line between the site and the village centre.

We would consider the existing route to be unsatisfactory for the number of dwellings it presently serves in terms of vehicular and pedestrian access, and would expect considerable objection to the proposal of nearly doubling the load on it.

Park Road and Lower Road present more suitable routes of access to the site. Limited improvements to Park Road would appear achievable subject to clearance within the highway boundary.
HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Hopkins & Moore (Development) Ltd

In respect of:
Matter 3 Development Allocations (Policy SCLP12.54 Land North of The Street, Kettleburgh)

Date:
July 2019

Document Reference:
GA/EW/05017/S0010
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins & Moore (Development) Ltd in respect of Matter 3 Development Allocations (Policy SCLP12.54 Land North of The Street, Kettleburgh) of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector’s consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 17th September 2019.

2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

Question 3.72
Is the provision of approximately 16 dwellings on the site justified given the character and appearance of the area?

2.1 The site is located to the north of The Street, Kettleburgh which is characterised by low density development in a linear frontage form along the road as well as development to the rear, notably the cul-de-sac at Lings Field to the west and dwellings behind the Brambleside and Langhurst to the east.

2.2 The First Draft Local Plan proposed 16 dwellings to be allocated on site of 0.75ha which extended to the rear boundary consistent with that of surrounding properties and the defined settlement boundary. The extent of the site allocation from the First Draft Local Plan is shown in Plan 1 below:

Plan 1 – First Draft Local Plan
2.3 The site area was then reduced at the Final Draft stage to 0.43ha resulting in an arbitrary dissection of the field and an inconsistent settlement boundary line. Despite the reduction in site area, the proposed quantum of development remained at 16 dwellings. The extent of the site allocation from the Final Draft Local Plan is shown in **Plan 2** below:

![Final Draft Local Plan](image)

2.4 Hopkins & Moore consider that 16 dwellings on a site area of 0.43ha would result in a high density of 37dph and would not be able to be reasonably accommodated on the site in a manner reflective of the character of the surrounding area and in making this point in their representations to the Final Draft Local Plan, sought the allocation of the site for a reduced quantum of approximately 9 dwellings.

2.5 A pre-application submission was then made in June 2019 for a scheme of 9 units on the smaller site. This comprised a layout with a mix of terrace, semi-detached and larger detached units in a generally linear form. Officers considered in their response that the proposal would be incongruous in scale and layout would not make most efficient use of the site and suggested that additional dwellings of a smaller scale could be considered consistent with the emerging policy. The layout and pre-application response is attached at **Appendix 1**.

2.6 In light of the above, Hopkins & Moore consider that in the interests of boosting and maintaining the supply of housing, the site should remain allocated for 16 dwellings, however to enable a more appropriate lower density development and layout to be delivered in the form of linear development along The Street and some built form to the rear consistent with the surrounding area, the site area should revert to that shown at the First Draft Local Plan stage. Supporting text paragraph 12.602 states that linear development along the frontage, with further development to the rear, would reflect the existing streetscene.
2.7 In summary the provision of approximately 16 dwellings on the site is considered justified subject to the site area being increased to the extent proposed at the First Draft stage. Criteria (a) should also be amended to refer to development to the rear also being suitable consistent with supporting text paragraph 12.602.

**Question 3.73**
If the capacity of the site is less than that stated, should the criterion in regard to affordable housing be qualified given the requirements of Policy SCLP5.10 that contributions would be sought for schemes of 10 units or more?

2.8 As confirmed above, notwithstanding Hopkins & Moore’s previous position, it is considered that the allocation of the site should remain at 16, albeit on a larger site area. Affordable housing provision would therefore be triggered to the benefit of meeting local housing needs.

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

2.9 With regard to the requirement (criteria c) for a S106 contribution to a new early years setting, the NPPF states at paragraph 35 that for plans to be considered sound, they must be justified which it defines as comprising “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” In this regard, the Plan is not supported by any evidence to demonstrate that there is a current deficit in pre-school places in Kettleburgh. There is furthermore no evidence to justify how the allocation would generate sufficient demand to require a S106 contribution towards a new pre-school rather than a contribution through CIL towards the expansion of an existing setting (as is the requirement for the majority of site allocations). Indeed, there is no evidence to suggest that other alternative options have been investigated either through physical expansion or longer opening hours of existing provisions or the likelihood that new private sector nurseries would open to meet any increased demand.

2.10 It is interesting that the Plan’s evidence base does not appear to refer to Suffolk County Council’s Childcare Sufficiency Assessment (December 2018), despite this containing what we understand to be the most up to date position with respect to the need for early years places in the County. An extract from this report is attached at Appendix 2 which details the early years education places available in the Framlingham/Leiston Cluster area which includes Kettleburgh (as part of Framlingham ward). The report identifies that there is a current **surplus of 66 places** in the cluster which rises to **a surplus of 102** when migration of children in and out of the cluster is taken into account. The report also notes that there have been several new settings opened in the last year, including a new provider in
Framlingham which would provide 28 early education places all year round from January 2019 and another provider that is planning to move to Framlingham from a neighbouring ward. This clearly contradicts paragraph 12.607 of the Final Draft Plan which states that early years provision is forecast to be overcapacity in Framlingham ward.

2.11 Seeking provision of a new early years setting is only justified when there is clear evidence that the private sector cannot expand to meet needs or requires support to be able to expand. The requirement has not been demonstrated by proportionate evidence which fails the tests of soundness.

2.12 In regard to criterion (h) which requires the retention and enhancement of Kettleburgh village sign, it is considered that as drafted the criterion is overly restrictive and may impact on the future layout of a scheme and to provide flexibility, the criterion should be amended to state that the sign can be retained upon or near the site.

**General Question**

*Are there any significant factors that indicate that the site 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?*

2.13 There are no significant constraints to development that indicate the site should not be allocated. Subject to the changes detailed above, the site comprises a deliverable option for housing development. Hopkins & Moore (Developments) Ltd have an option on the site and are committed to bringing it forward at the earliest opportunity to enable the delivery of a sustainable development and the provision of significant economic, social or environmental gains for the area. The site is a suitable and deliverable residential site which is well related to the settlement and has no insurmountable constraints to development which can assist in meeting the District's housing needs over the Plan period in a sustainable manner.
Appendix 1
Layout and Pre-app response
Pre-application planning advice

Application ref: DC/PREAPP/19/1452
Location:
Land North Of
The Street
Kettleburgh
Suffolk
Proposal:
Pre Application Advice - Proposed Residential Development of 9 Dwellings, together with associated access, car-parking and garaging

Officer advice

Pre-application advice is requested regarding the principle of the erection of 9 no. dwellings at land north of The Street, Kettleburgh.

Site History, Constraints & Access
The site is within a Special Landscape Area. There is a hedgerow along the site frontage, with more sparse vegetation along the eastern and western boundaries. The north and south the site is abutted by agricultural fields. There is an existing informal access at the eastern side of the site, adjacent to Honeysuckle Cottage. The gradient of the site raises to the north, sloping down to the highway and existing properties. A Public Right of Way runs along the outside of the western border.

There are a number of overhead powerlines which run through the site and the village sign (to remain) is situated centrally within the site frontage.

The site is currently in agricultural use and there is no relevant planning history.

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Appraisal:
Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that an application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. In this case, the Development Plan is the Suffolk Coastal District Local Plan which comprises the Core Strategy and Development Management Policies, adopted in July 2013 and the Site Allocations and Area Specific Policies DPD. The Local Plan was adopted as being in general compliance with the National Planning Policy Framework ('the Framework').

Principle of Development:
It is noted that the site has been allocated within the new Suffolk Coastal District Coastal Local Plan, Policy SCLP12.54, which is due to be examined by Inspectors in Summer 2019. 0.43 ha of land north of The Street, Kettleburgh, as shown on the Policies Map, is identified for the development of approximately 16 dwellings. Whilst it is noted that the size of the site has been reduced through the pre-application process, the Policy allows for approximately 16 dwellings. Policy SCLP12.54 states, development will be expected to accord with the following criteria:
a) Provision of terraced and semi-detached homes fronting The Street to follow the line of existing buildings;
b) Provision of affordable housing on site;
c) Provision of a contribution towards a new early years setting;
d) Design, layout and landscaping to respond to the site's location in the river valley;
e) Retention of hedgerows and trees bordering the site, subject to the provision of safe access and egress. Where hedgerow removal is required replanting elsewhere on the site will be required;
f) Provision of a survey detailing the likely ecological impact on the biodiversity of the site and surrounding area;
g) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity or that capacity can be made available; and
h) Retention and enhancement of Kettleburgh village sign in order to create a central focal point in the village.

Given that the above plan is still in draft and that Policy SCLP12.54 does not currently have any weight, the proposal has been considered in accordance with the current adopted policies, of which any premature planning application would be considered against.

The site is not located within a physical limits boundary, the nearest being Brandeston (Local Service Centre) to the west or Framlingham (Town) to the east. Kettleburgh is defined by Policy SP19 (Settlement Hierarchy) as being an 'other village,' which is a settlement with few or minimal facilities.

Development Management Policy DM4 (Housing in Clusters in the Countryside) states that proposals for new dwellings within 'clusters' will be acceptable, subject to satisfying the following criteria:
(a) The scale of development consists of infilling by one dwelling or a pair of semi-detached dwellings within a continuous built up frontage;

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(b) It would not cause undue harm to the character and appearance of the cluster or any harmful visual intrusion into the surrounding landscape;
(c) Particular care will be exercised in sensitive locations such as conservation areas, the Area of Outstanding Natural Beauty and Special Landscape Areas; and
(d) The cumulative impact of proposals will be a major consideration.

Whilst the site would infill an existing line of dwellings adjacent to the highway with more than 5 no. dwellings, the site is located more than 150m from the edge of an existing settlement (which is identified as a Major Centre, Town, Key Service Centre or Local Service Centre). As there is no footway link to these centres, the distance cannot be extended to 300m. Therefore, the proposal is not compliant with the definition of 'cluster' as set out within Policy DM4.

The new Suffolk Costal Local Plan (due to be examined by the Planning Inspectorate in Summer 2019) Policy SCLP5.4: Housing in Clusters in the Countryside alters the criteria set out in the existing DM4 Policy, although the final wording of this policy is still subject to examination. The proposal would equally not comply with Policy SCLP5.4 as currently proposed. Policy DM3 (Housing in the Countryside) and SP28 (Other Villages) further confirms that housing will primarily be directed to settlements within established physical limit boundaries. The strategy for new housing in 'Other Villages' is strictly controlled and limited to replacement dwellings (on a one to one basis), the sub-division of a larger dwelling (to meet a local need) or the conversion of an existing building (subject to certain controls). The proposed development is none of the above, therefore contrary to Policy SP28 and DM3.

Strategic Policy SP15 - Landscape and Townscape seeks to protect and enhance the landscape character areas of the district. Where sites, gaps, gardens and spaces that make an important contribution to a particular location in their undeveloped form will be identified and protected. The site does lie within a Special Landscape Area, therefore Policy SSP38 is applicable. For the above reasons the proposal would be considered contrary to the current adopted Policies and therefore not acceptable in principle.

Design
In terms of design (and in accordance with the criteria of the emerging policy), the indicative site layout, forms a linear pattern of development, which is relatively in-keeping with the adjacent dwellings. However, for absolute coherence, the building line should be reconsidered (set back to the western side of the site, and abutting the highway to the east, with a more natural flow through the site). As proposed the dwellings to the west are all set back behind the existing building line, with those to the east being considerably further forward, appearing almost as two separate developments.

The dwellings appear disproportionate in scale to the existing dwellings, particularly plots one and nine. Plots two-five are somewhat more in-keeping with the majority of properties in The Street and are a favourable element of the proposal. The other plots should be more reflective of this type of dwelling and if of similar scale, more dwellings could be provided on site, to accord with the emerging policy. SCLP12.54 further reaffirms that dwellings should be terraced and semi-detached homes which front The Street to follow the line of existing buildings.
The site feels further divided by the two proposed accesses; acceptability would be subject to consultation with the County Highways Authority.

The access to the west sits centrally to the dwellings, with wide frontage highway/manoeuvring space and parking to the sides of the dwellings; this appears quite prominent in the landscape, with a considerable amount of hardstanding/paving proposed. Dwellings to the east access the site through a off-centre access which runs between the larger dwellings to the west and the smaller units to the east. Rear parking is proposed; whilst preferable to frontage parking, there is concern that these spaces will not be utilised in preference for parking along the access.

As proposed the rears of the property would have a more active frontage. Whilst some rear parking is acceptable, if possible some of this should be replaced with side parking. (It is also noted that plot nine has tandem parking, which is not supported by the County Highways Authority).

There seems to be a gap in the proposed planting to the north of the site, to land also within the applicants ownership. It should be confirmed whether this is for maintenance of the existing agricultural land, as currently appears to be a potential second phase of development, which would potentially be the difference in numbers provided under the policy (9 proposed - 16 in the policy) but does fall outside of the area allocated under Policy SCLP12.54.

Whilst it is noted there are some large dwellings in larger plots, these are more scattered throughout the village, usually in-between clusters of semi-detached or terraced dwellings. It would be preferable in this instance to have a similar design of dwellings on the western part of the site, to those proposed in plots two-five.

The applicant may wish to reconsider the amount/sizes of units proposed to give a better flow to the development, which reflects the existing streetscene.

The gables of plots seven and eight appear quite prominent in comparison to the existing dwellings along The Street, which are predominately of chalet-bungalow design. Whilst a mix which incorporates bungalows are preferable on larger schemes, given that the site proposes 9 no. dwellings and there are no bungalows in the immediate streetscene of the site, the proposed bungalows appear overly large and intrusive in the streetscene. If the applicant wishes to include bungalows, it is suggested that these are presented in a style more in-keeping with the surroundings, or of an alms-house design.

In terms of provision of affordable units, Policy SCLP12.54 required affordable housing, however it is noted that the amount of dwellings provided has been reduced. Emerging Policy SCLP5.10 (Affordable Housing on Residential Developments Proposals) confirms that residential development with capacity for ten units or more on sites of 0.5ha 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. Provision is expected to be made on-site, unless it can be demonstrated in exceptional circumstances that it is not feasible or practical to provide the units on site in which case it may be agreed that a commuted sum could be paid towards provision of affordable housing outside of the site. Although the site area is currently under that required to provide

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affordable units (4.3ha), the applicant should be aware that any increase in units may require the provision of affordable housing. Further details of housing mix for market and affordable dwellings are available in both the emerging and adopted plans.

The indicative landscaping shows trees in the frontage and some trees on plot. It is not desirable to include trees on plot (unless existing) as they may be removed by future homeowners. Policy SCLP12.54 also requires all existing trees/hedgerows to be retained. In terms of boundary treatments, the plots to the west abut the hedgerow proposed along the rear of the site. It is likely that permitted development rights would be removed for these properties to prevent the erection of fencing in this sensitive location. No details of boundary treatment for the plots to the east has been shown.

The proposal would also be CIL and RAMS liable.

Whilst the indicative plan does meet some of the criteria of the emerging policy, changes are required to further make the scheme policy compliant. Therefore, the principle of development in its current form is not acceptable in accordance with the adopted and emerging policy, should an application be presented it is not felt that officers could provide support in this instance.

**Planning policy**

SP28 Other Villages (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
DM3 Housing in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
DM4 Housing in Clusters in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
DM21 Design: Aesthetics (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
DM22 Design: Function (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
DM19 Parking Standards (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)


**Related applications:**

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<th>Reference no</th>
<th>Proposal</th>
<th>Decision</th>
<th>Date</th>
</tr>
</thead>
</table>

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Constraints
Ancient Monument - Location: Moated site 135m north of St Andrew's Church
Community Infrastructure Levy - Name: Community Infrastructure Levy Charging Zone High
Suffolk Coastal Local Plan - Name: SSP38 Special Landscape Area
DC Case Points - DC Reference: A/C 254
EA - Ground Water Flood Data - Flood Type: Clearwater
EA - Surface Water Flood Data - Area: 36415422.2911654
Public Rights of Way - Route Code: E-351/019/0
Recreational Disturbance Avoidance - Name: Recreational Disturbance Avoidance And Mitigation Strategy

As with all pre-application advice, the Council is not bound with regard to its final decision on any future application. Please note – this pre-application advice is given on the basis of National and Local Planning Policies applicable on the date the advice is given.

Additional Planning and Building Control information can be found online at www.planningportal.gov.uk. If a planning application is needed online applications can be submitted at the same address.

Case Officer: Natalie Webb, Area Planning and Enforcement Officer, 01394 444275
Authorising Officer: Michaeille Coupe, Senior Planning and Enforcement Officer, (01394) 444440

Philip Ridley BSc (Hons) MRTPI | Head of Planning & Coastal Management
East Suffolk Council
Appendix 2

Childcare Sufficiency Assessment
Childcare Sufficiency Assessment (CSA)

Suffolk County Council
Early Years and Childcare Service
places. However, because Brandon closely borders Norfolk some children may be accessing childcare provision in this county.

There are a considerable number of people employed in the horseracing industry in Newmarket. This employment places demand for a more bespoke offer of childcare hours. Families often require childcare early in the morning and again early in the afternoon. However, because Newmarket closely borders Cambridgeshire some children may be accessing childcare provision in this county. In Severals ward, £26,641 developer contributions was used towards the creation of 37 full time equivalent places. In Exning ward, £6,185 was used towards the creation of 36 full time equivalent places.

Section 1.04 Cluster Sufficiency Overview Framlingham and Leiston

Table 1 No. of providers for cluster

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<thead>
<tr>
<th>Provider Type</th>
<th>LOP</th>
<th>Non LOP</th>
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<tbody>
<tr>
<td>Childminder</td>
<td>14</td>
<td>8</td>
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<tr>
<td>Day Nursery</td>
<td>5</td>
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</tr>
<tr>
<td>Nursery Units of Independent Schools</td>
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<td>0</td>
</tr>
<tr>
<td>Pre-School Playgroup</td>
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December 2018

Page 39 of 71
Maintained Nursery School / Academy Nursery Class

<table>
<thead>
<tr>
<th></th>
<th>3</th>
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</thead>
<tbody>
<tr>
<td>Out of School Care</td>
<td>0</td>
<td>5</td>
</tr>
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</table>

*Data Source: Cluster work spreadsheet and school census*

Table 2 Places available for cluster (LOP only)

| Total Baseline Population (eligible 2s plus all 3 and 4yr olds) | 617 |
| Total Number of 15 hr places needed (baseline plus 30 hours projection) | 893 |
| Total places | 959 |
| Diff / places available | 66 |

*Data Source: SCC Sufficiency spreadsheet*

Table 2a Places available for cluster (LOP only) with migration considered

| NET Migration | -4.08% |
| Total Baseline Population (adjustment with migration considered) | 591 |
| Total Number of 15 hr places needed (adjustment with migration considered) | 856 |
| Total Places | 959 |
| Difference / places available | 102 |

* A positive number means more children migrated into the cluster for places than migrated out. A negative number means more migrated out.

Table 3 Current take up for cluster

| Eligible 2yr olds | 93% |
| 3yr olds | 95% |
| 4yr olds | 112% |

*Data Source: SCC take up data Summer 18*

Framlingham/Leiston Cluster consists of 7 wards, Aldeburgh, Framlingham, Leiston, Hacheston, Saxmundham, Peasenhall and Yoxford and Wickham Market. This is predominantly a rural cluster with the main arterial road, A12 dividing it. There is a surplus of 66 places. After taking migration of children in and out of the cluster into consideration, there is a surplus of 102. This is because 15% of children living in this cluster migrate out. Children tend to migrate to Woodbridge and Kesgrave and High Suffolk. Only 9.59% of children attending provision in this cluster come from other clusters. The surplus of places is not necessarily in areas where they are needed.

There are two main factors to consider as to why the 4 year old take up exceeds 100% of the 4 year old population. One is that some children will be migrating from another cluster to access provision in this cluster. These children are not included in the population. Secondly ONS population data is used as a baseline and there may be an underestimate of the number of 4 year olds living in this cluster. Suffolk’s overall take up for 4 year olds is currently 94%.

Take up of places for 2 year olds exceeds Suffolk’s overall take up, currently 79%. 3 year olds also exceed Suffolk’s overall take up, currently 94%.
In the Cluster two new providers, term time only, opened in the Summer 2018, one a daycare provider providing 12 places and another a school nursery. Recent work in Saxmundham created 24 full time equivalent places, all year round from September 2018. This was partly funded by developer contributions, £79,736. All provision in the Saxmundham area is all year round.

In the Framlingham ward there is no group provision operating all year round. The school nursery is mornings and lunch only. A new provider which would provide 28 early education places all year round, 8 a.m.-6p.m. is planning to open in January 2019. Another provider is planning to move into this ward from a neighbouring ward. Work has not yet started on this site. This provision would also provide all year round childcare. Three Ofsted registered childminders are planning to offer early education in the future and support is currently being provided to enable this to happen. Term time only provision is also considering offering a holiday club. SCC is currently working to develop places in wards with high demand or where there is additional housing growth new places are being developed