

## **Committee Report**

**Item No:** 2

**Reference:** DC/17/06037

**Case Officer:** Samantha Summers

**Ward:** Holbrook

**Ward Member/s:** David Rose

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### **Description of Development**

Erection of up to 30 dwellings.

### **Location**

Land to the north of Woodlands Road, Holbrook IP9 2PS

**Parish:** Holbrook

**Site Area:** 1.72ha

**Conservation Area:** Not in Conservation Area

**Listed Building:** Not listed

**Received:** 05/12/2017

**Expiry Date:** 26/02/18

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**Application Type:** Outline Planning Permission

**Development Type:** Small Scale Major Dwellings

**Environmental Impact Assessment:** N/A

**Applicant:** Mr J A Suckling

**Agent:** Peter Wells Architects Ltd

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## **DOCUMENTS SUBMITTED FOR CONSIDERATION**

This decision refers to the Site Location Plan PW858\_PL02 (received 05/12/2017) as the defined red line plan with the site shown edged red. Any other drawing showing land edged red whether as part of another document or as a separate plan/drawing has not been accepted or treated as the defined application site for the purposes of this decision.

The plans and documents recorded below are those upon which this decision has been reached:

Planning Application Form - Received 05/12/2017

Site Location Plan PW858\_PL02 - Received 05/12/2017

Preliminary Access Proposal IP16\_194\_11\_SK001 - Received 05/12/2017

Ecological Appraisal - Received 05/12/2017

Design and Access Statement June 2017 - Received 05/12/2017

Flood Risk Assessment - Received 05/12/2017

Phase 1 Contaminated Land Assessment - Received 05/12/2017

Existing site plan pw858\_pl01 - Received 05/12/2017

Highway access and visibility – received 30/01/18

Speed survey data – received 30/01/18

The application, plans and documents submitted by the Applicant can be viewed online at [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk).

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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The application is referred to committee for the following reason:

It is a 'Major' application for:

- a residential development for 15 or more dwellings.

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## **PART TWO – APPLICATION BACKGROUND**

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### **History**

The subject site forms part of a broader site (SS0201) allocated in the Draft SHELAA (August 2017). In respect to development suitability the Draft SHELAA states:

*'Site is potentially suitable, but the following considerations would require further investigation:*

*Highways – regarding access, footpaths and infrastructure required.*

*Heritage - Impact on nearby listed building will need to be considered.*

*Compatibility - appropriate design would need to be considered with regards to providing a natural buffer between development and open countryside.*

*Townscape - partial development may be more appropriate and supportable.'*

There have been no previous planning applications relating to the site.

### **All Policies Identified as Relevant**

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. Highlighted local and national policies are listed below. Detailed assessment of policies in relation to the recommendation and issues highlighted in this case will be carried out within the assessment:

### **Summary of Policies**

NPPF National Planning Policy Framework

#### **Babergh Core Strategy 2014**

- CS1 Applying the Presumption in favour of sustainable development in Babergh
- CS2 Settlement Pattern Policy
- CS3 Strategy for Growth and Development
- CS11 Strategy for Development for Core and Hinterland Villages
- CS15 Implementing Sustainable Development in Babergh
- CS18 Mix and Types of Dwellings
- CS19 Affordable Homes
- CS21 Infrastructure Provision

### Babergh Local Plan Alteration No.2 (2006)

- HS32 Public Open Space (New Dwellings and Sites up to 1.5ha)
- CN01 Design Standards
- CR07 Landscaping Schemes
- TP15 Parking Standards – New Development

### Supplementary Planning Documents

- Suffolk Adopted Parking Standards (2015)
- Rural Development and Policy CS11 (2014)
- Affordable Housing (2014)

### List of Other Relevant Legislation

- Human Rights Act 1998
- Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
- Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
- The Conservation of Habitats and Species Regulations 2010
- Localism Act
- Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

### Previous Committee / Resolutions and Any Member Site Visit

None.

### Pre-Application Advice

Pre-application discussions held between the applicant and Holbrook Parish Council.

### Consultations and Representations

During the course of the application consultation and representations from third parties have been received. These are summarised below.

#### A: Summary of Consultations

##### **Freston Parish Council**

We do not support this application as to drive to this location the main route is via Freston x-roads (Junction of B14506 and B1080) and this junction is unsafe. We have had our bus shelter run into again. Appeal Ref: APP/D3505/V/05/1185675 cited in support of highways/access objection.

As neither SCC nor any developer provided a plan that is safe for our residents Freston Parish Council commissioned a report in 2012 from the internationally renowned Ove Arup and Partners Ltd. This sets out the safety problems and suggestions to address these problems. There is a copy of this report both with SCC and BDC.

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Since 2012 BDC have granted applications to build more houses in Holbrook and Shotley but have failed to come up with a solution for Freston X-roads. Yet again our bus shelter has been run into.

### **Holbrook Parish Council**

Object on following grounds: (a) Site location; (b) Sustainability; (c) Character and appearance of landscape; (d) Highways; (e) Heritage; and (f) Area of outstanding natural beauty.

### **Stutton Parish Council**

Stutton Parish Council recommends Refusal for the above application.

Woodlands Road is a natural boarder for the village envelope and this should form the boundary for any future development.

The Road and junction on to the B1080 is a single carriage way already serving a high number of vehicles and is often grid locked at school dropping off and picking up times.

The field is good quality agricultural land and should be used for food production not built on.

With the number of additional housing (both proposed and being built) with in the surrounding area, the infrastructure and services will be stretch beyond their capacity.

### **Tattingstone Parish Council**

Tattingstone Parish Council does not support this application on the following grounds:

Schools in the area, both primary and secondary, have not got the capacity for further pupils. The doctor's surgery at Holbrook, which covers not only Holbrook but surrounding villages, has little or no capacity for more patients.

Holbrook already has had a large development at Admiral's Reach which has put a immense strain on the infrastructure.

Surrounding lanes are very narrow, access of more vehicles onto A137 is liable to cause more delays both at Manningtree and at Wherstead junction with A14. This is particularly true when the Orwell Bridge is closed.

The increased traffic on the A137 directly impacts Tattingstone.

### **SCC Highways**

No objection subject to standard highways conditions.

### **Place Services - Landscape**

1) A Landscape Visual Appraisal will need to be undertaken and submitted as part of this outline application.

2) A landscape strategy needs to be produced which demonstrates how the proposals (including mapping the existing vegetation) link with the surrounding residential and movement network, in order to create an appropriate public realm and provide suitable levels of amenity space.

3) If the outline application is approved, recommendations should be applied to the design of any forthcoming/alternative layout:

- The use of detached garage units is to be re-considered. A better arrangement will help improving the public realm of the street. Sideway facing garages and use of soft materials could contribute in achieving this.
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- Relationship between proposed dwellings and existing settlements along Woodlands Road needs careful design. The current layout does not relate to the existing built and landscape character of front gardens. The submitted layout plan proposes back gardens and associated fencing facing onto Woodlands Road and the removal of existing hedge planting.
- The location of the communal green space in the centre of the site is supported. The central space could be improved further if plots 19-22 are orientated to face the communal green space.
- The site boundaries should respond to the existing landscape character comprising hedgerow trees and hedgerow planting.
- New footpaths and pedestrian routes shall be positioned in such a way to ensure that a degree of passive surveillance is provided.

4) Part of the existing hedge planting along the southern site boundary will be lost to give way to the development. The new proposal shall include its replacement with a new native hedgerow and hedgerow tree planting along this boundary as part of the landscape mitigation strategy.

5) A detailed landscape planting plan, boundary treatment plan and specification, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the outline application is approved.

The Proposed Site Plan PW858\_PL02 shows the areas designated for residential development, parking provision, communal green space and indicative tree planting. The indicative layout fails to suitably demonstrate how the green infrastructure relates to the residential layout. The current layout proposed a communal green space in the centre of the site but appears in conflict with the private areas of some of the proposed dwellings. Some of the proposed residential character doesn't relate to the existing built character along Woodlands Road.

We are however in support of the proposed 3m wide landscape zone around northern and western boundaries. Careful design around the materials, type and height of fencing used to define private and public space will be critical to provide visual continuity with the countryside to the north and west of the site and to ensure the landscape zones are looked after and maintained to support and enhance habitat creation.

The proposals will extend the edge of the village of Holbrook to the north and will impact on the existing settlements to the south of Woodlands Road by removing views to the open countryside from the second floors.

The proposals will include the removal of part of the hedge planting along Woodlands Road and will impact on the existing settlement to the south. The proposals presents opportunities to reinstate a hedgerow planting with a mix of native species along the site boundaries including hedgerow trees which will contribute towards the landscape character of the area while reducing visual impact of the new development and mitigating impact in the rural landscape.

Comments on the re-consultation following the submission of the Landscape and Visual Impact Assessment have not been received at the time of the report being written. A verbal update will be given at the committee meeting.

### **Dedham Vale AONB and Stour Valley Project**

The site is considered to be within the setting of the Suffolk Coast and Heaths AONB and as such we would need to see further information from the applicant which considers how the proposal is likely to impact on the wider landscape setting.

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This is particularly important given the nature of the site and its setting within part of a much larger arable field, with potentially open views into the wider landscape. From the limited information submitted, it appears that it will be difficult for the proposal to satisfactorily fit its landscape context and existing settlement pattern associated with the village so as not to cause an adverse landscape impact. We would advise that a Landscape and Visual Appraisal is carried out to the appropriate GLVIA 3 guidance.

Following receipt of the Landscape and Visual Impact Assessment the following comments have been received.

The site is located on the edge of Holbrook Village, on the northern side of Woodlands Road. Holbrook is classed as a Core Village in the adopted Babergh Local Plan 2011-2031 Core Strategy & Policies (2014). Core Strategy policy CS 11 (Strategy for Development for Core and Hinterland Villages) is supportive of proposals in Core Villages that score positively when assessed against Policy CS15 and the following matters are addressed to the satisfaction of the local planning authority (or other decision maker) where relevant and appropriate to the scale and location of the proposal:

- i) the landscape, environmental and heritage characteristics of the village;
- ii) the locational context of the village and the proposed development (particularly the AONBs, Conservation Areas, and heritage assets);

The site was assessed as part of the Strategic Housing and Employment Land Availability Assessment (SHELAA) in 2017. The SHELAA concluded that the site is potentially considered suitable for residential development, subject to a number of constraints being given further consideration. These constraints were

Highways – regarding access, footpaths and infrastructure required

Heritage - Impact on nearby listed building will need to be considered compatibility - appropriate design would need to be considered with regards to providing a natural buffer between development and open countryside

Townscape - partial development may be more appropriate and supportable.

The SHELAA also considered that only the southern part of the site was potential suitable for development in order to avoid disproportionate development to the existing settlement.

The SHELAA is the LPA's assessment of sites submitted through the Call For Sites process.

The SHELAA process does not confer any status in planning terms onto the site and as it stands the site is an unallocated greenfield site.

The proposal site falls within the setting of the Suffolk Coast & Heaths AONB. The AONB boundary lies approximately 2km south of the site.

Policy CS15: Implementing Sustainable Development in Babergh requires proposals for development to respect the local context and character of the different parts of the district, and where relevant demonstrate how the proposal addresses key issues and contributes to meeting the objectives of this Local Plan. It requires all new development within the district, to demonstrate the principles of sustainable development when assessed against the presumption in favour of sustainable development. Under this policy, where appropriate the scale and nature of the proposal, should:

- i) respect the landscape, landscape features, streetscape / townscape, heritage assets, important spaces and historic views;
- ii) make a positive contribution to the local character, shape and scale of the area;

To satisfy the above Core Strategy policies, and objectives 2.7 and 2.8 of the Suffolk Coast & Heaths Management Plan (2013-2018), the proposal must not affect the natural beauty and special qualities of the Suffolk Coast & Heaths AONB.

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The site falls within the Estates Farmland Landscape Character Type which is predominantly an arable landscape, with distinctive field patterns delineated by significant hedgerows, pockets of ancient woodland and windy lanes. The landform dips gently into a dry shallow valley to the north east of the site between Holbrook and Woolverstone.

The above proposal, if approved would extend development into open countryside on the northern side of Woodland Road which to date appears to have acted as a constraint to village expansion. The more recent developments in Holbrook i.e. in the vicinity of Grove Farm are confined to the southern side of the public footpath leading to the farm and on the east side of Ipswich Road as infill.

The AONB team has concerns about the design of the proposed development which has an estate/urban form and is not considered to reflect local built character or settlement pattern of the surrounding dwellings.

Long views of the proposal site from the south west across the valley from Harkstead Lane and the public footpath running south west to Grove Farm (viewpoint A) are limited due to the gently undulating landform and the established network of hedgerows and clusters of ancient woodlands.

The development however would be clearly visible from the PROW (viewpoint B), with the view for those using this PROW, altered from an agricultural landscape with few buildings, to a more urbanised character. This impression of urbanisation would be intensified when viewed cumulatively with the development south west of Grove Farm.

On the approach to Holbrook village, from the north, views into the site from Ipswich Road (B1080) are partially limited by the mature hedgerow running parallel to the highway. The site however is very visible from Woodland Road and from the PROW running northwards towards Potash Farm. (viewpoint B)

Given its plateau position, if approved this development would result in a change in the landscape character on the northern edge of Holbrook from an agricultural landscape with open views across the countryside to a more enclosed urban character. It would also set a precedent for development to the north of Woodlands Road. The AONB team does not consider that the proposed green infrastructure, open space and landscaping would soften the visual impact of this development sufficiently to minimise the urbanising effect on the setting of the AONB, particularly when viewed cumulatively with other recent developments in the village.

For these reasons the proposal is not considered to accord with Core Strategy policies CS 11 (criteria i and ii) and CS15 (criteria i and ii) or the objectives 2.7 and 2.8 of the Suffolk Coast & Heaths Management Plan (2013-2018) and as such it not will help contribute to the protection of the landscape and scenic beauty or special qualities within the AONB Additional Project Area.

The AONB team therefore object to the above proposal. If the LPA is mindful to approve the outline application, the AONB team would welcome the opportunity to comment on future Reserve Matters applications related to this development.

### **BMSDC – Heritage Team**

The heritage concern relates to the impact of the proposed development on the setting of the nearby designated heritage assets. These are the grade II listed Cherry Ground to the west of the proposed site and the grade II listed Potash Farm and scheduled ancient monument (SAM) further to the north of the site.

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Whilst the setting to Potash Farm and the SAM contribute notably to their significance, it is considered the current proposal would have a negligible impact on their settings, and therefore on their significance.

However, Cherry Ground sits prominently adjacent to the open farmland that the proposed site is a part of, and it probably has a strong historic agrarian connection to it, which has not been visually interrupted by modern development. This farmland could thus be recognised as essential to its setting and the way the building is experienced in its surroundings, and therefore its significance.

The proposed development of the south-eastern corner of this field would sufficiently suburbanise the rural setting of the listed building such that it would not work to preserve or enhance its significance as required by the NPPF and LBA.

The Heritage Team therefore considers that the proposal would cause a low to moderate level of less than substantial harm to the setting of the listed building.

### **Anglian Water**

No objection.

### **Environmental Health - Sustainability**

We have reviewed this application and cannot see any attempt at mitigation of environmental impact proposed. It is acknowledged that the application is for outline permission but this council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability.

Some environmental measures such as orientation, renewables etc will affect the design and layout of the development and so should be considered at the earliest stage.

We recommend refusal of permission until appropriate information to address policies CS12, 13 & 15 is received, should the planning department be mindful to grant outline permission we would wish to impose a suitable condition and request we are consulted in this process.

### **Environmental Health - Other**

No objection subject to construction hours condition.

### **Environmental Health - Land Contamination**

No objection.

### **SCC Fire Officer**

No objection.

### **Place Services - Ecology**

No objection subject to conditions to secure: (a) A proportionate financial contribution towards visitor management measures for the Orwell Estuary SPA/Ramsar; (b) Ecological mitigation and enhancements.

### **Natural England**

This development falls within the 13 km 'zone of influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). It is anticipated that new housing development in this area is 'likely to have a significant effect' upon the interest features of the aforementioned designated site(s), when considered in combination, through



increased recreational pressure. As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development to enable you to reach a conclusion of “no likely significant effect” whilst ensuring that the delivery of the RAMS remains viable. If this does not occur in the interim period then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMs is adequately funded. We therefore advise that you should not grant permission until such time as this mitigation measure has been secured.

Providing appropriate mitigation is secured to avoid impacts upon the European site occurring there should be no additional impacts upon the SSSI interest features of Stour Estuary.

### **SCC - Archaeological Service**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record, within an area of known cropmarks (FRT 006). Further cropmarks are recorded surrounding the site, which is in a topographically favourable location for archaeological activity from all periods. A Neolithic causewayed enclosure, which is a Scheduled Ancient Monument, is recorded to the north (FRT 005), and prehistoric archaeology has been defined during recent archaeological investigations to the south-west (HBK 064). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any surviving archaeological remains.

There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

### **SCC - Flood and Water**

Holding objection subject to submission of infiltration tests.

### **BMSDC Economic Development**

No objection.

### **Environment Agency**

No objection.

### **BMSDC Strategic Housing**

Taking into account the needs information detailed above the proposed affordable housing mix is acceptable to the Council.

### **B: Representations**

Numerous objections received. Summary of grounds of objection:

- \*Impact on character and appearance of the area
  - \*Impact on the village setting
  - \*Impact on the setting of nearby listed buildings
  - \*Impact on AONB.
  - \*Inaccurate traffic survey
  - \*Impact on highway safety, in particular already unsafe Woodlands Road and Ipswich Road intersection.
  - \*Impact on amenities - doctors and schools at capacity
  - \*Loss of prime agricultural land
  - \*Loss of hedgerow.
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- \*Absence of site screening.
- \*Impact in Woodlands Road residents through loss of sunlight, daylight, outlook and privacy.
- \*Outside village development boundary.
- \*Prematurity - site should not be developed until the District plan has gone through the consultation process.
- \*Unsustainable location.
- \*Site isolated from village.

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## **PART THREE – ASSESSMENT OF APPLICATION**

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From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.

### **1. The Site and Surroundings**

- 1.1. The application site is located on the north-western corner of Woodlands Road and Ipswich Road (B1080), on the northern periphery of the village of Holbrook. Holbrook is defined as a 'Core Village' in the Babergh District Local Plan Core Strategy 2014. Woodlands Road forms Holbrook's northern Built Up Area Boundary (BUAB).
- 1.2. The site comprises agricultural land (Grade 2). Land to the north, west, east and south-east also comprises agricultural land. Land to the south, on the opposite side of Woodlands Road, is largely residential in nature, forming the main body of the village. Hedging and trees line the eastern and southern site boundaries.
- 1.3. Grade II listed buildings are located west and north of the site. Cherry Ground, fronting Woodlands Road, is located approximately 245m west of the site. Potash Farm, fronting Ipswich Road, is located approximately 380m north of the site. A Scheduled Ancient Monument (HE ref 1005982) comprising an interrupted ditch system, is located further north of Potash Farm, and extends over both sides of Ipswich Road.
- 1.4. The site is not in a Conservation Area, Special Area of Conservation or Special Landscape Area. The Dodnash Special Landscape Area is located approximately 435m west of the site.
- 1.5. The Suffolk Coast and Heaths AONB is located approximately 2km south of the site.
- 1.6. There are no footpaths along Woodlands Road or Ipswich Road adjacent the site. Two bus stops are located on Ipswich Road at its junction with Woodlands Road. Two oak trees on the southern side of Woodlands Road adjacent an elderly care centre are subject to Tree Preservation Orders.

### **2. The Proposal**

- 2.1. Outline planning permission with all matters reserved is sought for up to 30 dwellings. Ten of the dwellings are proposed as affordable. Density and scale details are not provided given the outline nature of the application.

2.2. An indicative layout has been provided to demonstrate how the site could develop if outline permission is granted. Key elements of the indicative outline are as follows:

- Single access point from Woodlands Road to serve the development. No vehicle or pedestrian access from Ipswich Road.
- Internal road set around a central green public open space.
- Some properties feature dual frontages with both Woodlands Road and Ipswich Road.
- The affordable dwellings located as a group to the southern end of the site.
- Hedgerow removal along Woodlands Road (approximately half of road frontage) to accommodate proposed footpath.
- Retention of hedgerow and trees along Ipswich Road.
- A 3m landscaped zone to the north and west site boundaries.

### **3. National Planning Policy Framework**

3.1. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.

3.2. The following paragraphs of the NPPF are considered applicable:

Para 6: Achieving sustainable development

Para 7: Three dimensions to sustainable development

Para 11 - 15: The presumption in favour of sustainable development

Para 17: Core planning principles

Para 32 and 34: Transport movements

Para 47: Delivering a wide choice of high quality homes (including the need to have a 5-year deliverable supply of housing)

Para 49: All housing proposals should be considered in the context of the presumption in favour of sustainable development.

Para 55: To promote sustainable development in rural areas.

Para 56 & 60: Requiring good design

Para 64: Development of poor design must not be supported.

Para 69: Promoting healthy communities

Para 70: Delivery of social, recreational, and cultural facilities that the community needs.

Para 72: Provision of school places. Para 73: Access to high quality open space. Para 100: Development and flood risk

Para 103: Development and increasing flood risk elsewhere

Para 109: Planning system should contribute to and enhance the natural and local environment.

Para 112 & 117-119: Development affecting protected wildlife

Para 115: Conserving landscape and scenic beauty

Para 123: Planning and noise.

Paras 128 & 129: Describing the significance of a designated heritage asset.

Para 131: Determining planning applications that affect heritage assets.

Para 132: Significance of heritage assets.

Para 134: Development and less than substantial harm

Para 186: Approaching decision taking in a positive way.

Para 187: Local Planning Authorities should find solutions rather than problems in decision taking.

Para 196: Plan led planning system.

Para 197: Assessing and determining application applying the presumption in favour of sustainable development.

Paras 203 -206 - Planning conditions and obligations.

Paras 211 - 212: Using development plans and the NPPF in decision making.

Paras 214 - 215: The weight attached to development plan policies having regards to their consistency with the NPPF.

Para 216 - Weight given to policies in emerging plans

#### **4. Core Strategy**

- 4.1. CS1 Applying the Presumption in favour of sustainable development in Babergh
- CS2 Settlement Pattern Policy
- CS3 Strategy for Growth and Development
- CS11 Strategy for Development for Core and Hinterland Villages
- CS15 Implementing Sustainable Development in Babergh
- CS18 Mix and Types of Dwellings
- CS19 Affordable Homes
- CS21 Infrastructure Provision

#### **5. Supplementary Planning Documents**

- 5.1. Suffolk Adopted Parking Standards (2015)
- Rural Development and Policy CS11 (2014)
- Affordable Housing (2014)

#### **6. Saved Policies in the Local Plans**

- 6.1. HS32 Public Open Space (New Dwellings and Sites up to 1.5ha)
- CN01 Design Standards
- CR07 Landscaping Schemes
- TP15 Parking Standards – New Development

#### **7. Housing Land Supply**

- 7.1. The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites sufficient to provide for five years' worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.
- 7.2. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted.
- 7.3. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However last month, the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has

clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e. it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.

- 7.4. In accordance with National Planning Policy Guidance paragraph 030 the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that '...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...'
- 7.5. The Council published the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) in May 2017 which is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. Therefore, the 5 year land supply has been calculated for both the adopted Core Strategy based figures and the new SHMA based figures.
- 7.6. A summary of the [BDC] Council's 5 year land supply position is:
  - i. Core Strategy based supply for 2017 to 2022 = 4.1 years
  - ii. SHMA based supply for 2017 to 2022 = 3.1 years
- 7.7. The NPPF requires that development be sustainable and that adverse impacts do not outweigh the benefits to be acceptable in principle. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:
  - an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:
  - a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural wellbeing; and
  - an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

- 7.8. In light of all of the above, this report will consider the proposal against the three strands of sustainable development, and also give due consideration to the provisions and weight of the policies within the development plan, in the context of the authority not being able to demonstrate a five year land supply.

## **8. Sustainability of the Proposal**

- 8.1 Policy CS2 designates Holbrook as a Core Village. This policy states that Core Villages will act as a focus for development. Sites outside of a defined settlement form part of the countryside and Policy CS2 limits development in the countryside so that it will only be permitted in exceptional circumstances subject to a proven justifiable need. However, in the absence of a five year housing supply, Policy CS2 is afforded limited weight.
- 8.2 The general purpose of Policy CS11 is to provide greater flexibility in the location of new housing development in the Core and Hinterland Villages. Subject to specified criteria, Policy CS11 intentionally provides greater flexibility for appropriate development beyond the BUAB for each Core and Hinterland Village, as identified in the 2006 Local Plan Saved Policies.

- 8.3 Policy CS11 sets out the Local Plan 'Strategy for Development in Core and Hinterland Villages' and states:

*'Proposals for development for Core Villages will be approved where proposals score positively when assessed against Policy CS15 and the following matters are addressed to the satisfaction of the local planning authority ... where relevant and appropriate to the scale and location of the proposal:*

- 1. The landscape, environmental and heritage characteristics of the village;*
- 2. The locational context of the village and the proposed development (particularly the AONBs, Conservation Areas, and heritage assets);*
- 3. Site location and sequential approach to site selection;*
- 4. Locally identified need - housing and employment, and specific local needs such as affordable housing;*
- 5. Locally identified community needs; and*
- 6. Cumulative impact of development in the area in respect of social, physical and environmental Impacts.*

*The Core and Hinterland Villages identified in the Spatial Strategy provide for the day-to-day needs of local communities, and facilities and services such as shops, post offices, pubs, petrol stations, community halls, etc that provide for the needs of local communities will be safeguarded.*

*New retail, leisure and community uses appropriate in scale and character to the role, function and appearance to their location will be encouraged in Core and Hinterland Villages, subject to other policies in the Core Strategy and Policies document, particularly Policy CS15, and other subsequent (adopted) documents as appropriate.*

- 8.4 The 'Rural Development & Core Strategy Policy CS11 Supplementary Planning Document' ("the SPD") was adopted by the Council on 8 August 2014. The SPD provides guidance on the interpretation and application of Policy CS11, acknowledging that the Site Allocations Document foreshadowed in Policy CS11 may not be prepared for some time. Although not part of the statutory development plan, the SPD has been subject to community consultation, has been adopted by Council and is therefore a material planning consideration that is afforded significant weight.

8.5 The SPD outlines the matters that should be given regard when assessing proposals in Core and Hinterland Villages. Not surprisingly, these matters closely reflect the six matters detailed in Policy CS11. The matters are as follows:

- Site location and relationship to settlement
- Sequential approach to site selection
- Scale of proposal in relation to existing settlement
- Cumulative impact taken with existing commitments or other proposals
- Local needs
- Availability of services and facilities, their ability to expand and the contribution which development would make to their long-term viability
- Social and economic benefits of development
- Constraints and impacts

8.6 Each of the above Policy CS11 criteria are assessed in turn below, with regard given to the further detailed guidance contained in the SPD.

#### The landscape, environmental and heritage characteristics of the village

##### *Impact on Landscape*

8.7 The NPPF emphasises as a core principle the need to proactively drive and support sustainable development to deliver homes. It states that both the intrinsic character and beauty of the countryside should be recognised and that pursuing sustainable development involves widening the choice of high quality homes. The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

8.8 These comments need to be taken into account in the light of the provisions of the NPPF, most notably paragraphs 115 and 116 which state;

“115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.

8.9 In the Court of Appeal judgement in R (on the application of Cherkley Campaign Ltd) v Mole Valley District Council [2014] PLSCS 138, the judge found that “I see no good reason for departing from the language of paragraph 116 itself.

The paragraph provides that permission should be refused for major developments “in” an AONB or other designated area except where the stated conditions are met: the specific concern of the paragraph is with major developments in a designated area, not with developments outside a designated area, however proximate to the designated area they may be”.

- 8.10 In this instance, the proposal does not fall within the AONB. As such, paragraph 116 is not engaged.
- 8.11 Notwithstanding this, it is necessary to consider the impact of the development on views into and out of the AONB, with particular regard to policy CR02 and paragraph 115 of the NPPF. Paragraph 115 and Policy CR02 bring about different tests in respect of the consideration of development in the AONB. Paragraph 115 provides that great weight should be given to “conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty” whilst policy CR02 requires that “there is an overriding national need for developments that have a significant impact in the particular location and that there are no alternative sites available”.
- 8.12 Whilst the requirements set out within the policies are different, it is apparent that the aims of these policies are to conserve the landscape and scenic beauty of the AONB (paragraph 115), ensure that in instances where there is a significant impact that there is a demonstrable national need and that no alternative sites are available (CR02). As such, the developments impact on the AONB will now be considered against these provisions.
- 8.13 The Planning Practice Guidance advises that ‘The opportunity for high quality hard and soft landscaping design that helps to successfully integrate development into the wider environment should be carefully considered from the outset, to ensure it complements the architecture of the proposals and improves the overall quality of the townscape or landscape’.
- 8.14 The greenfield site contributes positively to the rural character of the area. It is inevitable that developing an open field for housing will have some adverse impact on the openness and character of the site. However, Policy CS11 envisages that there will be some development in the countryside; the key question is whether the character impact of the development is reasonably contained.
- 8.15 Land to the west and north comprises agricultural fields. Likewise, land to the east and south-east is also open countryside. The character is very much rural, comprising expansive views and offering a genuine sense of openness. This contrasts starkly with the suburban character south of Woodlands Road and west of Ipswich Road. Development here is very much ‘conventional residential’ in appearance, with standard plot sizes and the usual detached ribbon-like arrangement commonly found in villages and towns across rural England.
- 8.16 New built development in place of open, agricultural fields is a substantial character shift. Residential development of the density envisaged would detract from the open countryside setting and from the rural approach to the village. The indicative proposal seeks to provide for a landscape character commensurate with the broader landscape setting however it is not considered that this is sufficient to offset the visual intrusion and suburbanising effect that will result. The development will be highly prominent, extending the body of the village well into open countryside where new visual boundaries will be created, adversely impacting the rural character of the village entrance. Creation of new boundaries at the northern and western rural interfaces is an unfortunate character outcome.



- 8.17 In creating a footpath on Woodlands Road the proposal will result in loss of a significant amount of existing hedgerow. Replacement planting will offset this loss to some degree, however the landscape character impact, whilst localised, will nonetheless cause significant harm.
- 8.18 As noted by Council's landscape consultant, the indicative layout does not relate to the existing built and landscape character south of Woodlands Road. The indicative layout plan proposes back gardens and associated fencing facing onto Woodlands Road and the removal of existing hedge planting. This represents a poor design response, failing to take account of the existing prevailing residential character to the south. In this respect the proposal fails to respond positively to Policy CN01. This said, this is a detailed design matter and one that could be readily addressed at the reserved matters stage of the approvals process. The layout submitted is, after all, only indicative. This element of the proposal is not fatal to the merits of the outline application.
- 8.19 On balance, it is concluded that the visual impact of the development on the character and appearance of the area is significant.

#### *Impact on Heritage Assets*

- 8.20 By virtue of the legal duty in section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Building Act"), "in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".
- 8.21 Grade II listed buildings are located west and north of the site. The separation distances to these heritage assets are generous. Whilst the development may form somewhat of a suburban backdrop to both listed buildings, the separation distances are such that the impact on the settings of both buildings will not be unacceptable. Council's Heritage Team consider the proposal will have a negligible impact on the setting of Potash Farm and the Scheduled Ancient Monument located further north. The Heritage Team consider there will be a suburbanising effect on the rural setting of the western listed building but that overall, the proposal would cause 'a low to moderate level of less than substantial harm to the setting of the nearby listed buildings'.
- 8.22 The rural setting of the western listed building will be impacted, this is acknowledged. However, as noted, the separation distance between the development and the listed building is such that the impact will not affect the listed setting to an extent that is considered unacceptable. A 245m wide open field between the subject site and western listed building will be retained, a significant visual buffer and one that sufficiently retains the rural setting of this listed building.
- 8.23 There are no Conservation Areas in proximity of the application site. The proposal will not cause any harm to any Conservation Area.
- 8.24 The site lies in an area of archaeological potential and the County Archaeologist requests an archaeological investigation condition should outline permission be granted. This is not fatal to the application.

### *Impact on Environment*

- 8.25 Environmental Health raise no objection to the proposed development from the perspective of land contamination. The proposal complies with criterion vii of policy CS15 insofar as it relates to land contamination.

### The locational context of the village and the proposed development

- 8.26 Paragraph 10 of the SPD states proposals should be well related to the existing settlement and that the starting point for assessing this is whether or not the site adjoins the village BUAB. The SPD states a judgement will need to be made and issues to be taken account include:
- Whether the proposal would constitute ribbon development on the edge of the village
  - How the site is connected to the existing settlement, jobs, facilities and services including location of site access and availability of sustainable transport links
  - The scale, character and density of the proposal in relation to the existing adjoining development.
  - Whether the proposal constitutes a logical extension of the built-up area of the village. Whether the proposal is self-contained and has logical, natural boundaries.
- 8.27 The site adjoins the Holbrook BAUB. The proposal would not constitute ribbon development given the size of the site and likely configuration that would seek to maximise development yield. The site is very well connected to the village, within easy walking distance of all local amenities including schools, recreational facilities and shops. An existing footpath network runs to the site's southern boundary. The proposed scale of development is not at odds with the development pattern on the southern side of Woodlands Road. The proposal responds favourably to the first three issues listed at paragraph 10 of the SPD.
- 8.28 The proposal is not self-contained in a visual sense. Developments that 'square off' the body of a village will often present as discrete additions and are usually visually contained by existing neighbouring development. Not so in this case. To the contrary, the development constitutes a projection out from the body of the village, a projection that will have a substantial contrasting appearance when viewed in the context of the open fields beyond.
- 8.29 There are no ancient woodlands in proximity of the site.
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### Site location and sequential approach to site selection

- 8.30 The acceptability of the principle of development does not turn on whether or not the site is within the BUAB. In this case the site is outside the BUAB.
- 8.31 There are no sites within the Holbrook built up area boundary which would enable a development of a scale commensurate with that proposed.
- 8.32 Case law has clarified that in relation to sequential assessment, there is no requirement to consider alternative sites adjoining the built up area boundary, as sequentially they are within the same tier.

#### Locally identified need - housing and employment, and specific local needs such as affordable housing

- 8.33 'Locally identified need' should be construed as the development to meet the needs of the Core Village and its wider functional cluster.
- 8.34 Policy CS11 allows flexibility for developments of appropriate scale and form to come forward for Core Villages. The Growth and Development Strategy contemplates rural growth, which has been identified locally as important to sustain the existing rural settlement pattern and existing rural communities in the catchment area. The sequential approach of the Strategy for Growth and Development requires new development for "rural growth", first, to be directed to Core Villages, which are expected to accommodate new development in locations beyond existing BUAB, where appropriate.
- 8.35 In respect of affordable housing need, paragraph 2.8.5 of the Core Strategy advises that Policy CS11 will lead to greater flexibility in the provision of affordable housing, related to need which has to be considered more widely than just within the context of an individual settlement but also the other villages within that cluster and in some cases adjoining clusters. This is consistent with the requirements of the NPPF that aim to ensure that the local plan meets the needs for affordable housing in the housing market area. Policy CS18 states that the mix, type and size of housing development will be expected to reflect established needs in the Babergh District.
- 8.36 Paragraph 14 of the SPD states that proposals should be accompanied by a statement that analyses the local housing needs of the village and how they have been taken into account in the proposal.
- 8.37 The application is not supported by a housing needs assessment. As the application is outline, there is no detail regarding the proposed mix of affordable housing types. The proposal merely seeks to provide the 35% of affordable housing required by local policy.
- 8.38 The absence of this supporting detail is not fatal to the proposal. Council's Strategic Housing Officer has detailed the required housing mix and there is nothing before officers to suggest the required mix could not be achieved.

#### Locally Identified Community Needs

- 8.39 The SPD states that proposals should be accompanied by a statement that assesses the community needs of the Village and how they have been taken into account in the proposal. The application is not supported by a community needs assessment. However, the development will generate contributions towards community infrastructure, to be spent on local services and infrastructure. The proposal would deliver benefits through CIL that are considered to satisfy this element of Policy CS11.

#### Cumulative impact of development in the area in respect of social, physical and environmental impacts

- 8.40 In light of the relatively small scale of development proposed, the cumulative impact of the development will be easily accommodated within the existing infrastructure of the village, consistent with this aspect of Policy CS11.

### Policy CS15 Sustainable Development

- 8.41 Policy CS15 sets out how the Council will seek to implement sustainable development. A number of criterion set out at CS15 have already been considered in this report, those that have not are considered further below.
- 8.42 Policy CS15 seeks to minimise the need to travel by car using alternative means and improving air quality. The site is well connected in highway and pedestrian connectivity terms. A good range of facilities, as would be expected in a Core Village, are on offer a short walk from the site, all accessible via an existing footpath network. Amenities include schools, doctors surgery, co-op and sports centre. Bus stops are located at the site's doorstep, providing a good level of public transport accessibility. For these reasons the site represents a sustainable location.
- 8.43 Policy CS15 sets out criteria relating to flooding, economic benefits, supporting local services, sustainable design, and creation of green spaces, minimising waste and surface water run-off and promotion of healthy living. The proposal responds favourably to all of these matters.
- 8.44 Policy CS15 states that with regard to the SPAs, SACs and Ramsar sites, any development that would have an adverse effect on the integrity of a European site including candidate/proposed sites either alone or in combination with other plans or projects will be refused. Natural England recommend a suitable contribution to the emerging Suffolk RAMS should be sought. This could be addressed by planning condition.

### Highway Safety

- 8.45 Numerous objections raise concern regarding highway safety, in particular the safety of the Woodlands Road and Ipswich Road intersection. Residents are critical of the submitted traffic survey and an independent survey has been provided that provides different results to the applicant's survey.
- 8.46 However, SCC Highways raise no objection to the proposal subject to standard highways conditions. It must therefore be concluded that highway safety concerns are not so significant as to warrant a defensible reason for refusal. The proposal accords with criteria xviii and xix of policy CS15.
- 8.47 There is ample opportunity to provide minimum parking requirements for the future dwellings, compliant with the Parking Standards. The proposal accords with Policy TP15.

### Residential Amenity

- 8.48 Paragraph 17 of the NPPF sets out a number of core planning principles as to underpin decision-taking, including, seeking to secure a good standard of amenity for all existing and future occupants of land and buildings.
- 8.49 Separation distances to neighbouring dwellings is such that residential amenity for neighbouring residents will be adequately maintained, consistent with Paragraph 17 of the NPPF.

### Ecology

- 8.50 Saved Policy CS15 of the Core Strategy seeks to protect and enhance biodiversity.

- 8.51 Regulation 9(5) of the *Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010)* requires all 'competent authorities' (public bodies) to 'have regard to the Habitats Directive in the exercise of its functions.' For a Local Planning Authority to comply with regulation 9(5) it must 'engage' with the provisions of the Habitats Directive.
- 8.52 Council's Ecology Consultant agrees with the supporting Ecology Report and recommends conditions regarding Ramsar financial contributions and ecological mitigation and enhancements. These requirements can be addressed by planning condition.

#### Surface Water Drainage

- 8.53 Criteria xi and xii of saved Policy CS15 requires development to minimise the exposure of people and property to all sources of flooding and to minimise surface water run-off and incorporate sustainable drainage systems (SUDS), where appropriate.
- 8.54 The SCC Flood Officer has placed a holding objection subject to submission of infiltration tests. This technical matter could be addressed by planning condition.

#### **9. Planning Obligations / CIL**

- 9.1 The application is liable to CIL which would be managed through the standard independent CIL process.
- 9.2 The application, if approved, would require the completion of a S106 agreement to secure the required number of affordable dwellings, along with mix and tenure, as well as a management plan for the principal public open space.

#### **10. Details of Financial Benefits / Implications (S155 Housing and Planning Act 2016)**

- 10.1 Granting this development will result in the following financial benefits:
- New Homes Bonus
  - Council Tax
  - CIL
- 10.2 These are not material to the planning decision.

#### **PART FOUR – CONCLUSION**

##### **11. Statement Required By Article 35 of the Town and Country Planning (Development Management Procedure) Order 2015**

- 11.1 When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising.

##### **12. Identification of any Legal Implications and/or Equality Implications (The Equalities Act 2012)**

- 12.1. There are no known legal implications derived from the determination of this application.

### **13. Planning Balance**

- 13.1 The Council cannot currently demonstrate a five year housing land supply in the district, as required by the NPPF. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF).
- 13.2 Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted.
- 13.3 The NPPF advises that the environmental aspect of sustainability includes contributing to protecting and enhancing our natural, built and historic environment; economic and social gains should be sought jointly and simultaneously with environmental improvement.
- 13.4 The proposal will bring with it economic benefits. The provision of 30 houses will assist in addressing the housing shortfall. Affordable housing provision is a social benefit. The site is in a sustainable location, a short distance from a good range of local services. Car dependency will be low. Traffic generation may be limited owing to the short distance to local amenities including schools. These elements support Policy CS11 and CS15.
- 13.5 The proposal may cause harm to heritage assets however this harm is not considered substantial. The site is not located in the designated AONB or Special Landscape Area.
- 13.6 The impact on the countryside character at this locale will be significant. The development will appear as a visual intrusion into the countryside, at odds with the rural approach to the village. The proposal will have a suburbanising effect on the rural setting of the village. This aspect of the proposal does not support Policy CS11 or CS15.
- 13.7 Officers conclude that specific policies indicate development should be restricted, in that the first bullet point of Paragraph 109 of the NPPF (that the planning system should protect and enhance valued landscapes) offers a restriction on development in principle and in this instance the proposed development would neither protect nor enhance what is a valued landscape which impacts on views into and out of the AONB.
- 13.8 Therefore, the operation of the presumption in favour of sustainable development does not apply here because the site is a valued landscape and, also noting the detriment posed, specific policies within the NPPF indicate that development should be restricted.
- 13.9 The adverse landscape character impact would significantly and demonstrably outweigh the benefits of the scheme when assessed against the policies of the NPPF when taken as a whole. Therefore the proposal does not constitute sustainable development for which the NPPF carries a presumption in favour and therefore the application is recommended for refusal.

## **RECOMMENDATION**

### **13.10 Refuse planning permission for the following reasons:**

Policy CS2 of the Babergh Core Strategy (2014) states that planning permission will be permitted only in the Countryside in exceptional circumstances subject to proven justifiable need. Policy CS11 requires development to address the locational context of the village, citing in particular the Areas of Outstanding Natural Beauty. Policy CS15 requires new development to demonstrate how the proposal addresses the key issues and objectives identified in the Core Strategy. Policy CR02 of the Babergh Local Plan Alteration No.2 (2006) states unless there is an overriding national need for development having a significant impact in the particular location and no alternative site is available, such developments will not be allowed.

The assessment of the application has identified that the proposal does not comply with the development plan and, notwithstanding that the Council does not have a five year housing land supply, the adverse impact on the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty demonstrably outweigh the benefits of the development when considered against the Framework as a whole (and also where specific policies within the NPPF nevertheless indicate that development should be restricted).