

Committee Report

Item No:

Reference: DC/18/00233

Case Officer: Jo Hobbs

Ward: Bramford & Blakenham.

Ward Member/s: Cllr John Field. Cllr Kevin Welsby

RECOMMENDATION – APPROVE PLANNING PERMISSION WITH CONDITIONS

Description of Development

Outline Application (with access and all other matters reserved) - Residential development of up to 195 homes including affordable homes with areas of landscaping and public open space, new access from Loraine Way and pedestrian and cycle links (Revised application).

Location

Land East Of The Street And Loraine Way, Bramford, Ipswich, IP8 4NS

Parish: Bramford

Expiry Date: 27/03/2019

Application Type: OUT - Outline Planning Application

Development Type: Major Large Scale - Dwellings

Applicant: CEMEX Operations UK Ltd

Agent: Mr Paul Foster, Barton Wilmore

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

It is a “Major” application for:

- a residential land allocation for 15 or more dwellings

Details of Previous Committee / Resolutions and any member site visit

None

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

Core Strategy Focused Review 2012:

FC1 – Presumption in favour of sustainable development

FC1.1 – Mid Suffolk approach to delivering sustainable development

FC2 – Provision and distribution of housing

Mid Suffolk Core Strategy 2008:

- CS1 – Settlement hierarchy
- CS2 – Development in the Countryside and Countryside Villages
- CS3 – Reduce contributions to climate change
- CS4 – Adapting to climate change
- CS5 – Mid Suffolk’s environment
- CS6 – Services and infrastructure
- CS9 – Density and mix (of housing)

Mid Suffolk Local Plan 1998:

- GP1 – Design and layout of development
- HB1 – Protection of historic buildings
- HB7 – Protecting gardens and parkland of historic interest
- HB8 – Safeguarding the character of conservation areas
- HB14 – Ensuring archaeological remains are not destroyed
- H7 – Restricting housing development unrelated to the needs of the countryside
- H13 – Design and layout of housing development
- H14 – A range of house types to meet different accommodation needs
- H15 – Development to reflect local characteristics
- H16 – Protecting existing residential amenity
- CL8 – Protecting wildlife habitat
- CL9 – Recognised wildlife areas
- CL11 – Retaining high quality agricultural land
- T4 – Planning obligations and highways infrastructure
- T9 – Parking standards
- T10 – Highway considerations in development
- T13 – Bus services
- RT4 – Amenity open space and play areas within residential development
- SC4 – Protection of groundwater supplies
- SC8 – Siting of new school buildings
- Altered policy H4 – A proportion of affordable housing in new housing developments (July 2016)

Other relevant material planning considerations

- Suffolk County Council Parking Standards (November 2014)
- Suffolk County Council Minerals Core Strategy 2008 – Policy 5

Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation (2007)

Bramford Parish Plan and Village Design Statement 2012

- Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
- Human Rights Act 1998
- Natural Environment and Rural Communities (NERC) Act 2006
- The Conservation of Habitats and Species Regulations 2010
- Localism Act 2011
- Crime and Disorder Act 1998

Planning History and Pre-application advice

There are no previous related planning applications on this site. There were some permissions relating to the former mineral extraction use to the north of the site, but this use has since ceased. Pre-application advice was sought for a scheme for 250 dwellings in 2017 which identified the principle of development at the site was likely to be acceptable.

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

(NOTE – summaries only, subsequent responses only noted if they raise new points and current consultation expires on 13th March, after publication of this report. Any further comments will be reported in Late Papers)

Bramford Parish Council

1st response: Remote from amenities, no sustainable transport methods available, increased traffic will lead to rat running as people commute to work outside of village, highway safety with people parking on street (existing residents), safety of children at primary school and elderly residents in sheltered housing, pedestrian and traffic calming features to reduce risk and adverse environmental impacts, healthcare provision, school capacity, cumulative highway impact not considered, sewage disposal, sequential and exception test not met, Bramford Village Plan and Village Design Statement 2012 - balance density and promote identity.

2nd response: No reason to oppose, but concern over pedestrian and cycle access given location of site remote from services, maintenance and management of street furniture including lighting, bins etc., maintenance and management of woodland planting, meadows, swales and basins. Concern remains over single vehicular access to site.

Sproughton Parish Council

1st response: Refusal - adverse visual impact on Gipping Valley, increase in traffic movement on High Street, poor design disjointed to village of Bramford, no services or shops or easy access to those in Bramford.

2nd response: Refusal - highway impact (including cumulative with sites in emerging local plan), residential amenity - air quality and noise, personal safety, disturbance and causing community isolation and barriers to social interaction through residents not feeling able to move freely within their community. Concern over piecemeal approach to considering impact of new development in area.

3rd response: Renew objection to these proposals due to additional traffic travelling through Sproughton on the already congested B1113 corridor which will in turn cause unacceptable impacts on traffic volume, congestion, air quality and noise on a section of road which is already at capacity. Lack of strategic overview as to the cumulative impacts on traffic of the various new developments emerging in this area, cumulative harm, unclear what solution is to address significant issue, SCC should consider the cumulative impact of new development on the road network and to work closely with planners to build appropriate provision into the local plan. All developers should be required to contribute to a fund (via s106) which will enable the necessary strategic highway solutions to come forward.

Claydon and Whitton Parish Council

Object due to impact on village of Claydon, as no facilities for development in walking distance, future residents would drive to Claydon; Bring extra traffic to A14 junction; Development outside development boundaries.

Environment Agency

No objections - all development within Flood Zone 1, even with a climate change allowance of 65%. Access and egress routes travels through Flood Zone 1 and therefore proposed development does have a safe access route. The 0.1% climate change event has not been modelled, it is not known whether any properties would be at risk in this event, but provided properties have a first floor there would be safe refuge in this event as required. Sequential and exception test not required as site in Flood Zone 1 with a low probability of flooding, with less than a 1 in 1000 annual probability of river flooding; Although site is within flood zone 3a, proposed development sequentially sited in flood zone 1.

Anglian Water

Assets owned on site, informative note recommended. Capacity for wastewater treatment at Ipswich Cliff Quay Raeburn Water Recycling Centre, used water network/foul sewerage capacity in network provided flows go into gravity discharge regime to manhole 0101. If a pumped solution is required further consultation with AW needed; condition for drainage strategy, surface water to be determined by LLFA.

Highways England

No objections

NHS England

Two main practices within 3km - Deben Road Surgery and The Chesterfield Drive Practice (in branch of Landseer Road Surgery). Not sufficient capacity with this and known growth. Community Infrastructure Levy (CIL) sought to increase capacity within the GP catchment area, but amount not yet known. Intention of NHS England to promote Primary Healthcare Hubs. No objections, will be seeking CIL to meet required extension, refurbishment or reconfiguration of above surgeries.

Natural England

New development within the 13km zone of influence for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar sites is likely to have a significant effect. Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) contribution will mitigate this; Registered common land – if planning permission granted consent from the Secretary of State needed under Commons Act 2006; Standing Advice for protected species; Local sites and biodiversity and landscape enhancement should be considered.

Suffolk Wildlife Trust

1st response: Object - Insufficient info on Great Crested Newts (GCNs), otter, water vole and reptiles. Semi-improved grassland to north suitable habitat for protected species. County Wildlife Site (CWS) River Gipping - no assessment of impact on otter and water vole populations.

2nd response: No objections

Cadent Gas Network

Apparatus in vicinity affected by proposed development, required to contact Cadent if carrying out work.

National Grid

No objections to proposed development which is in close proximity to a High Voltage Transmission Overhead Line.

EDF

Request consultation with them to install meters.

Suffolk County Council (SCC) Highways

Comments made as follows: underestimated trip rates; reliance on private car use – particularly secondary school drop-off; links to adjacent land - third party consent required, cannot be certain it will be delivered; additional access required for more than 150 dwellings; junction geometries needed; Appendix J missing from Transport Assessment, The Street junction modelling info not provided; B1113/Lower St Burstall - staggered not crossroad.

2nd response: Cumulative impact of surrounding development on B1113/Burstall Road/ Lower Street and A1071/Swan Hill/High Street.

3rd response: Cumulative impact of surrounding development on road network within Bramford, Sproughton and Claydon including the following junctions: Station Road/Norwich Road Claydon, Church Road/Ipswich Road Claydon, Loraine Way/Lower Street/Burstall Road Sproughton.

4th response: No objection providing the following conditions and S106 requirements are secured. Highways consider that appropriate visibility splays can be met, whilst there is an increase in queuing and delays for all users at key junctions the cumulative approach to address highways issues will mitigate against the significant impacts. The site has connectivity with bus stops on The Street within 0.2 miles of the centre of the site and is within walking distance and the footway network for cyclists and pedestrians, the catchments primary school is 0.9 miles away with continuous footway links, the high school is 2.2 miles from the site with no continuous links. The Travel Plan requires further work. Requested conditions include provision of visibility splays, details of works required to provide access, details of roads and footpaths, construction of roads and footways to binder course level prior to occupation, provision of emergency access and pedestrian and cycle access prior to first use, a construction traffic management plan, surface water disposal from highways, details of parking and turning areas, refuse and recycling bin details. A Travel Plan and Public Rights of Way improvements (£21,750) to upgrade, resurface and widen approximately 340m of footpath FP11 in Bramford, and a total of £184,610 to secure highway improvements to address the wider cumulative impact as detailed in the committee report. Either a Section 278 agreement with SCC or CIL monies totalling £15,000 will also be sought to improve bus stops to make them more accessible for wheelchairs/pushchairs and install bus shelters.

SCC Travel Planning

Response provided in SCC Highways response above.

SCC Strategic Development

1st response: Secondary school plan contribution of £781,774 sought through CIL. Primary school construction £821,450 and build £60,027 sought through S106. New Primary school sought, but contribution may go towards expanding Bramford CEVC Primary School to two form entry, feasibility work ongoing. Place space needs to be adequately provided. Transport response separate to this response. Pre-school place deficit in Bramford and Blakenham - require £421,682. Libraries require £48,600 CIL contribution. Waste - ensure provision of bins prior to occupation by planning condition. Rainwater harvesting. Supported housing required. Sustainable Urban Drainage Systems (SUDS) - see SCC Flood advice. Fire Service - hydrants by condition, access for vehicles and provision of water needs to be ensured. Superfast Broadband - full fibre provision should be made.

2nd response: The requirements for education contributions have changed to Primary expansion of Bramford Primary School for which a CIL contribution of £1,181,694 will be sought; Secondary - provision of secondary, sixth form and further education places - CIL (amount to agreed); Pre-school place deficit in Bramford and Blakenham - require £297,500 through Section 106 agreement & 915sq.m. of land to be provided at either this site or potential development site on Fitzgerald Road; Highways, Archaeology and Flood responded separately; Libraries - £42,120 CIL contribution; Waste - ensure provision of bins prior

to occupation by planning condition. Rainwater harvesting; Waste £21,450 CIL contribution to new Household Waste and Recycling Site; Supported housing required; Fire Service - hydrants by condition, access for vehicles and provision of water needs to be ensured; Superfast Broadband - full fibre provision should be made.

SCC Flood

1st response: Objection - insufficient information on surface water disposal, hierarchy of infiltration first not demonstrated. Site in Groundwater Source Protection Zone (outer zone, Zone 2). 1. Infiltration test required - is this viable; 2. Evidence of discussion with East Suffolk Internal Drainage Board to discharge into River Gipping; 3. Indicative surface water drainage strategy plan either infiltration or attenuation and discharge to water course system; 4. Outline hydraulic calculation required.

2nd response: Maintain objection. Infiltration still not demonstrated, and outline hydraulic calculations required.

3rd response: No objections subject to conditions.

4th response: See previous comments, raise no objection. Note given the reduction in numbers would like to see open SUDS where possible at reserved matters stage.

Water Management Alliance

Advised liaison with Internal Drainage Board may be required.

East Suffolk Internal Drainage Board

If infiltration drainage not possible, consent would be required for any surface water discharge into a watercourse managed by the Board. A Surface Water Development Contribution fee would be required. Foul water discharge into a watercourse managed by the Board would also require consent. A riparian owned/maintained watercourse is present on site, consent would be required under the Land Drainage Act 1991 if this watercourse was to be altered at all. It is recommended that any consents are sought prior to planning consent being granted.

SCC Archaeology Service

1st response: Objection. Crop marks, Bronze Age and Medieval finds. Potential for paleoenvironmental and waterlogged deposits. Archaeological evaluation prior to determination of application. Trial trench needed.

2nd response: Objection - proposal does not allow for preservation in situ of important prehistoric burial monument.

SCC Fire and Rescue

Fire hydrants required to be secured through condition. Advice in flood areas. Must meet building regulations and consultation with water authority for flow rates.

Place Services – Landscape

1st response: Photographic viewpoint photographs from Landscape Visual Impact Assessment (LVIA) not submitted or the Zone of Visual Influence; Northern parcel of dwellings - remove as isolated; Landscape strategy adequate but in due course this needs to include SUDS types and locations, hard landscaping specification, play strategy and equipment specification; Landscape planting plan, landscape maintenance plan and specification need to be submitted as part of reserved matters – with a 3yr minimum maintenance plan. SUDS features should be included in management plan and adoption in place prior to construction. Boundary treatment plan and specification condition; Further information on mitigation measures - Road users on Loraine Way and PROW along River Gipping key views affected;

Landscape Rolling Valley Farmland landscape character - considerable landscape visual impact; Western edge characterised by sloping valley sides divided into small and medium sized fields and by homes widespread views from elevated areas; Eastern boundary - Valley Meadowlands - flat river valley floor with floodplains and valuable ecological buffer. Include in proposals existing hedgerows and trees, suitable native trees and appropriate settlement layout pattern. Local Nature Reserve - Bramford Meadows, adjacent to Gipping Valley Special Landscape Area. Bramford Village Design Statement - built form should be in harmony and typical of Suffolk village, and not a suburb of Ipswich; Visual amenity preserved and landscape and distinctiveness of Bramford not compromised; Use of existing built features and materials, native species; Mitigation - opportunities to create small woodland parcels, hedgerow planting along site boundaries, visual impact mitigation and green infrastructure opportunities; Opportunities in SUDS areas to create appropriate aquatic and wetland planting;

2nd response: Concerns that the proposals will lead to a substantial and adverse effect from some of the viewpoints within the LVIA, and further mitigation needs to be provided to address this. It would be useful for the Zone of Visual Influence to be included as part of the study.

Place Services – Ecology

1st response: Objection – Habitats Regulations Assessment required, RAMS needed to mitigate impact on Stour and Orwell Estuaries SPA/RAMSAR. European protected species either recorded or likely to be present due to habitat types - newts, otter, bats; UK Protected Species – reptiles; Priority species - house sparrows, swifts, common toad, smooth news, hedgehogs and priority bird species require mitigation and enhancement. Need to confirm the revised report is completed by suitably qualified individual.

2nd response: No objection subject to securing HRA for Stour and Orwell Estuaries SPA/Ramsar sites and biodiversity mitigation and enhancement measures. Condition to secure Construction Environmental Management Plan, Landscape Environmental Management Plan, Biodiversity Enhancement Strategy and Wildlife Friendly Lighting Design Strategy.

Babergh and Mid Suffolk District Councils (BMSDCs) Policy

Site on outskirts of Ipswich but spatially disjointed from existing settlement of Bramford. Further consideration of highway impact (cumulative), accessibility and connectivity of site, flood risk, mineral safeguarding, ecology, landscape impact, heritage impact to listed buildings require further consideration.

BMSDCs Infrastructure

High CIL Charging area.

BMSDCs Strategic Housing

1st response: No objections. 79 dwellings equates to 35% affordable. 59 affordable rented and 20 shared ownership. Can be determined at reserved matters stage with schedule of units; required to be built to space standards; 100% nomination rights on initial lets and 75% after; shared ownership - upper limit, initial purchase 70%; location and phasing agreed with Council; adequate parking; no more than 15 per cluster; not supported by HCA grant.

2nd response: Request housing mix as specified in response in S106 agreement.

BMSDCs Heritage

1st response: Minimal harm to assets - nearby listed building Rutters Farmhouse - need to balance benefit against harms. Open farmland to west and south, junction to east affects setting leading to minimal heritage setting impact.

2nd response: Very low harm to a designated heritage asset because its impact on the setting of the nearby listed farmhouse would be very low. If this and other harm are considered to be outweighed by benefits, steps should be taken to minimise impact by means of landscaping.

BMSDCs Waste Officer

1st response: No objection subject to condition - scale plans required to show Refuse Collection Vehicles (RCV) can access site. Wheeled bin presentation points and bin stores for two flat developments should be shown on plans.

2nd response: No objections subject to conditions. Wheeled bin presentation points for the private drive/secondary streets need to be presented at curtilage on internal spine roads as these are not suitable for a Refuse Collection Vehicle. Alternatively increase the secondary streets to the same as the internal spine road specification so that the bins can be collected from the property curtilage. Provide a map including the wheeled bin presentation point so these can be checked and approved, including for proposed flats on site.

BMSDCs Environmental Health

No objections but request construction hours of 8am-6pm Mon to Fri, 8am-1pm Sat and no work on Sundays or Bank Holidays. If any plant or machinery required on pre-school facility condition required to consider noise.

BMSDCs Environmental Health Sustainability

1st response: Refusal - condition required to minimise environmental impact during construction and occupation.

2nd response: Previous comments still apply, if pre-school over 1000sq.m. condition for renewable energy provision required.

BMSDCs Environmental Health Contamination

Phase 1 report on contaminated land submitted, condition required.

B: Representations

16 letters of objection, 1 letter of support and 2 letter of comment. Summaries provided below. Comments in support including:

- Bramford Parish Council preferred site over land to South of Fitzgerald Road in recent local plan consultation, but need to consider impact on highway capacity. To address this consider;
 - o Safe and lit footpath and cycleway to village centre
 - o Restoration of Bury Road Park and Ride service to Ipswich
 - o Enhancement of bus service 89 to hourly daytime and evening service
 - o Stop traffic from entering village centre from B1113 Loraine Way via Fitzgerald Road and The Street, and Paper Mill Lane to access only.
 - o Traffic control measures at site entrance and 30mph speed limit
 - o 20mph limit and shared pedestrian zone in The Street between Gippingstone Road and Leggatt Drive
 - o Stricter traffic law enforcement

Comments objecting including:

- Already development in this area, no need and do not want village to join with Claydon

- Keep village intact by building and developing Papermill Lane and making them part of the village
- If building any further east will need to put footpaths and cycle lanes to ensure easy access
- Access point into site at distance from existing village, most future residents will access services and Ipswich via A14 and not travel through village.
- Detached from Ipswich and Bramford
- Suggest mini roundabout formed instead at junction with Somersham Road providing greater linkage to village. This would also reduce vehicle speeds along this road.
- A roundabout could be accommodated within application site and adjacent land.
- land levels will prevent village from being visible to residents leaving site in car.
- suggest cyclists and pedestrians encouraged to use the same access as cars, and the secondary access is made the primary access to encourage use of village shops/services and bus routes.
- Greenfield land used by wildlife and keeps air clean
- Impact on visual beauty of landscape and river valley
- Hedges and trees help air quality and mitigate impacts of strong winds
- Destruction of a rural location for un-needed houses
- Not sufficient infrastructure in place – schools, hospitals, doctors and dental surgeries and other public services
- Traffic impact and congestion with people commuting to shops, places of leisure and employment elsewhere (local employment limited), impact of pollution and noise detrimental to health
- Impact on rail network and additional passengers
- Impact on lives of local people, impact to dwellings along Loraine Way, loss of views from gardens and disturbance from new residents/cars
- Limited public transport
- Demand on water supplies
- Risk of flooding
- Prefer development on Brownfield site in village
- School capacity at Bramford Primary School and Claydon High School
- Benefit of bring more teaching jobs and other jobs such as refuse collectors
- Opportunity for affordable home ownership for residents and their children queried
- Area of Outstanding Natural Beauty, Gipping Valley Path natural surroundings, preserving historic setting of Stowmarket Navigation Towpath.
- Regard should be had to Bramford Parish Plan and Village Design Statement 2012
- Proposed housing would impact on picturesque rural setting of River Gipping, which would affect heritage asset
- Impact on protected species
- More detailed archaeological evaluation required given significance of archaeology in area
- Combined Transport Assessment and Travel Plan not publicly available on application and so cannot comment on it. Concern over impact on highway network in this and surrounding villages.
- Reduce speed limit to 20mph, flashing speed signs
- Weight limit enforced on B1113
- Improvements to B1113 for pedestrian, cyclist and vehicular traffic
- Suggests traffic lights at junction of Loraine Way and Somersham Road
- Suggest village entrance signs
- Impact of traffic on Sroughton
- Highway impact of additional development considering road is used instead of A14
- Impact of this and consented homes change village environment to urban surroundings, affecting community values.

- Development would impact on space used for community leisure activities such as walking, cycling, riding, swimming and water sports.
- Impact on healthcare as stated by NHS England
- Air, noise and light pollution
- Loss of open space
- Impact on highway network, schools
- Impact on value of house due to current unique location
- Site is registered common land
- Should dwellings be located so close to power lines?
- Provision of services such as water, electricity and gas would be costly and disruptive
- Do not agree to pre-school on site, will increase traffic and not safe location with river
- Footpath behind residents houses along Loraine Way adversely impact privacy

PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

- 1.1 The application site comprises Grade 3b and Grade 4 agricultural land on the northern fringe of Bramford, which is designated as a Key Service Centre in the Core Strategy. The site is within the Parish of Bramford.
- 1.2 Bramford contains a number of services and facilities including a local convenience shop and primary school, as well as good connectivity with a regular bus service from Ipswich to Stowmarket during the daytime on Mondays to Saturdays.
- 1.3 The site is bounded by Loraine Way (B1113) to the west which is a 40mph road, with 11 dwellings dating from the C20th forming mostly semi-detached properties along part of the west boundary of the site. To the north of the site is Bramford Common, Bramford Driving Range and Suffolk Water Park (formerly sand and gravel pits). To the east of the site is the River Gipping, which directly adjoins part of the eastern site boundary. To the south of the site is an open area which forms part of open space and surface water attenuation features relating to a new residential development being constructed by Hopkins Homes (under outline consent 2986/15 and reserved matters 0156/17, subsequently referred to a 'Willowbrook' in this report) and also community playing fields adjacent to the River Gipping.
- 1.4 There is also an underground gas pipe across the site from the east to the south west corner of the site. Directly to the south west of the site is gas apparatus enclosed by metal railings. Also notably there are high-voltage 400kV overhead power cables that run east to west across the site with two towers/pylons on the site.
- 1.5 There is some landscaping around the west and north boundaries. There are hedges and trees running within the site near the east boundary. To the south of the site is a drainage ditch and some landscaping.
- 1.6 There is a listed building within the vicinity of the site, Grade II Rutters Farmhouse. This building is located on Somersham Road, near the junction with Loraine Way to the south west of the site. There is also the Grade I listed St Mary the Virgin Church to the south of Bramford on Vicarage Lane at some distance from the application site. There are also other heritage assets outside of the site in the

vicinity including a Roman Road to the north west of the site and a World War Two pillbox to the south west of the site.

- 1.7 The site directly adjoins the River Gipping, and forms part of the side of the river valley. The site levels are higher near Loraine Way and to the south west of the site, with the site levels lower to the north of the site and adjacent to the river to the east of the site. The site is visible from public footpaths along the River Gipping Valley and can be seen from the Norwich-London trainline which is located some 500m further to the east beyond the river.
- 1.8 The site is not within an area of special character designation such as an Area of Outstanding Natural Beauty, but does directly adjoin a Special Landscape Area to the east of the site. The site is also within the Site of Special Scientific Interest (SSSI) Impact Risk Zone and the Mineral Consultation Area set by Suffolk County Council's Minerals Core Strategy 2008. The site is also within a Groundwater Source Protection Zone relating to groundwater as the site is located over a Principal Aquifer.
- 1.9 The site has been put forward for development under the Babergh and Mid Suffolk Joint Local Plan Consultation Document (August 2017). This identified the site (SS0478) as not being suitable for housing due to its physical detachment from Bramford, but did note the above planning consent 2986/15 as a consideration which would in effect lead to the site adjoining the existing settlement pattern.
- 1.10 The site measures 13 ha and is located in Flood Zones 1, 2 and 3a. Part of the application site is a registered common, to the north of the site. There are public rights of way along the east bank of the River Gipping, outside of the application site (footpath W-155/025/0) and to the south of the application site (footpath W-155/026/A), to the north of the Willowbrook development being built.
- 1.11 Bramford Meadows Local Nature Reserve and County Wildlife Site is located approximately 250m to the south east of the site adjoining the River Gipping.

2. The Proposal

2.1. The application is an outline application for 195 dwellings with access, but all other matters reserved. The proposals include:

- affordable housing
- landscaping and public open space
- pedestrian, cyclist and emergency access onto Loraine Way
- pedestrian and cyclist access to land to the south of the application site (Willowbrook development site)
- location for potential pre-school

2.2 All other matters except access including layout, scale, appearance and landscaping are reserved for further consideration at reserved matters stage should this be granted approval. The proposals include indicative plans to demonstrate how the development could be accommodated on site:

2.3 The resultant scheme would have a gross density of 15 dwellings per hectare, when including the proposed open space in the calculation.

2.4 The application has been amended significantly since submitted, reducing the number of dwellings from 230 to 195 to address the landscape impact of the proposals. A revised illustrative masterplan has also been submitted to demonstrate a pre-school could be provided on the site if needed, how areas of archaeological interest can be protected on site and how the previously identified landscape harms can be addressed.

2.5 The following information has been submitted to support the proposals:

- Design and Access Statement
- Planning Statement
- Landscape Character and Visual Assessment, later also a Landscape Visual Impact Assessment
- Landscape Masterplan
- Transport Assessment
- Flood Risk Assessment
- Utilities Report
- Statement of Community Involvement
- Heritage Statement
- Ecology Assessment and Habitats Regulations Assessment
- Geophysical Survey
- Drainage Strategy
- Archaeological Desk Based Assessment
- Site Location Plan, Parameter Plan, Illustrative Masterplan
- Tree Survey
- Site Delivery Plan (Delivery Statement)

2.6 To support the amendments to the proposals the following information was submitted for consideration:

- Illustrative Masterplan
- Parameter Plan
- Design and Access Statement
- Arboricultural Impact Assessment and Tree Survey
- Addendum to Technical Reports
- Landscape Character and Visual Impact Assessment
- Protected Species Addendum
- Site Delivery Statement

3. The Principle Of Development

3.1 The starting point for any planning decision is the development plan, as identified in Section 38(6) of the Planning and Compulsory Purchase Act 2004. Determination of any application must be made in accordance with the plan unless material considerations indicate otherwise. A key material consideration regarding the principle of development is the National Planning Policy Framework (NPPF) 2019.

3.2 This application site is outside of the settlement boundary for Bramford, although the site of Willowbrook currently being developed brings the built form of Bramford closer to this application site. The site is greenfield land as it is in agricultural use. Relevant local plan policies are policy H7 which seeks to restrict housing development unrelated to the needs of the countryside, and core strategy policy CS1 which identifies a settlement hierarchy and CS2 which also seeks to resist development in the countryside other than those listed in the policy. The NPPF has changed direction since these policies were adopted as detailed further below, so as to affect the weight of these policies in determining this application.

3.3 The Core Strategy Focused Review (2012) identified this change in line with the National Planning Policy Framework. Reflecting this policies FC1 – Presumption in favour of sustainable development and

FC1.1 – Mid Suffolk approach to delivering sustainable development identify a more positive approach to proposed development.

3.4 It should be noted however that policy FC2 – Provision and distribution of housing seeks to identify the number of dwellings in Key Service Centres that should come forward on greenfield sites, 100 between 2017 to 2022 and 200 from 2022 to 2027.

3.5 The NPPF identifies in paragraph 213 that the weight attributed to policies should be according to their degree of consistency with the NPPF. The closer the aims of the policy are to the NPPF the greater the weight that can be attributed to them.

3.6 The NPPF also identifies that planning decisions should apply the presumption in favour of sustainable development (paragraph 11):

“For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

3.7 Footnote 7 of the NPPF identifies out-of-date includes the situation where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was less than 75% of the housing requirement over the previous three years. In this instance the Council cannot current evidence a sufficient land supply and so policies most important for determining the application are out-of-date. The Council is currently consulting on a Draft MSDC Housing Land Supply Position Statement 2018/2019. This identifies a housing land supply position of 5.32 years (with a 20% buffer), but given its draft status is given no weight in this recommendation.

3.8 The policies most important for determining the application are policy H7 of the local plan, CS1 and CS2 of the Core Strategy and FC2 of the Core Strategy Focused Review. These are considered to be out-of-date as a result of the five year land supply position, however notwithstanding this are not consistent with the aims of the NPPF and therefore accorded less weight. This position was identified in the appeal decision for appeal APP/W3520/W/18/3194926 at land at east side of Green Road, Woolpit which is a material consideration. Policy FC1 of the Core Strategy Focused Review repeated the requirements of the former paragraph 14 of the NPPF (2012), which is replaced now with paragraph 11 (NPPF 2019) which is the more relevant consideration, and so this policy is given less weight. Policy FC1.1 seeking to conserve and enhance the local character of different parts of the district, is up-to-date and relevant to this application. These two policies seek to promote the principles of sustainable development.

3.9 The presumption in favour of sustainable development should apply in this instance given the above considerations, except for the provisions of paragraph 177 of the NPPF.

3.10 The site is subject to a Habitats Regulations Assessment (Appropriate Assessment). Paragraph 177 of the NPPF identifies that if development requires appropriate assessment because of its potential impact on a habitats site the presumption in favour of sustainable development cannot apply. It should be noted that there are not considered to be likely significant effects from this development, as outlined further in the ecology section to this report, and so the presumption in favour of sustainable development does apply to the proposed development.

3.11 Also it cannot be ignored that the policies most important for determining the application do not accord with the NPPF. Therefore less weight will still be given to these policies as identified above. Whilst tension with the development plan exists and is noted, that tension is considered to be less significant as a consequence, in light of the lesser weight afforded to the most important development plan policies relevant to this application where they are not consistent with the NPPF.

3.12 Therefore an assessment against the development plan is made, considering the material consideration of the NPPF and the purpose of the planning system to contribute to the achievement of sustainable development.

3.13 The development plan and NPPF share the same approach of contributing to the achievement of sustainable development.

3.14 There are three overarching objectives to achieve sustainable development, which are interdependent and need to be pursued as a whole so that opportunities can be taken to secure net gains across different objectives. These objectives are social, environmental and economic. The merits of the scheme against these objectives and the up-to-date requirements of the development plan are considered below, and a conclusion will be drawn as to whether the development is considered to contribute to the achievement of sustainable development.

4. Nearby Services and Connections Assessment Of Proposal

4.1. As noted in the introduction to this report, the site is located to the north of the settlement boundary of Bramford. The site itself does not directly adjoin the existing settlement boundary, and is 300m from this boundary. However, since the current settlement boundary was set a further development has been permitted on the edge of Bramford. This consented development, Willowbrook, is in the process of being constructed by Hopkins Homes. This is a significant factor when considering the locations and connections of the proposed development to the existing village of Bramford.

4.2 There are two key matters to note from the Willowbrook development site. The development at Willowbrook would not be as far north as the boundary of this application site, with an intervening area of open space in between the two sites. This in part is being used as open space relating to the Willowbrook development but also for a surface water attenuation feature.

4.3 The second matter to note is that evidence has been provided in the form of a Transfer Agreement between Hopkins Homes and Cemex, where an access road with footways through the Willowbrook site, that is capable of being delivered to adoptable standards must be provided up to the boundary of this application site. This is sufficient evidence to demonstrate that pedestrian and cycle paths could be secured to connect this application site to the Willowbrook development site. A condition is recommended however to ensure a pedestrian/cycle way is secured on the neighbouring application site to ensure this site is connected to the wider pedestrian network. It is considered reasonable in this instance in light of the Transfer Agreement that is in place with the landowners and Hopkins Homes. It should be noted however that the footpath and cycle path link provided to the south west of the site is considered sufficient to provide adequate accessibility to Bramford village on foot or by cycle, and if for any reason the above footpath/cycle path with Willowbrook does not come forward the accessibility of the scheme is still considered to be acceptable.

4.4 The application site also provides a pedestrian/cyclist access from the south west corner of the site onto Loraine Way, which connects to a continuous footpath into the village. Pedestrians and cyclists can walk and cycle into the village centre or to bus stops. There are regular buses to Stowmarket and

Ipswich, local secondary school in Claydon, supermarkets, Ipswich bus station and other retail and employment destinations in Ipswich, from the village with regular daytime services Mondays to Saturdays, with the closest bus stop located around 200m from the pedestrian access on to Loraine Way.

4.5 The site is also in close proximity to Ipswich, with National Cycle Route 48 passing through The Street, Bramford and which goes on to join Route 51 connecting the village to Ipswich. The site is 6km from Ipswich rail station, with bus routes into Ipswich to the station and the potential for residents to cycle this provides further sustainable transport links. Lastly, the site is in close proximity to junction 52 of the A14 providing quick access to this transport corridor.

4.6 Whilst there are a certain number of services in the village such as convenience shops, primary school and restaurants/public house, and a Travel Plan will be promoted to future residents to encourage sustainable transport modes, it must be recognised that future residents of this development would still be likely to use private car to travel for the purposes of employment and leisure uses.

4.7 The close proximity of Bramford to Ipswich however should be noted, with Bramford being considered a sustainable location for this proposed development in terms of accessibility. New housing in this location would help to contribute to growth in the local and wider economy. Bramford is recognised as a Key Service Centre that has a range of local services and facilities which also provide employment opportunities for local residents.

4.8 The site is therefore considered to be relatively well connected and a sustainable location for this further development and is considered to promote inclusive communities as required by paragraph 91 of the NPPF.

Doctor's surgery capacity

4.9 The NHS were consulted on and responded to this planning application and identified there were two branch surgeries within 2km but there was not sufficient capacity at either for this additional development. However it was considered that subject to requesting Community Infrastructure Levy (CIL) monies the existing surgeries Deben Road Surgery and Chesterfield Drive Practice (including the branch Landseer Road Surgery) could be extended, refurbished or reconfigured to provide the required healthcare facilities for this additional growth.

School capacity

4.10 The capacity of schools in the local area has been assessed in terms of the need arising from existing residents, this development and committed developments in the school's catchments areas.

4.11 The requirements for education provision have been considered through this application process. The requirement for this development would be for a CIL contribution of £1,181,694 to enable the expansion of Bramford Primary School. CIL would also be sought for secondary, sixth form and further education places, with an amount to be agreed at a later date.

4.12 There is an identified deficit of pre-school places in Bramford. To address this the County Council have identified both a contribution of £297,500 to be secured through a Section 106 agreement, but also potentially land to be secured on this site. At present the County Council have identified that either land at this application or the potential development site on Fitzgerald Road in Sproughton could deliver this pre-school. There is currently no certainty that the land at Fitzgerald Road could provide a pre-school site as no planning permission has been granted and it is not certain that development will be approved on this site. A pre-school has therefore been identified on this application site and can be secured in the

S106 agreement should it be required, but will fall away if the pre-school is provided elsewhere. This builds in flexibility as to where the pre-school could be located, whilst ensuring it will be delivered.

4.13 With regard to the location of a pre-school at this site, the site is located outside of existing settlement boundaries. However, the site is accessible on foot and with the proposed development would be connected to the existing built form. The principle of a school site in this location is therefore considered acceptable under policy SC8 of the local plan.

4.14 The provision of other infrastructure is considered further in section 11 of this report below on Planning Obligations and CIL.

5. Site Access, Parking And Highway Safety Considerations

5.1. The proposed development of 195 dwellings has been considered in terms of impact on the wider road network through the Transport Assessment submitted with the application. The site access via Loraine Way and connections to the wider road network have been considered for road capacity and highway safety, as required by local plan policy T10 and paragraph 109 of the NPPF. Paragraph 109 of the NPPF identifies that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 111 of the NPPF also seeks Travel Plans for development that generate significant amounts of movements. The local plan policy is considered to align with the NPPF, although the NPPF provides a higher test as to when development can be refused on highways grounds. Local plan policy T10 is therefore given less weight in the context to cumulative highway impact.

Impact on wider network

5.2 The Transport Assessment submitted with the planning application assessed the likely impact of vehicular traffic associated with the proposed development. Traffic modelling was undertaken to consider the impact of this development and trip generation on key local junctions using recent traffic survey data. Both the individual and cumulative impacts of this development with other surrounding planning applications has been considered. These applications included the following applications and sites:

- 18/02010 and 18/02412 at land east of Bramford Road, Sproughton (54 dwellings)
- Potential development site at land north of Burstall Lane, Sproughton (now planning application 19/0567 for 114 dwellings)
- B/15/00993 at land north and south of Poplar Lane, Sproughton (620 dwellings, employment and commercial uses and other associated infrastructure)
- Potential development site at land south of Fitzgerald Road, Bramford

5.3 The Highway Authority carried out analysis of the applications Transport Assessments/Statements for the above planning applications. This identified the potential for cumulative highway impacts from all potential development sites coming forward, in particular there are significant/potentially severe delays at key junctions of Loraine Way/Lower Street/Burstall Road in Sproughton. Subsequent discussions were held with the developers of the above sites to consider how the identified cumulative highway impacts could be mitigated.

5.4 A series of improvements have been identified by the Highway Authority for all of the above schemes to contribute proportionally to, to address the cumulative highway impacts. These will be secured via Section 106 contributions from each developer. These include:

- A1071/B1113 Beagle Roundabout – junction improvements to widen approach lanes to roundabout
- New zebra crossing on B1113 to the north of Wild Man Public House

- B1113/Burstall Lane – reduce kerb radii and install uncontrolled pedestrian crossing
- New cycle link between Sproughton and Bramford – cycle link on Loraine Way/footway improvements

5.5 The above improvements require all developments to come forward to enable the full cost of the works to be secured. It has been considered what would happen if one scheme were to stall or to not come forward. In this instance some improvements could still be carried out for example on the Beagle Roundabout. In this instance the roundabout widening would be delivered by the first development, and signals/widening delivered by later sites. If insufficient funds were secured to deliver the zebra crossing or uncontrolled pedestrian crossing on the B1113, the funds that have been collected from commenced developments would be put towards delivering the new cycle link between Sproughton and Bramford. This is considered to adequately mitigate the highway impact for this proposed scheme.

5.6 Members may also wish to note within the vicinity of this application site the following improvements would be secured if the following planning applications were granted permission and constructed. These improvements listed below are required to mitigate the direct impacts of the planning consents below, and so it is not reasonable to require this application currently being considered by Members to contribute to these. The improvements to be secured through planning condition are:

Duplicate planning application 18/02010 and 18/02412 on land east of Bramford Way, Sproughton:

- B1113/Access to site – new priority junction with right hand turning land

Planning application 19/00567 at land north of Burstall Lane, Sproughton:

- B1113/Access to site – new priority junction with right hand turning land
- Burstall Lane – removing link to Bramford Road, creating a pedestrian area/prohibition of motor vehicles except access

5.8 These above three improvements to the B1113 and Burstall Lane would also enable land to be safeguarded for a potential roundabout at the entrance to the above two planning applications.

5.9 Through the work to consider the cumulative impact of proposed development in the vicinity of this application site, two application sites in Barham and Claydon were also considered. These were 18/00861 for 73 dwellings on land at Ely Road in Barham and Claydon, and land east of Norwich Road in Barham for 269 dwellings. These were considered but there was not considered to be a cumulative impact with this application site currently being considered by Members as they are too geographically detached, most notably by the A14, for traffic from those developments to impact roads and junctions around this application site.

5.10 Along with the above junctions, the following junctions have been considered for impact of the proposed development:

- site access
- B1113 Bramford Road/B113 Bramford Road (north) – signalised junction
- B1113 Loraine Way/B1067 The Street – priority junction
- A1071/Hadleigh Road (Beagle Roundabout)

5.11 All junctions are identified within the submitted TA to operate within capacity with the proposed growth, but there are two junctions that would near capacity. These are the B1113/Lower Street/Burstall Lane junction in Sproughton and the A1071/Hadleigh Road junctions. The B1113/Burstall Lane junction would near capacity in the AM rush hour with all additional planned growth within the surrounding area. It should be noted however that this proposed development would have a minimal impact on the junction, but in cumulation the junction is nearing capacity.

5.12 The junction of the A1071 and Hadleigh Road would also be nearing capacity, but there would be minimal additional delay compared to the existing situation and so it is not considered there would be an unacceptable highway impact. The improvements to this junction required under application B/15/00993 (land north and south of Poplar Lane) have been taken into account when making this assessment. Appropriate highway mitigation measures are identified above to sufficiently address this network capacity issue. Whilst the applicant identifies their scheme would only have a minimal impact, they do have an impact in conjunction with existing road capacity and proposed developments in the area. It is therefore considered reasonable to secure the above mitigation measures. With these two junctions and the identified mitigation measures the highway impact would only be approaching capacity and not a severe adverse highway impact, as is the test under paragraph 109 of the NPPF.

5.13 Highways England have been consulted and raised no objection in terms of the impact on the trunk road A14 and its junctions near to Bramford.

On site access and other highways matters

5.14 The application seeks detailed consent for the access point on Loraine Way, to the north of the existing dwellings on the east side of Loraine Way. The proposed junctions has been designed to an acceptable level with appropriate visibility splays. The precise layout, design and specification of roads within the development would be determined at the reserved matters stage, and secured through condition.

5.15 Whilst the development is only at outline stage, it is important to ensure an adequate amount of parking can be provided on site for the proposed number of dwellings in line with policy T9 of the local plan and the adopted Suffolk Parking Standards 2014. This development plan policy is given full weight as it is considered to align with paragraphs 105 and 106 of the NPPF in providing minimum parking space standards unless compelling reasons justify otherwise. The indicative site layout plan shows parking and garage spaces can be provided for each dwelling. The final layout and provision would be agreed through reserved matters, and there is considered to be sufficient space to be able to secure parking to the required standards through planning condition, and in accordance with policy T9 of the local plan.

5.16 Sufficient cycle parking for two cycles per dwelling plus visitor cycle parking could be provided within garages of houses/bungalows or through covered and secure storage units in rear gardens of flats. This would be secured at the reserved matters stage. Also refuse bins could be stored in rear gardens, with refuse storage and collection areas being designed into the reserved matters. A condition would be used to secure these to an appropriate design and location.

5.17 The Highway Authority have raised no objections subject to the mitigation measures and details to be secured through the S106 and proposed conditions below. They identify that the Travel Plan requires further work, but this can be secured through legal agreement. Also monies totalling £15,000 will be sought to improve bus stops to make them more accessible for wheelchairs/pushchairs and install bus shelters. With the proposed mitigation through S106 agreement and proposed conditions, the proposed development is considered to meet the requirements of both paragraphs 109 and 111 of the NPPF and policy T10 of the local plan ensuring there is not a severe impact on the road network, provision of safe access and egress from the site, the safe and free flow of traffic and pedestrian safety, suitable capacity in the road network, adequate parking and turning for cars and service vehicles and pedestrian and cycle links.

6. Landscape Impact, Trees, Ecology, Biodiversity And Protected Species

Landscape

6.1 The site is located adjacent to the River Gipping, and is within the landscape character areas of both Rolling Valley Farmlands and Valley Meadowlands adjacent to the river. The site forms part of the valley side to the River Gipping, with the land level falling from approximately 16m AOD to the west of the site to approximately 7 AOD to the east of the site. The river valley is within a Special Landscape Area under policy CL2 of the local plan, but the application site is not within this area at all.

6.2 The site as described above is relatively open within the site currently in agricultural use, but is bounded by mature vegetation along the west and north boundaries. The south and east boundaries have less landscaping, particularly the east boundary of the site which is open to the river. There are some intermittent trees and hedges to the east of the site running north to south. The site is also traversed by large electricity pylons. Whilst there are no formal public footpaths within the site there are well established informal footpaths running along the eastern boundary to the registered common, Bramford Common to the north of the site.

6.3 Core Strategy policy CS5 seeks to protect and conserve landscape qualities and encourage development that is consistent with the overall character of the area. Whilst the site is not located within a Special Landscape Area (SLA), it is directly adjacent to one. Policy CL2 of the local plan seeks that where development is proposed within SLAs there should be particular care to safeguard landscape quality, and where development does occur it should be sensitively designed with high standards of layout, materials and landscaping. These policies are considered to align with paragraph 170 of the NPPF which seeks to protect and enhance valued landscapes and recognises the intrinsic character and beauty of the countryside, and so can be given full weight. Regard is also had to the content of the Bramford Parish Plan and Village Design Statement 2012 in considering the landscape impact of this development.

6.4 The Joint Babergh and Mid Suffolk District Councils Landscape Guidance 2015 provides further guidance to the key characteristics of the above landscape character areas (LCAs) and key design principles when considering development.

6.5 For Rolling Valley Farmlands the key characteristics are sloping valley sides with easily worked soils that have been divided into small and medium sized fields, and from elevated locations within this landscape character substantial views are obtained. The area is considered to have a wide zone of visual impact. The key objective for this landscape character area is to maintain and enhance the distinctive landscape and settlement pattern.

6.6 For the character area of Meadowlands the key characteristics of the sense of tranquillity of this landscape being affected by development of the adjacent Rolling Valley Farmlands, providing a valuable service as floodplain and a valuable ecological environment. The key design principles for this area are to ensure appropriate mitigation strategies to minimise the detrimental impact of any development, natural drainage systems of ditches to be retained and restored, taking into account the cultural and history importance of the area and impact on the functional floodplains and ecology of the area, and retains the scenic and tranquil quality of the area.

6.7 There have been amendments to the scheme to address the landscape impact from the original proposals. Originally 225 dwellings were proposed but following discussions this was reduced to 195 dwellings, removing the proposed development to the north of the pylons on site.

6.8 It is important to note that the application site does not represent a large part of either landscape character. Whilst the site is quite large at 13ha it has a limited number of visual receptor points where the site is visible to the wider area. The key visual receptors identified in the LVIA are identified as:

- Residents of properties east of Loraine Way
- Residents of no. 6-7 The Street
- Residents of properties west of Loraine Way
- Residents of Rutters Farmhouse
- Visitors to Suffolk Water Park
- Users of Loraine Way
- Walkers on footpath 1 to south of site (footpath W-155/026/A)
- Walkers on Gipping Valley River Path between Suffolk Water Park and Bramford Bowls Club
- Walkers on Gipping Valley River Path beyond Suffolk Water Park and Bramford Bowls Club

6.9 Of these visual receptors, walkers on footpath 1 and on the Gipping Valley River Path between Suffolk Water Park and Bramford Bowls Club would have substantial and adverse effects on visual amenity within year 1 post construction of the development. However, with the proposed landscaping mitigation this harm reduces to moderate and neutral by year 15. Whilst there may be some harm in the intervening years the residual effects at year 15 are an important factor in considering the acceptability of the scheme within the lifetime of the development. All other visual receptors would have moderate and adverse impacts by year 1, reducing to minor and adverse or minor and neutral by year 15.

6.10 The overall impact on the identified landscape character areas would be minor and adverse for the Gipping Valley SLA and the Rolling Valley Farmlands. The impact on Arable Farmland would be moderate and adverse as the character of the agricultural field would be irreversibly changed. The effect on the River Meadows LCA would be substantial and adverse by year 1, reducing to moderate and adverse by year 15.

6.11 The cumulative impact of adjacent consented developments has also been considered. The development at Willowbrook would lead to some cumulative effects on landscape character and visual amenity, but as this is only experienced from the walking routes the impact is reduced to not be significant in the wider consideration of landscape impact.

6.12 To address the above landscape impacts, and enable their mitigation planting is proposed along the east of the application site, strengthening the existing trees and hedge that form existing landscaping and screening.

6.13 The key impacts are therefore considered to be to walkers along part of the Gipping Valley River Path, the character of the arable farmland and the character of the river meadows. The impacts on landscape character are identified as moderate and adverse in the submitted LVIA, which does not lead to a substantial level of harm. The site is also considered to not make a significant contribution to the wider Arable Farmland landscape character. Whilst the River Meadows are identified as highly sensitive to this development, the opportunity to enhance the existing natural screening to the east of the site would lead to no long-term significant effects. The key impact on visual amenity is identified as a relatively short section (650m) of the wider Gipping Valley River Path and footpath to the south of the site.

6.14 The Council's Landscape Architect has reviewed the most recent proposals. They welcome the revisions to address their previous concerns, but stress the importance of advance planting prior to the commencement of construction to ensure that the substantial and adverse effect on views from footpath 1 and the Gipping Valley River path are mitigated to moderate and adverse. They also note that the revisions to the Landscape Character and Visual Impact Assessment includes a Zone of Visual Influence map and further design and landscape mitigation commentary that addresses the previous concerns and are deemed acceptable. The landscape strategy provided, along with details of green infrastructure and landscape character, is deemed acceptable as long as the landscape principles are carried forward as part of any future reserved matters application which would be secured via condition.

6.15 The amendments to the scheme have gone some way to reduce the landscape harm from the proposed development. There remains however moderate and adverse harm to the Arable Farmland and River Meadows landscape characters, and moderate and neutral impacts to users of the public footpath and river valley walk adjacent to the site even with landscaping for mitigation, leading to conflict with local plan policy CL2 seeking to safeguard landscape quality within SLAs and policy CS5 of the core strategy which seeks to protect and conserve landscape qualities. Whilst there are higher levels of harm during construction and by year 1 of the development, it is reasonable to consider the proposed landscaping as mitigation and the impact this will have within the lifetime of the development. These harms are considered in the wider balance in the conclusion of this report.

6.16 It is noted there is a registered common on the site. Bramford Common is located partly on the north of this application site. There is no development proposed on the land identified as the registered common. Under the proposed application it is identified to be enhanced as an area of public open space, offering benefits when considering the balance of the application.

Trees and hedges

6.17 Three trees are proposed to be removed from the site, but the majority of trees are to be retained. The inclusion of the pre-school facility will result in the loss of two category C sessile oaks and a category C hawthorn. Also to enable the access road and visibility splay to be provided a section of hedge facing onto Loraine Way would be removed. The category C trees are not the most valuable category of tree, and their loss would be adequately compensated through the replacement landscaping to be provided on site. The hedge to be lost forms part of a wider hedgerow along the boundary and is a category B hedge. Whilst the loss of this hedge is regrettable, it must be balanced against the proposed planting and habitat improvement on the wider site. The harm of the loss of this hedge must also be balanced against the benefits of the scheme of providing housing and affordable housing. The harm of loss of the section of hedge is therefore considered to be outweighed by the additional planting on the site and benefit of bringing forward new dwellings. Any approval issued would require a detailed Arboricultural Method Statement, Tree Protection Plan and monitoring schedule through conditions of the permission in order to help ensure the protective measures referred to are implemented effectively. The proposed development is therefore considered to preserve and protect the landscape qualities of this site with regard to trees and hedges, in accordance with policy CS5 of the core strategy.

Ecology, Biodiversity And Protected Species

6.18 Local plan policy CL8 seeks to protect rare or vulnerable species, especially those protected by law. Core strategy policy CS5 seeks to protect and enhance biodiversity, protected sites, wildlife corridors and ecological networks. These requirements are considered to be supported by the relevant paragraphs in the NPPF, including 170 on minimising impacts on and providing net gains for biodiversity, 175 which seeks to avoid, mitigate, or compensate for adverse impacts or lastly refusing harmful development, and looking for opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity. Therefore the above development policies are considered to carry full weight.

6.19 An Ecological Appraisal was submitted with the application which identified a number of habitats on site including arable land, semi-improved grassland, river and ditches, hedgerows, tall ruderal vegetation and trees. No significant plant species were recorded on the site. There were however habitats that could support protected species including:

- mature trees that could provide potential roosting opportunities
- hedgerows within the site that could provide foraging opportunities
- river edge could provide habitat for water voles and otters

- nesting birds in suitable habitat on site
- semi-improved grassland and ruderal vegetation could provide habitat for reptiles and amphibians

6.20 An assessment was also made of sites with statutory designations within the vicinity of the site. Bramford Meadows Local Nature Reserve is located 0.2km to the south east of the application site, Little Blakenham Pit Site of Special Scientific Interest (SSSI) 1.6km north west of the site, and the Stour and Orwell Estuaries Special Protection Area (SPA) and SSSI 6.7km to the south east of this site. Sites with non-statutory designation in the vicinity include the River Gipping County Wildlife Site.

6.21 This also identified the following mitigation and enhancement measures:

- retain existing hedge network and manage as part of open space provision on site
- improve species mix of existing hedges
- use SuDS areas to promote native species
- provision of log-piles hibernacula in vicinity of SuDS features for new opportunity for amphibians and reptiles
- improve the species mix of native plants in the meadow habitats, and maintain for water vole and otter use
- bat bricks/tiles incorporated into new buildings

6.22 On review of this information, further information was requested by the Council's Ecology Consultant to assist in the assessment of the impact of additional visitors from this proposed development to the Stour and Orwell Estuaries SPA and further information to assess the impacts of the proposals on Great Crested Newts, otters, bats, reptiles, house sparrows, swifts, common toads, smooth newts, hedgehogs and other priority bird species.

6.23 Further surveys were carried out by the applicants, which only identified the potential for Slow Worms on the site out of all of the above listed species. Additional enhancement measures were also identified including the creation of suitable terrestrial habitat for Great Crested Newts and reptiles, enhancement of riparian and grassland areas, enhance plant species within semi-improved grasslands and Swift nesting boxes. Further mitigation measures including a Construction Environmental Management Plan to protect species such as otters and water voles during the construction phase, appropriate lighting schemes and habitat manipulation to prevent harm to reptiles on site during construction.

6.24 The proposed development is therefore considered to ensure appropriate mitigation and enhancement of protected and priority species, and would provide a net gain for biodiversity. The proposals are therefore considered to meet the requirements of local plan policy CL8, core strategy policy CS5 and paragraphs 170 and 175 of the NPPF.

6.25 The site is also within the Site of Special Scientific Interest Risk Impact Zone for the Stour and Orwell Estuaries Special Protection Area. Policy CL9 of the local plan seeks to prevent development which would harm nature conservation interest of nationally designed wildlife areas. Further to this under the Conservation of Habitats and Species Regulations 2017 requires the competent authority (the council in this instance) to have regard to the Habitats Directive in the exercise of its functions. A Habitats Regulations Assessment was therefore required to be completed for this application, to assess the impact on recreational pressures as noted above.

6.26 Further to the submission of information identifying the potential for recreational opportunities in the vicinity of the site it could be concluded that there would not be 'likely significant effects' from the proposed development, subject to an appropriate financial contribution being secured towards visitor management measures at the Stour and Orwell Estuaries Special Protection Area/Ramsar. The impact on European Protected Sites was therefore concluded to be acceptable and in accordance with policy

CL9 of the local plan and other requirements under the Conservation of Habitats and Species Regulations 2017.

Agricultural Land

6.27 The Best and Most Versatile (BMV) agricultural land is sought to be retained in both local plan policy CL11. This aim is further identified in paragraph 170 of the NPPF, the local plan policy is therefore given full weight. In this instance the 13ha comprises of Grade 3b and Grade 4. This is not BMV agricultural land, and therefore there is no conflict with local plan policy CL11 or paragraph 170 of the NPPF.

7. Heritage, Design And Layout

7.1 Local plan policy HB1 seeks to protect historic buildings which includes their setting. Core strategy policy CS5 also seeks to enhance the historic environment. The NPPF identifies in paragraph 193 that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to an asset's conservation. Policy CS5 however is considered to go further than the NPPF and the duties under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to protect the special architectural and historic interest. Policy CS5 is therefore given less weight, but local plan policy HB1 is still considered to have full weight.

7.2 To the west of the site stands Rutters Farmhouse, a listed building, which is accessed from Somersham Road. The farmhouse faces the site across the junction of Somersham Road and Loraine Way. Until the junction was improved in modern times, Somersham Road continued to the south of the farmhouse before joining Loraine Way, and a pair of cottages stood directly in front of the farmhouse. The farmhouse's current setting includes open countryside to its west and south, a commercial site to its north, which appears to include its former barn, and the road junction to the east.

7.3 The farmhouse has in the past formed part of a small group of houses, some of which were removed to allow road improvements. The contribution of open countryside to the east of the road to the farmhouse's setting has always been low, and is compromised by the intervening highway junction. Accordingly development of the site would have very low impact on the farmhouse's setting, representing very low harm to its significance.

7.4 The proposed development is therefore considered to have less than substantial harm to the architectural and historic interest of the Grade II listed building, and accord with policy. These harms will be weighed against the public benefits of the scheme as required by paragraph 196 of the NPPF, and to consider the Council's heritage duties under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to protect the special architectural and historic interest, in the conclusion to this report.

7.5 The proposed development therefore leads to some very low harm against policy CS5 of the core strategy and paragraph 170 of the NPPF in relation to protecting landscape qualities, and harm against local plan policy HB1, policy CS5 of the core strategy and paragraph 193 of the NPPF in relation to protecting heritage assets. As required by the NPPF these heritage harms are balanced against the public benefits, and considered in the wider planning balance in the conclusion to this report.

Archaeology

7.6 The site was considered by Suffolk Archaeological Service to have high potential for archaeological interest given its topographically favourable location overlooking the River Gipping, and the fact it is in an area of light, sandy soils, favourable for archaeological activity in all periods. Local plan policy HB14 seeks to ensuring archaeological remains are not destroyed, which is in line with paragraph 189 of the

NPPF that requires where a site has the potential to include heritage assets with archaeological interest, an appropriate desk-based assessment and where necessary field evaluation should be provided. The local plan policy is therefore given full weight.

7.7 There have been a number of cropmarks of ring ditches in and around the site. Finds from the Bronze Age and medieval times have been found in the vicinity of the site. Further investigations were therefore requested from and provided by the applicants. This identified predominantly archaeological remains from prehistoric and Anglo-Saxon occupation and activity, as well as Roman and Medieval finds. A ring ditch on site was considered by Suffolk Archaeological Service to relate to the remains of a prehistoric burial mound. In-situ preservation of this ring ditch is aimed to be achieved by the applicants in the revisions to the Illustrative Masterplan for the site, but unfortunately Suffolk Archaeological Service (SAS) still raised concerns at the time of writing this report. SAS considered that it was possible for development to be pulled back away from the area of interest, and so Members will note the recommendation seeking delegated authority to satisfactorily resolve this issue.

7.8 It is considered possible for development to avoid artefacts of interest and for them to be preserved in situ, and conditions are therefore recommended to ensure appropriate preservation in-situ of the burial mound, and conditions for the remainder of the site to record and store and other artefacts found on site. The development is therefore considered to comply with the requirements of policy HBE 14 of the local plan and paragraph 189 of the NPPF.

Design

7.9 Whilst this application is only at outline stage, it is important to assess whether a good standard of design can be achieved for the number of housing proposed when considering all other requirements such as appropriate tree protection areas, open space and play space provision, surface water features, road and parking layout and appropriate private amenity space for future residents.

7.10 Policy CS5 of the core strategy seeks to ensure a high quality of design is achieved that respects local distinctiveness, enhancing character and appearance of the district. Policy CS9 of this core strategy also seeks to ensure an appropriate density and mix of housing, with a minimum density of 30 dwellings per hectare. Local plan policies GP1 on design and layout of development, H13 on design and layout of housing development, policy H14 on a range of house types to meet different accommodation needs, and H15 on development to reflect local characteristics all aim to seek a good standard of design.

7.11 These development plan policies are consistent with a number of paragraphs in the NPPF. Paragraph 124 identifies good design is a key aspect of sustainable development, and high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 127 goes on to identify that developments should add to the overall quality of the area, are sympathetic to the surrounding built environment and landscape setting, establish and maintain a strong sense of place, optimise the potential of the site to accommodate development and open space to support local facilities and transport networks, create places that are safe inclusive and accessible, and which promote health and well-being. Regarding the efficient use of land and appropriate densities, paragraphs 122 and 123 of the NPPF ensure an efficient use of land, whilst considering accessibility, character and setting of an area, that it is well designed, attractive healthy places and other policies in the NPPF are adequately considered. The development plan policies are therefore given full weight.

7.12 The illustrative layout has been amended as this application has been negotiated. The resulting scheme now is one that takes account of the landscape impact and heritage features. With regards to design the indicative masterplan has shown it is possible to retain these above important features on site and provide a range of dwelling sizes, adequate open space, parking and private gardens.

7.13 The density of the built form (net density) would be 35 dwellings per hectare. With the open space included (gross density) this reduces to 15 dwellings per hectare. The density of the built form would be in accordance with policy 9 of the core strategy and paragraphs 122 and 123 of the NPPF, but more importantly it would be of a similar density to existing adjacent development. The development at Willowbank is approximately 31 dwellings per hectare (net density).

7.14 The Design and Access Statement (DAS) identifies the scale of development to potentially be predominantly 2 storey around the edge of the site with up to 2.5 storey in the centre of the site (notwithstanding two 3 storey buildings as detailed further below in the affordable housing section of this report). These will need to be carefully designed at the reserved matters stage to ensure the development sits comfortably within the sloping landscape of the site, but the 2 storey element to the south and east of the site is welcomed and considered to respond positively to the surrounding scale of development.

7.15 The DAS also identifies that building form and materials will respond to the local context and refer to the Suffolk Design Guide, and will need to have regard to Bramford Parish Plan and Village Design Statement 2012. These details will be considered at the Reserved Matters stage.

7.16 Further consideration would be required at the reserved matters stage for the full design details to ensure the provisions of Section 17 of the Crime and Disorder Act 1998 could be met, and appropriate materials are used.

7.17 In this regard, the indicative design and layout demonstrates it will be possible to ensure a final design at the reserved matters stage reflects local distinctiveness and creates a positive sense of place, and that is sympathetic to existing built environment and landscape setting. An appropriate scheme is considered to be achievable at the reserved matters stage to be in accordance with local plan policies GP1, H13, H14 and H15, policies CS5 and CS9 of the core strategy and paragraphs 124, 127, 122 and 123 of the NPPF.

Open space and green infrastructure

7.18 Local plan policy RT4 seeks amenity open space and play areas within residential development. Development of 10 or more dwellings should provide open space and play space. The requirement to provide open space for the benefit of recreation and health is seen in paragraph 91 of the NPPF which seeks to ensure planning decisions achieve healthy, inclusive and safe places, including open space and accessible green infrastructure. Paragraph 96 also identifies access to a network of high quality open spaces is important for the health and well-being of communities, as does paragraph 127 on design and accessibility of places. The local plan policy is therefore considered to align to the aims of the NPPF and is given full weight.

7.19 The requirements for providing open space and play are further detailed in the Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation (2007). As this is outline consent it is not possible to specify the exact amount of open space needed, as the dwelling size mix is not yet known. However, the proposed plans provide 7.46ha of open space, which would be in excess of these standards. The development also provides good opportunities for links to green infrastructure networks, with accessibility to Bramford Meadows and the Gipping Valley River Path and the development would secure Public Rights of Way improvements totalling £21,750 to upgrade, resurface and widen approximately 340m of footpath FP11 in Bramford. The development is therefore considered to provide sufficient open space, play space and green infrastructure links that can be secured as required through a Section 106 agreement and designed on site at the reserved matters stage in line with policy RT4 of the local plan and the above supplementary planning document, and paragraphs 91, 96 and 127 of the NPPF.

Affordable housing

7.20 The proposed development would require 68 affordable units on the site to meet the requirements of 35% affordable housing under altered policy H4. Paragraph 64 of the NPPF seeks major development to have at least 10% affordable housing. As this local plan policy was updated in 2016 reflecting local housing need based on house prices, rents, affordability and housing needs it is considered to align with the NPPF and carry full weight.

7.21 The illustrative masterplan has demonstrated how the affordable housing could be located throughout the site to ensure affordable dwellings are integrated into the wider scheme. The final choice of materials will be important to ensure all dwellings on site are 'tenure blind' and no differentiation can be made on tenure based on appearance or materials. An appropriate affordable housing mix has been identified by the Council's Strategic Housing Officers, and would be secured through a Section 106 agreement. Further to the recent reconsultation, the applicant has advised that to accommodate the acceptable mix of affordable housing on site the illustrative masterplan and parameter plan for building height would need to be revised. It is likely two buildings on the site would need to be three storey. It is considered with appropriate design measures identified by the applicants that this is likely to be acceptable and would assimilate into the site as there are only two buildings at this height across the wider site. For reference, the adjoining site also has three storey dwellings permitted and so this scale of development will relate well to other adjacent built form. Delegated authority is sought however for these revisions to be made to the illustrative masterplan, reconsultation to be undertaken on these plans and subject to no further substantive comments being received authority be granted to officers to approve the development. Subject to the acceptability of these final revisions, the requirements of policy H4 and paragraph 64 of the NPPF are therefore considered to be met.

7.22 Overall the design of the scheme is considered to have been adequately demonstrated to show that all considerations including ecology, landscape features, open space and affordable housing can be provided on the site to a good standard of design. These will ultimately be determined through the reserved matters but the illustrative plan submitted demonstrates a good standard of design is possible within this site.

8. Surface water, foul water, contamination and minerals

Flood risk

8.1 The site is located on a Principal Aquifer and within the Inner and Outer Zones of a Groundwater Source Protection Zone. It is therefore important to ensure no contaminants enter groundwater from this site, in accordance with policy SC4 of the local plan.

8.2 The site is located within Flood Zone 1, 2 and 3a, but the proposed 'more vulnerable' residential and pre-school facility development are solely located within flood zone 1, the lowest area of flood risk, even if a 1 in 1000 year flood event when applying a 65% climate change allowance, which is where development is directed to in accordance with paragraph 155 of the NPPF. Therefore the sequential test is met and there is no need to apply the exceptions test under paragraph 163 of the National Planning Policy Framework.

8.3 To ensure the proposals are in accordance with core strategy policy CS4 on Adapting to Climate Change and paragraph 150 of the NPPF which seeks to avoid increasing vulnerability to impacts of climate change, the development needs to demonstrate it does not increase flood risk elsewhere. Paragraph 170 of the NPPF also seeks to ensure new development does not contribute to water pollution, and as this site is in an Outer Zone of a Groundwater Protection Zone and Principal Aquifer the

water quality of surface water run-off is a key issue. As the provisions of the development plan policy CS4 and the NPPF align, this policy is considered to carry full weight.

8.4 The site is at low risk of flooding from all sources, but there is some potential for surface water flooding along the north and east areas on the site, outside of the proposed development, and to the south of the site, adjacent to the existing drainage ditch. To address potential surface water flooding in extreme surface water events it is proposed that ground floor levels are set a minimum of 300mm from surrounding ground levels and exterior ground levels across site will be appropriately contoured to direct surface water away from dwellings.

8.5 The proposed development would create impermeable surfaces which could lead to an increase risk of overland flow on the site. A surface water drainage strategy has been submitted which indicates infiltration has been investigated and will be used where possible. If this is not feasible then surface water will be attenuated on site through permeable paving/swales through to an open attenuation feature in the central open green corridor, with a controlled discharge at greenfield runoff rate into the River Gipping. The Internal Drainage Board have indicated that flows could be accepted subject to an appropriate agreement with them.

8.6 Appropriate surface water treatment stages would be secured in the surface water drainage features to ensure no pollutants enter the wider watercourses or underlying aquifer. A suitable maintenance and management of the system will also be secured through condition.

8.7 The Lead Local Flood Authority (LLFA) have no objections to the proposed surface water drainage strategy subject to appropriate conditions for further detailed surface water drainage strategy, management of those features and a surface water management plan during the construction phase.

8.8 Anglian Water have indicated they have capacity for wastewater treatment and used water/foul sewerage capacity in the network, provided flows go into gravity discharge regime to manhole 0101. A drainage strategy is to be secured through condition.

8.9 The former use of the land was agricultural. The likelihood of contamination being found on the land is low, but there is a record of contamination on the site. Conditions are recommended to address potential contamination on site in accordance with paragraph 178 of the NPPF.

8.10 The potential for the additional traffic to have an adverse impact on the surrounding air quality has been considered, but due to the scale of the development it is unlikely to result in a deterioration of good air quality in area, meeting the requirements of paragraph 180 of the NPPF.

8.11 The proposed development would therefore meet the requirements of the policy CS4 and paragraphs 150, 155, 163 and 170 of the NPPF to protect groundwater and ensure the development does not increase flood risk elsewhere.

Minerals

8.12 The site lies within the mineral consultation area under Suffolk County Council's Mineral Core Strategy 2008. Policy 5 of this document requires that any proposed development on unallocated sites over one hectare will be safeguarded from development unless it can be shown that sand and gravel present are no of economic value or that mineral will be worked prior to development taking place. This is considered to align with paragraphs 203 and 204 of the NPPF, and so can be given full weight.

8.13 In this instance the Mineral Planning Authority have not responded to the consultation for this application. But it is considered unlikely that this site would be suitable for mineral extraction due to the close proximity to other residential dwellings. This is the position taken on other sites recently in Claydon.

However a condition is recommended to ensure any mineral extracted from site during construction process is quantified. With this condition the proposed development would therefore be in accordance with paragraph 203 and 204 of the NPPF.

9. Impact On Residential Amenity

9.1 Local plan policy H16 seeks to protect existing residential amenity. This requirement is also identified in paragraph 127 of the NPPF which requires good design to create places with a high standard of amenity for existing and future users. The local plan policy is considered to align with the NPPF and carries full weight.

9.2 There are residential dwellings directly to the west boundary of this site. There are dwellings on the west side of Loraine Way and the development known as Willowbrook to the south, but these two areas are at a sufficient distance to not be adversely affected by the proposed development. The dwellings that back onto the application site however would be the most affected by the proposed development.

9.3 There is intervening vegetation to the rear of these dwellings, which would provide some screening to the application site. On querying this with the applicants, this vegetation is in the ownership of the applicants and will be retained in situ.

9.4 The eventual impact on privacy, outlook, daylight and sunlight would be assessed at the reserved matters stage, when the form of development is being considered. The existing dwellings are considered to be set back at a reasonable distance so that they would not have an undue loss of outlook with the proposed development, or future residents have a poor level of privacy. These impacts could be appropriately addressed at reserved matters stage.

9.5 The loss of the view of the fields and river valley has been raised in letters of representation. There is no right to a view under planning law and so this cannot be a reason to refuse development. The introduction of dwellings to the rear of the existing dwellings would lead to some disturbance from general noise associated with residences, such as vehicle movements. Whilst there would be some noticeable additional noise it would not be to a level that would lead to a significant loss of amenity.

9.7 The uses surrounding the site have been considered for impact on amenity of future residents of the proposed development. The neighbouring uses of the water park, golf range and river valley walk are considered to be at a sufficient distance to not lead to an adverse impact relating to light pollution, noise or privacy for future residents of the scheme.

9.6 The proposed development is not considered to give rise to such significant impacts that the scheme would lead to an unacceptable level of amenity in terms of policy H16 of the local plan and paragraph 127 of the NPPF, and amenity can be addressed at the reserved matters stage.

10. Planning Obligations / CIL

10.1. The following contributions are proposed to be secured to meet the infrastructure requirements of the proposed development, as required by altered policy H4 (affordable housing), and policies T4 (highways) and RT4 (recreational space) of the local plan and core strategy policy CS6. These policies to secure infrastructure are considered to be in line with paragraph 34 and 94 (relating to schools) of the NPPF, and therefore given full weight. These are:

- Affordable Housing – 69 units of both affordable rented and shared ownership. Precise housing mix to be agreed and the following provisions:

- Properties must be built to current Homes England requirements and to the Nationally Described Space Standards as published March 2015.
- The council is granted 100% nomination rights to all the affordable units on first lets and 75% on subsequent lets.
- The affordable units will be built out in phases across the development in locations to be agreed at Reserved Matters stage if the outline application is approved.
- Shared Ownership units have a maximum initial share purchase threshold of 70%
- Affordable housing units must be transferred freehold to an approved RP.
- Where there are more than 15 affordable units, they should not be located in clusters of more than 15 units.
- Adequate parking provision is made for the affordable housing units
- Site for a pre-school facility and contribution of £297,500 for build cost of this
- Open space and play space provision and management
- Highway improvements:
 - A1071/B1113 Beagle Roundabout – junction improvements to widen approach lanes to roundabout (although this is under discussion at the time of writing this report as outlined earlier.)
 - New zebra crossing on B1113 to the north of Wild Man Public House
 - B1113/Burstall Lane – reduce kerb radii and install uncontrolled pedestrian crossing
 - New cycle link between Sproughton and Bramford – cycle link on Loraine Way/footway improvements
- Recreational Access Disturbance Mitigation Strategy contribution - £168 per dwelling
- Travel Plan (to be confirmed by Highway Authority).

10.2 The development would be liable for CIL contributions, which would be sought for provision of primary school expansion, secondary school places, library services, household waste and recycling centre provision and healthcare provision. Liability would be calculated at the reserved matters stage, and collected on commencement of development.

10.3 Provided these S106 contributions are secured there is no objection from the Local Education Authority regarding school capacity, the Local Highway Authority regarding impact on the wider road network or affordable housing provision and open space provision in line with policies H4, T4 and RT4 of the local plan and core strategy policy CS6, and paragraphs 34 and 94 of the NPPF.

11. Delivery

11.1 The NPPF makes clear in paragraph 59 that it is the Government's intention to significantly boost the supply of housing and in support of that objective it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Paragraph 76 of the NPPF also states that in order to help ensure proposals for housing developments are implemented in a timely manner, a shorter time limit can be considered, provided it does not affect its deliverability or viability.

11.2 The deliverability of a development is an important factor in an assessment as to its sustainability (in terms of its benefits) and in terms of its contribution to the supply of housing in the District; considered to be more compelling in the event that there is a demonstrable shortfall in housing supply.

11.3 The NPPF defines deliverable:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.”

and:

“Sites with outline planning permission... should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

11.4 The PPG gives further guidance on those considerations under the chapter heading, ‘*Housing and economic land availability assessment*’ and including three, important concepts: suitability, availability, and achievability. Whilst primarily aimed at aiding the plan-making process, the principles are no less useful when considering the deliverability of this development. The PPG also identifies information relating to site viability, ownership constraints or infrastructure provision, and a statement of common ground between the local planning authority and the developer confirming the anticipated build-out rates.

11.5 To detail the delivery of this site further a Site Delivery Plan was submitted in support of this application. The statement identifies it is considered the site is available and suitable for development and achievable, with a forward timescale for delivery on the site within five years and other examples of delivery on the site to the south, Willowbrook.

11.6 The statements and assumptions made in the Delivery Statement are considered to be fair and reasonable by officers. The only weaknesses of this delivery statement is that there is no certainty over the eventual developer, but the applicant advises there has been a significant interest in sites within the Bramford area.

11.7 The site is considered to be suitable for development, as detailed further in the conclusion and planning balance to this report, providing significant benefits of housing, affordable housing, biodiversity net gain and securing the preservation of archaeological remains on site. The site is available as there are no known legal or ownership problems relating to this site. The development is also considered achievable as there are no known viability issues when taking account of the Section 106 provisions and required Community Infrastructure Levy payments.

11.8 The applicant has also agreed to a shortened timescale for the time limit for commencing the planning permission, which would be in line with the delivery timetable they have presented. The site and development proposed is therefore considered to be suitable, available, and achievable, with officers not considering that there are any constraints that would unduly inhibit delivery.

11.9 The evidence presented in the Delivery Statement is considered to demonstrate that the site is deliverable in line with the considerations of the NPPF and PPG, and therefore substantial weight is given to the consideration of housing delivery in this instance, where: the development would of itself make a significant contribution by way of housing delivery and there is support for an assertion that the development is deliverable; and, further, where there is a confidence and reasoned expectation that the development would make a valuable contribution to the five-year land supply period in the short-term and at an expeditious rate.

11.10 The consideration of delivery and weight will be balanced in the conclusion to this report.

12. Other matters

12.1 Section 143 of the Localism Act 2011 on local financial considerations requires consideration to be given to the financial benefits a development would bring to the council through grant income, such as New Homes Bonus, Community Infrastructure Levy, Council Tax and Business Rates. However the financial benefits this scheme would deliver need to be weighed against the different issues raised above, and put into the planning balance when considering the merits of the application.

12.2 Fire hydrants would be conditioned to any approval issued.

12.3 It is noted that Suffolk County Council request some housing on site is housing with care for older people. A mix of housing is proposed on the application site, but none specifically for older people. In the absence of a clear policy requirement for housing for older people in the development plan it is not possible to insist it is provided.

12.4 Superfast Broadband connections are also requested by the County and provision supported by paragraph 112 of the NPPF. This is a service provided by a private company and so cannot in itself be secured through planning consent. A condition can be applied to ensure there is sufficient space for the required cabling to each dwelling within the development and is recommended as such.

12.5 The development would be required to be built to Code for Sustainable Homes (CfSH) level 6 by 2016 under policy CS3 of the core strategy. However, the Written Ministerial Statement made in March 2015 is clear that requirements should not be set over CfSH level 4 due to revised Building Regulations Part L1A and Part G that came into force in 2015. Meeting revised Building Regulations is considered to provide a good standard of construction, carbon dioxide emissions rate, energy performance of buildings and reduced water usage of 125 litre of water per person per day. Whilst the design and orientation of dwellings would be determined at an outline stage, along with the required compliance with Building Regulations the proposed development is considered to meet the requirements of paragraph 150 of the NPPF which seeks to reduce greenhouse gas emissions. A condition is recommended for a Sustainability and Energy Statement to detail the measures to be taken.

12.6 The application has been screened through the application process as to whether an Environmental Impact Assessment (EIA) was required. This development and other consented and allocated developments have been considered. Given the scale and nature of the proposed development, along with the character, constraints of the surrounding area, it is not considered that the proposed development would result in significant effects on the environment, whether in isolation or in combination with any other developments in the locality. An Environmental Impact Assessment under the Town and Country Planning (Environmental Impact Assessment) Regulations 2015 was not required to assess the environmental impacts of the scheme.

PART FOUR – CONCLUSION

13. Planning Balance and Conclusion

13.1 The principle of development on this site is not supported by local plan policy H7, CS1 and CS2 of the Core Strategy and FC2 of the Core Strategy Focused Review. These however are considered to be out-of-date and not be consistent with the aims of the NPPF and therefore accorded less weight. This position was identified in the appeal decision for appeal APP/W3520/W/18/3194926 at land at east side of Green Road, Woolpit which is a material consideration. Policy FC1 of the Core Strategy Focused Review repeats the requirements of the former paragraph 14 of the NPPF, which is replaced now with paragraph 11 which is the more relevant consideration and so this policy is afforded less weight. Policy FC1.1 seeking to conserve and enhance the local character of different parts of the district, is up-to-date

and relevant to this application. These two policies seek to promote the principles of sustainable development.

13.2 In this instance, the public benefits of the proposal are summarised as including the following:

- Through the delivery of 195 dwellings of an appropriate housing mix, including the delivery of 35% (69) affordable homes, the proposal would have inherent social and economic benefits and would meet housing needs and delivery of growth
- Significant areas of informal open space
- Net gain for biodiversity

13.4 The site would have some short-term economic benefits from construction jobs during the build-out of the site, and there would be some economic benefits for local services such as shops and public transport from additional spend from the new residents to the area. These benefits would have moderate weight.

13.5 There would be environmental benefits from net gain for biodiversity. As this is a requirement of the NPPF however only moderate weight can be given to the scheme demonstrating this. There would also be social benefits. The site is located in a fairly sustainable location, reducing the need to travel and facilitating the promotion of sustainable transport. The highway improvements to be secured through the S106 agreement again are required to make the development acceptable and so the benefits of these are neutral. The benefits associated with securing a new-pre-school facility and CIL are considered to be neutral as these are required to make the scheme mitigate its impacts on infrastructure.

13.7 With regard to the harms of the scheme, the proposed development conflicts with policy CS5 of the core strategy and paragraph 170 of the NPPF relating to protecting landscape qualities. The policy conflict regarding landscape protection is given moderate weight however due to the mitigation measures identified which lower the level of harm to a moderate level.

13.8 The development would lead to harm to the existing landscape character. The current arable farmland would be developed and there is no avoiding the moderate and adverse harm to this landscape character, contrary to policy CS5 of the core strategy. But given the scale of the proposal the development would not significantly harm this wider landscape character, as there remains much arable farmland in the wider vicinity of the site. There would also be moderate and adverse harm to the river meadows from 650m along the nearby river walk, but it must be noted that there would be enhancements to the existing landscape character through habitat improvement works, as well as have ecological benefits as identified in the above report. The level of conflict with core strategy policy CS5 and paragraph 170 of the NPPF is therefore reduced to some degree.

13.9 The harms attributed to heritage assets is considered to be less than substantial harm to Rutters Farmhouse. In this instance paragraph 196 of the NPPF direct the harm to be weighed against the public benefits of the scheme. In this instance the public benefits of 195 dwellings are considered to outweigh the less than substantial harm to this setting and the proposed development is not considered to significantly adversely affect the special architectural or historic interest of the Church, in line with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

13.10 The proposed development would not lead to severe impacts on the road network, and is providing highway improvements via S106 agreement.

13.11 When considering the wider planning balance that is required to consider whether this scheme is sustainable development, this scheme would lead to 195 deliverable dwellings of which 69 would be affordable dwellings in a sustainable location These matters are given significant weight in the planning balance.

13.12 The harm to the landscape is present but reduced to a large degree by landscape planting as mitigation. The heritage harm is considered to be less than substantial and outweighed by the public benefits. Overall, subject to confirmation of consultee comments in Late Papers and that revised information addresses previous concerns, it is recommended that the benefits of this deliverable housing in the sustainable location outweigh the landscape harm, the less than substantial heritage harm to the setting of Rutters Farmhouse and the proposed development is considered to, on balance, be a sustainable development. The illustrative masterplan provides enough certainty at this outline stage that all other considerations could be adequately met at the reserved matters stage, or through the Section 106 agreement, planning condition or Community Infrastructure Levy the site would be liable for.

13.13 The moderate landscape harm is considered to be significantly and demonstrably outweighed by the social and economic and environmental benefits of this scheme including biodiversity net gain, to lead to this proposal forming sustainable development, and is therefore recommended by officers for approval, subject to the provisions of the Section 106 agreement and conditions detailed below.

RECOMMENDATION

That, subject to a satisfactory illustrative masterplan to address archaeology and affordable housing mix and subsequent scale of development, authority be delegated to the Acting Chief Planning Officer to APPROVE OUTLINE CONSENT

(1) Subject to the prior agreement of a Section 106 Planning Obligation on appropriate terms

to the satisfaction of the Acting Chief Planning Officer to secure:

- Affordable Housing – not less than 69 units of both affordable rented and shared ownership. Precise housing mix to be agreed and the following provisions:
 - o Properties must be built to current Homes England requirements and to the Nationally Described Space Standards as published March 2015.
 - o The council is granted 100% nomination rights to all the affordable units on first lets and 75% on subsequent lets.
 - o The affordable units will be built out in phases across the development in locations to be agreed at Reserved Matters stage if the outline application is approved.
 - o Shared Ownership units have a maximum initial share purchase threshold of 70%
 - o Affordable housing units must be transferred freehold to an approved RP.
 - o Where there are more than 15 affordable units, they should not be located in clusters of more than 15 units.
 - o Adequate parking provision is made for the affordable housing units
- Site for a pre-school facility and contribution of £297,500 for build cost of this
- Open space and play space provision and management
- Highway improvements in Bramford and Sproughton (total of £184,610)
- Travel plan
- Public Rights of Way improvements (£21,750) to upgrade, resurface and widen approximately 340m of footpath FP11 in Bramford

(2) That the Acting Chief Planning Officer be authorised to APPROVE Planning

Permission upon completion of the legal agreement subject to conditions as summarised below

and those as may be deemed necessary by the Acting Chief Planning Officer:

- Reduced outline time limit
- Approved Plans (Plans submitted that form this application)
- Phasing Condition (To allow phasing of the development and allows spreading of payments under CIL).
- Highways conditions including provision of visibility splays, details of works required to provide access, details of roads and footpaths, construction of roads and footways to binder course level prior to occupation, provision of emergency access and pedestrian and cycle access prior to first use, a construction traffic management plan, surface water disposal from highways, details of parking and turning areas, refuse and recycling bin details.
- Pedestrian and cycle links on site to south
- Phasing and delivery of landscape infrastructure and advance planting
- SuDS details
- Landscape Management Plan for a minimum of 10 years, new and existing planting and SuDs features
- Detailed soft landscaping plan
- Detailed boundary treatment plan
- Detailed hard landscape plan
- Construction Environmental Management Plan (protecting ecology)
- Landscape and Ecological Management Plan
- Biodiversity Enhancement Strategy
- Wildlife sensitive lighting design scheme
- Fire hydrants
- Drainage strategy (Anglian Water)
- Provision of ducting to properties for adequate Broadband connections
- Quantifying minerals extracted from the site
- Written Scheme of Investigation for archaeology
- Site investigation and post investigation assessment for archaeology
- Hours of construction limited to 8am-6pm Mon to Fri, 8am-1pm Sat and no work on Sundays or Bank Holidays
- Contamination
- Sustainability and renewable energy
- Surface water drainage scheme
- Implementation, maintenance and management of surface water drainage scheme
- Details of SuDS on LLFA Flood Risk Asset Register
- Construction Surface Water Management Plan

(3) And the following informative notes as summarised and those as may be deemed necessary by the Acting Chief Planning Officer:

- Pro active working statement
- Highways
- Anglian Water assets
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991
- Works under power lines
- Works adjacent to gas compound

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act
- Archaeology: The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

(4) That in the event of the illustrative layout to accommodate the required affordable housing mix and archaeological issues not being resolved to the satisfaction of the Acting Chief Planning Officer or the Planning obligations referred to in Resolution (1) above not being secured, that the Acting Chief Planning Officer be authorised to refuse the application on appropriate grounds.”
