

## **Committee Report**

**Item 7B**

**Reference:** DC/20/05587

**Case Officer:** Katherine Hale

**Ward:** Battsford & Ringshall.

**Ward Member/s:** Cllr Daniel Pratt.

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## **RECOMMENDATION – APPROVE PLANNING PERMISSION WITH CONDITIONS AND S106**

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### **Description of Development**

Planning Application - Change of use of land for the siting of up to 73 mobile homes (following demolition of existing buildings)

### **Location**

Great Bricett Business Park, The Street, Great Bricett, Suffolk IP7 7DZ

**Expiry Date:** 12/05/2021

**Application Type:** FUL - Full Planning Application

**Development Type:** Major Small Scale - Dwellings

**Applicant:** Birch's Park Homes

**Agent:** RPS Group Plc

**Parish:** Great Bricett

**Site Area:** 2.60

**Details of Previous Committee / Resolutions and any member site visit:** None

**Has a Committee Call In request been received from a Council Member (Appendix 1):** No

**Has the application been subject to Pre-Application Advice:** No

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

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

Major application comprising more than 15 dwellings.

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## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

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### **Summary of Policies**

NPPF National Planning Policy Framework 2019

Core Strategy Focused Review 2012:

FC01 - Presumption In Favour of Sustainable Development  
FC01\_1 - Mid Suffolk Approach to Delivering Sustainable Development  
FC02 - Provision and Distribution of Housing

Core Strategy 2008:

CS1 - Settlement Hierarchy  
CS2 - Development in the Countryside & Countryside Villages  
CS5 - Mid Suffolk's Environment  
CS9 - Housing Density and Mix

Mid Suffolk Local Plan 1998:

GP01 - Design and layout of development  
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 Habitats  
T09 - Parking Standards  
T10 - Highway Considerations in Development  
T11 - Facilities for pedestrians and cyclists

Supplementary Planning Documents:

Suffolk Parking Standards (2019)

**Neighbourhood Plan Status**

This application site is not within a Neighbourhood Plan Area.

**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**

**Town/Parish Council (Appendix 3)**

**Great Bricett Parish Council**

Object for the following reasons:

- There is no infrastructure to accommodate extra units - no shop and no post office, despite the Transport Report stating - *The site is located within an existing residential area and also within walking and cycling distance of existing facilities / services and public transport services.*
- There are inadequate bus services.

- The only place where people can congregate in the village is the Village Hall, which is not large enough for more than 30 people, there is very restricted parking there and walking along the village road is hazardous, at least 2 accidents in the past 3 years. No provision has been made in the plans for a recreational area on the site indoor or outdoor.
- The nearest Primary school is Ringshall - there is no safe way of walking to the school as there isn't a continuous footpath.
- The number of dwellings suggested is going to lead to an unacceptable increase in the traffic on The Street - 73 dwellings will mean at least 73 more vehicles.
- The number of dwellings that the proposed development would add is disproportionate to the settlement size, classified as a 'Hamlet' village in the Joint Local Plan and above the allocation of 31 on the Infrastructure Delivery Plan for Great Bricett.
- The Street is too narrow for large vehicles to pass other traffic safely.
- There will be another entrance from the site within a short distance of the existing Wixfield Park/Paddocks entrance, which will add to the danger to traffic on The Street.
- The existing Doctors' surgeries are already full as are the majority of Dental practices.
- Overdevelopment - the proposed number of dwellings would overwhelm the village.
- Parking will be an issue for residents with more than one car meaning vehicles will be left on the adjacent roads, which is unacceptable and dangerous to road users.
- Poor drainage is already an issue – so additional homes will add to the problem. The Street regularly floods as evidenced on the Highways reporting tool.

### **Ringshall Parish Council**

Ringshall Parish Council object to the proposed application for 73 mobile homes at Great Bricett. This relates to our concerns of the visual and lighting impact, increased demand on existing infrastructure, a lack of amenities and the additional traffic flow generated by this proposed substantial development which would be to the detriment of the hamlet of Great Bricett and surrounding area, including the village of Ringshall.

1) Visual and Light Impact: The Landscape Appraisal (Lucy Batchelor-Wylam, Landscape Architecture, October 2020) provides daytime photographic evidence but does not include a representation of the increased nocturnal road layout lighting levels and the irreversible visual impact on the surrounding extended skyline. It would also increase the amount of lighting and combine with some 25 street lights already in place on the existing Wixfield Park site leading to detrimental effects on wildlife in the surrounding environment.

2) Infrastructure and Amenities Impact: Planning, Design and Access Statement (rpsgroup.com, 4th December 2020) states factual inaccuracies: On Page 6 "Assessment">"Principles for Development">Item 3.4: It is stated here that there is a pub/restaurant, a general store and post office. Currently there are two planning applications relating to the pub/restaurant. Namely, a) change of use into a home and b) listed building consent. Both are being considered by Mid Suffolk District Council (DC/20/05376 and DC/20/05377). Also the general stores and post office closed permanently some two years ago. We would also highlight that Ringshall Primary School is a long walk from the site along muddy footpaths across open farmland. Because of the proposed ages of occupants (over-45s) it is unlikely that the primary school would be utilised by children of middle aged and elderly residents. Local health services are a distance away from this location and would be further stretched.

3) Roads and Traffic: Additional use of the existing road network would have a detrimental effect on residents due to noise, traffic flow and pollution.

### **National Consultee (Appendix 4)**

## **Natural England**

No comments.

## **NHS**

There are no GP practices within a 2km radius of the proposed development, there are 2 GP practices closest to the proposed development and these are both within circa 6km. These practices do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

## **County Council Responses (Appendix 5)**

### **SCC Development Contributions**

No comments.

### **SCC Highways**

The summary of our findings are as follows:

- The Street (Pound Hill) is a 'C' classified highway (C447). The proposed vehicular access onto the highway is within 30mph speed limit. The access can achieve the required visibility splays for the speed limit as shown in Design Manual for Roads and Bridges (DMRB).
- the proposal will generate 42 vehicle trips in the evening Peak Hour; approximately 1 vehicle every 1.5 minutes.
- a new footway is proposed from the site to the existing footway network and bus stops allowing a safe route for the vulnerable user. Although the widths are not to current standards, it will be sufficient for the number of expected pedestrians.
- There have been no injury accidents in the past 5 years in the area.

We consider the proposal would not have an impact on the public highway with regard to congestion, safety or parking. This development can provide safe and suitable access to the site for all users (NPPF Para 108) and would not have a severe impact on the road network (NPPF para 109) therefore we do not object to the proposal.

### **SCC Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record, situated north of a medieval priory site with an associated moated site, which is a Scheduled Ancient Monument (BCG 001 and 002). A Roman Road is recorded to the north (RGL 006) and Roman roadside occupation was identified to the north-west (BCG 004). Surrounding the proposed development area, finds scatters of Roman, Saxon and medieval date have also been recorded (BCG 006, 007, 018, 020, 025). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist. There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 199), any permission granted should

be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

### **SCC Flood and Water**

Holding Objection due to insufficient information

### **SCC Fire and Rescue**

A CONDITION IS REQUIRED FOR FIRE HYDRANTS (see our required conditions)

#### **Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

#### **Water Supplies**

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Sprinklers Advised Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system.

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control or appointed Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

### **Suffolk Wildlife Trust**

We have read the Ecological Impact Assessment (Castle Hill Ecology, August 2020) and we are satisfied with the findings of the consultant. We request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted. A Biodiversity Enhancement Strategy should be produced, detailing the how the enhancements made within the Ecological Assessment are to be incorporated within the development, including their locations. A Landscape and Ecological Management Plan should also be produced, to detail how the habitats and open spaces on site are to be appropriately managed for biodiversity, including the management of the grasslands containing bee orchid.

### **Anglian Water**

The applicant states on the application form that the method of foul and surface water disposal is not to Anglian Water network therefore this outside of our jurisdiction to comment.

## **Internal Consultee Responses (Appendix 6)**

### **Landscape**

The submitted Landscape and Visual impact Appraisal (LVA) has been prepared following the principles set out in the third edition of the "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) including an assessment of both landscape and visual sensitivity, magnitude of change and impact. The appraisal is accurate and appropriately describes the range of views that are available surrounding the site, as well as the impact on the local landscape character. It concludes that there will be no significant impact of the proposed development on the landscape or visual amenity.

The proposal retains existing tall, dense vegetation in bund form along the northern perimeter which separates the existing and proposed residential zones. There is a proposed border of trees running along the eastern and southern site boundaries to screen the development from views inward to lessen the visual impact of the proposed development on the outer rural setting.

If minded for approval, we would advise the following recommendations are taken into consideration:

1) It is unclear from the proposed site layout whether existing vegetation on boundaries is to be retained. As advised in the LVA, we would expect existing vegetation to be retained where possible to mitigate visual impact and help ensure there is a sense of maturity to the scheme from day one.

2) Although mobile homes are proposed, we would still expect to see open space provision provided. The existing scheme (Application ref: DC/17/03568) had public open space at the centre of the development, as well as a wider green corridor on the south western edge. We would advise the proposed layout is amended to ensure similar provision is provided for this scheme.

3) Careful consideration should be given to the placing and finish of boundary treatments, signage and fencing. Rural features and treatments such as timber post and rail fencing would be advised where possible.

### **Ecology**

No objection subject to securing biodiversity mitigation and enhancement measures.

### **Environmental Health Sustainability**

The council declared a climate emergency in 2019 and has an aspiration to become Carbon neutral by 2030, it is encouraging all persons involved in developments and activities in the district to consider doing the same. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability. Conditions recommended.

### **Environmental Health Air Quality**

I can confirm that the scale of development at 73 units is unlikely to generate sufficient vehicle movements to and from the site to compromise the existing good air quality at, and around, the development site.

### **Environmental Health Noise, Odour and Smoke**

Environmental Protection have no objections in principle to this application. However, Construction site activities and in particular demolition, have the potential to cause disruption to nearby existing residential premises. As such a condition is recommended.

### **Environmental Health Contamination**

No objection.

### **Private Sector Housing**

There must be due consideration taken in the layout of the site to ensure that the 3 metre boundaries are in place and the homes have no less than 6 metre spaces between them (the separation distance). If a porch attached to the caravan may it protrude 1 metre into the separation distance and must not exceed 2 metres in length and 1 metre in depth.

### **Waste Services**

No objection subject to conditions.

### **Public Realm**

It states that there is no gain, loss or change of use of residential units then goes on to apply for 73 permanent 'park homes.' This must be in error. This is an application for permanent residential development. Does this need correcting on the application form and the then required information about parking, waste, no of people living there etc being included before any comments are made. I am not familiar with the requirements for this type of development. If conventional housing was being built on a 2.60ha site there would be a requirement for a level of open space to be provided. 73 dwellings would require the provision of a play area. There is no indication that this is a development for a particular age group. Without this information it is not possible to make any relevant comments about the provision of open space. At present it is presented as a development of affordable homes but the application does not provide the information to support this.

### **Strategic Housing**

Having considered the proposal and noted in the design and access statement that these are a form of residential housing we consider that this triggers the requirement for an affordable contribution. A proposal of 10 dwellings or more or site size 0.5 hectares or over is defined as major development. In this instance we recommend a commuted sum as the mechanism for the affordable contribution. We will need to discuss this further with you and the applicant as we require further information on the financial aspects of this proposal to establish the commuted sum.

### **B: Representations**

At the time of writing this report at least five letters/emails/online comments have been received. It is the officer opinion that this represents five objections. A verbal update shall be provided as necessary.

Views are summarised below:-

- Increased traffic generation
- Lack of local amenities and services
- Strain on infrastructure including medical centres, schools
- No visitor parking

- No footpath connections.

(Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation.)

## **PLANNING HISTORY**

<b>REF:</b> DC/17/03568	Outline Planning Application (all matters reserved) - Residential development of up to 51 dwellings.	<b>DECISION:</b> GTD 07.01.2019
<b>REF:</b> 3340/16	Installation of a mobile phone base station, consisting of 15m monopole supporting 6no. antennas and 2no. dishes, together with 3no. equipment cabinets and 1no. meter cabinet.	<b>DECISION:</b> DEM 08.12.2016
<b>REF:</b> 1507/10	Erection of extension to existing buildings for the handling of archive material. Part removal of earth bund.	<b>DECISION:</b> GTD 03.08.2010
<b>REF:</b> 3725/07	Proposed 1 no building for the handling of archive material.	<b>DECISION:</b> REF 22.02.2008

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

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

- 1.1. Great Bricett Business Park consists of a cluster of Nissen style buildings located in a cluster to the eastern end of the site. The site is served by an existing access off Pound Hill.
- 1.2. Over half of the site, primarily to the western end, is an area of open space which includes the site frontage directly onto Pound Hill. The frontage is defined by a maintained hedgerow which returns along the northern side of the access road and provides a soft edge to the site. The buildings themselves are located some distance from Pound Hill and are not, therefore, prominent in the streetscene.
- 1.3. To the north of the site is the residential park known as Wixfield Park, which abuts the Business Park and is accessed off Pound Hill to the north of a short run of residences which front Pound Hill. To the east and south of the site are agricultural fields. Further north lies RAF Wattisham, along with the associated dwellings and commercial buildings.
- 1.4. The site was until recently in commercial use. The buildings are currently vacant.
- 1.5. The site is not subject of any landscape designations and is not within the setting of listed buildings or a Conservation Area.

## **2. The Proposal**

- 2.1. The proposed development comprises demolition of existing buildings and the change of use of land at Great Bricett Business Park for the siting of up to 73 mobile homes. The mix of units are as follows: 43 units at 20ft x 40ft (6.1m x 12.2m); 15 no. units at 20ft x 44ft (6.1m x 13.4m); and 15 units at 20ft x 50ft (6.1m x 15.2m).
- 2.2. Each unit will have a single car parking space. Access will be obtained via the existing site access off Pound Hill. The site will be landscaped, and the existing landscape bund along the northern boundary will be retained.
- 2.3. A new (minimum 1.2m wide) footpath is proposed on the eastern side of Pound Hill. It will extend across the site frontage and north along Pound Hill to the Wixfield Park entrance. A new bus shelter is proposed south of the existing site access, on the eastern side of Pound Hill.
- 2.4. The site measures 2.6ha in area, resulting in a proposed density of 28dph.

## **3. The Principle Of Development**

- 3.3. Outline planning permission was granted for residential development of the site for up to 51 dwellings in January 2019 (DC/17/03568). This permission remains extant. Residential intensification of the site is therefore considered acceptable in principle subject to material planning conditions
- 3.4. As set out in the supporting Planning Statement, because of the prefabricated method of construction, the units fall within the definition of 'caravans' in the Caravan Sites and Control of Development Act 1960 (the Act). The form and layout of caravans and related infrastructure is controlled by a separate licensing process under the Act. The Act describes the relationship of the licensing process with planning control. The licensing process determines and controls the form and layout of the internal site, such as caravan density and road infrastructure. This is a separate and distinct process to planning which addresses the principle of use only. Part 5 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) confirms that development required by the conditions of a site licence under the 1960 Act constitutes permitted development. Planning considerations should therefore only relate to the use of the land for the intended purpose (in this case, being the siting of mobile homes), and not make any assessment of any operational development that would accompany the development.
- 3.5. Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development which comprises economic, social and environmental objectives. It states that where the development plan is absent, silent or policies which are most important for determining the application are out-of-date, planning permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF as a whole; or unless specific policies in the NPPF indicate that development should be restricted.
- 3.6. In view of advice in paragraph 11(d) of the NPPF, it is necessary to consider how consistent the most important policies in the development plan are with the NPPF, to assess what weight should be attached to them. Paragraph 213 explains that due weight should be given to relevant policies according to their degree of consistency with the NPPF, the closer the policies in the plan to those in the NPPF, the greater the weight that may be given.

- 3.7 The development plan for the area comprises a combination of the Core Strategy 2008, the Core Strategy Focused Review 2012, and 'saved' policies of the Local Plan 1998. The Joint Local Plan is emerging, currently in Regulation 18 phase with the consultation period completed. In accordance with the requirements of Paragraph 48 of the NPPF, very limited weight is attached to the emerging Joint Local Plan in consideration of the merits of the proposal, given the preparatory stage of the document.
- 3.8 Having regard to the absence of a balanced approach as favoured by the NPPF, the development plan policies most important for determining the application are deemed out-of-date, a position well established by the Inspectorate in recent Mid-Suffolk appeals. This conclusion is reached irrespective of Council's five year housing supply position. As a result, the weight to be attached to these policies has to be commensurately reduced and the default position at paragraph 11d of the NPPF is engaged, that is, granting permission unless:
- (i) the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development or
  - (ii) the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 3.9 Turning first to (i) above, footnote 6 at NPPF paragraph 11d states that the policies referred to at 11d are those in the NPPF relating to: habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets; and areas at risk of flooding or coastal change. Of these areas/assets, none are potentially affected by the scheme.
- 3.10 This leaves the second limb of the paragraph 11d test, requiring an assessment of the adverse impacts and benefits of the proposal, and the associated balancing exercise. In this context the key issues are:
- a) The sustainability of the location;
  - b) The effect of the loss of employment land;
  - c) Housing contribution;
  - d) Landscape character;
  - e) Residential amenity;
  - f) Highway safety;
  - g) Biodiversity values;
  - h) Flooding and drainage;
  - i) Renewable energy;
  - j) Archaeology.
- 3.11 Central to the above tests is having regard to the extant 51 dwelling outline permission, a realistic fallback position and therefore a material consideration that is attached substantial weight. The previous outline consent is extant and therefore constitutes a genuine fallback position. The current employment site is therefore already essentially lost.
- 3.12 Half of the site is brownfield land. Effectively using brownfield land is a core planning principle of the NPPF, as set out at paragraph 118. More specifically, paragraph 118(c) states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes. This aspect of the scheme is accordingly attached substantial weight, as it was by officers in considering the previous 51 dwelling outline application.

#### **4. Nearby Services and Connections Assessment Of Proposal**

- 4.1 The supporting Transport Statement sets out in some detail the available local facilities, their distance from the site and the sustainable transport options on offer, which primarily relate to four local bus services – service 111, 405 (school service), 461 and 462. These services are available via the bus stop (including shelter) located 100m north of the site on Pound Hill. Important in accessibility terms is noting the proposed footway connection that will link the site with the northern bus stop. Additionally, a new bus stop is proposed south of the site entrance. The provision of the footpath link is achievable using either Suffolk County Council land or land within the applicant's ownership. These accessibility improvements (detailed in Appendix C of the Transport Statement) formed part of the previous outline application.
- 4.2 In assessing the 51 dwelling outline proposal in 2019, officers concluded that whilst there would need to be some reliance on the private motor vehicle for some facilities and services, there is access to a range of facilities in the locality, and to some opportunity to travel by means other than the car, such that the site is not isolated.
- 4.3 Since the grant of the outline consent the local store/post office has closed. Objectors note that the public house is the subject of a current redevelopment application and this may too result in the further loss of a local community facility. While these developments are noted, there remains some opportunity to travel by means other than the car to other nearby services and facilities. The proposed pedestrian connection to the existing northern bus stop is critical to enhancing these opportunities, resulting in a likely increase in use of the local bus services, in support of local and national planning policy.
- 4.4 If implemented, the approved 51 dwelling development will generate considerable traffic movements. Although of a lesser density than the current proposal, the (likely) larger dwellings that would be brought forward with a conventional housing estate are likely to generate traffic movements not dissimilar to those generated by the homes subject of the current application. Air quality harm is therefore unlikely to be any greater from the current scheme to that previously approved.
- 4.5 Officers conclude, notwithstanding the local store closure, that the location of the site outside the settlement boundary does not weigh heavily against the proposal, the same conclusion reached by officers in 2017. The site is not isolated in functional terms, nor in the terms of paragraph 79 of the NPPF.

#### **5. Site Access, Parking And Highway Safety Considerations**

- 5.1 The development relies on the existing Pound Hill access arrangement, with no physical changes proposed to it. The Highways Authority confirms the visibility splays at the access are adequate for the proposed level of residential intensification. The Great Bricett Parish Council is critical of the fact there will be another entrance from the site within a short distance of the existing Wixfield Park entrance, which in the Council's view will add to the danger to traffic on The Street. The reality is that the entrance serving the proposed development is already well established. There will be no additional entrances. The existing subject entrance serves a business park. The Highways Authority does not raise a concern in this regard.
- 5.2 One on-site car parking space is proposed for each unit. Some units will be at least two bedrooms and for those units to comply with the Suffolk Parking Standards two on-site spaces should be provided. The Highways Authority does not make comment regarding the proposed level of on-site

parking provision. The Planning Statement contends that the applicant is an experienced Park Home developer, and the proposed level of provision is more typical of developments of this nature. Given the layout of the neighbouring residential park and on-site parking provision available at that development ( a good number of plots only have one on-site space), officers accept that the level of parking provided by the Park Home developer will be at a level that is in their best interests, one that will not result in an adverse outcome for the occupants. The Great Bricett Parish Council suggest that vehicles will be left to park on the adjacent roads, causing a danger to road users. Officers do not consider this a likely outcome nor one that the Park Home developer would likely tolerate, as it would not be in their commercial interests. There is no evidence of such overspill parking at any other residential parks in the district.

- 5.3 The development will result in a significant increase in local traffic generation. The NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. There is no evidence before officers to indicate that the effect on the local transport network by traffic generated from the development would be severe. The Great Bricett Parish Council consider that The Street is too narrow for large vehicles to pass other traffic safely. The Highways Authority does not raise any concern in this regard, nor in respect to increased traffic levels more generally.
- 5.4 Council's Waste Officer does not object to the scheme, concluding that conditions can adequately cover waste collection requirements, including the location of collection presentation points and waste vehicle manoeuvring areas.
- 5.6 The highway issues resulting from the development do not weigh against the proposal, a conclusion consistent with that reached by officers in assessing the previous outline application.

## **6. Design And Layout [Impact On Street Scene]**

- 6.1. Policy CS5 requires development to be of a high-quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district.
- 6.2. Policy H13 of the Local Plan requires new housing development to be expected to achieve a high standard of design and layout and be of a scale and density appropriate to the site and its surroundings, whilst Policy H15 of the Local Plan similarly requires new housing to be consistent with the pattern and form of development in the area and its setting.
- 6.3. Policy GP1 of the Local Plan states that proposals comprising poor design and layout will be refused, requiring proposals to meet a number of design criteria including maintenance or enhancement of the surroundings and use of compatible materials.
- 6.4. Paragraph 124 of the NPPF attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development. The aforementioned design policies are considered to be consistent with the NPPF.
- 6.5 The site sits adjacent an existing mobile home, and as such the proposed development maintains the character and appearance of the area whilst also respecting the scale and density of the surrounding development. The units would be situated in spacious plots with one parking space provided for each plot.

- 6.6 The design and layout proposed is considered to respect and reflect the character of the locality, particularly given the adjacent site. This is considered to be acceptable and to comply with Local Plan Policies GP1, SB2, H2, H13 and H15, Core Strategy Policy CS5.

## **7. Landscape Impact, Trees, Ecology, Biodiversity And Protected Species**

- 7.1 Policy CS5 of the development plan seeks to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encouraging development that is consistent with conserving its overall character.
- 7.2 The NPPF provides that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils.
- 7.3 The NPPF requires planning authorities, when determining planning applications, to seek the conservation and enhancement of biodiversity by ensuring significant harm resulting from a development is avoided (through locating on an alternative site with less harmful impacts), or where not possible to be adequately mitigated, or, as a last resort, compensated for, and if this cannot be secured then planning permission should be refused.
- 7.4 The application is supported by a landscape assessment that has been reviewed by Council's landscape consultant. The consultant does not object to the scheme provided the development incorporates some open space within the site, retains the perimeter vegetation and boundary treatments adopt a rural appearance. These matters can be addressed by planning conditions.
- 7.5 Officers consider that any landscape character harm will be of a very low level having regard to the following:
- a) The character, form and appearance of the development will very closely follow the abutting northern residential park. The development will thus read as a natural extension of the residential park, an infill between established built form, rather than a housing cluster detached from the settlement.
  - b) The continuation of the established residential park character will be less visually impactful than the 51 dwellings previously approved at outline stage.
  - c) The site's visual containment is of a very high level, with all dwellings proposed within established site boundaries. These boundaries are clear, logical and natural.
  - d) The development will not present as intruding into open countryside.
  - e) Caravans will present to Pound Hill in a manner consistent with the orientation of adjacent dwellings fronting Pound Hill.
  - f) Scale is limited to single storey, a less obtrusive outcome than the likely double storey dwellings (in part) that would result if the outline consent is taken forward.
  - g) Established perimeter vegetation can be retained by planning condition.
  - h) The 28dph density, whilst higher than the previously approved scheme, is consistent with the density of the neighbouring residential park.
- 7.6 It is concluded that the development would not be harmful to the local settlement pattern. The development responds favourably to local design Policies GP01, H13 and H15.

- 7.7 In assessing this application due regard has been given to the provisions of the Natural Environment and Rural Communities Act, 2006, in so far as it is applicable to the proposal and the provisions of Conservation of Habitats and Species Regulations 2010 in relation to protected species.
- 7.8 The application is supported by a Preliminary Ecological Assessment (PEA) that has been reviewed by Council's Ecology Consultant. The PEA contends that the incorporation of biodiversity enhancements as part of the scheme will improve biodiversity beyond that which the current conditions may support, maximising opportunities for biodiversity in line with the NPPF. The consultant does not object to the scheme, is in agreement with the PEA recommendations and suggests planning conditions can secure biodiversity enhancements. Officers concur.
- 7.9 The Ringshall Parish Council raises concern regarding potential for light pollution and consequential impacts on local wildlife. Council's landscape consultant has considered this issue and deems it appropriate and justified to require the submission of a Wildlife Friendly Lighting Strategy. The Strategy is expected to include a technical specification demonstrating measures to avoid lighting impacts on foraging/commuting bats. This matter can be readily addressed by planning condition as per standard planning practice.

## **8. Land Contamination, Flood Risk, Drainage and Waste**

- 8.1 Environmental Health confirm that there is no objection to the proposal in this regard.
- 8.2 SCC Flood Water Management currently have a holding objection as the currently submitted Flood Risk Assessment is indicative and is not considered satisfactory in assessing the impacts the application would have on surface water drainage/flooding.
- 8.3 It is therefore recommended that should Members be minded to resolve to grant this proposal that this be subject to all drainage matters being resolved during the course of the S106 negotiations. In the event that these matters cannot be fully resolved the S106 will not be completed and the application will be returned to Committee.

## **9. Housing Contribution**

- 9.1 The proposal is not your usual 'bricks and mortar' housing development. The development provides low cost, affordable housing that fits within the NPPF affordable housing definition: *'housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes ...other low cost homes for sale (at a price equivalent to at least 20% below local market value)'*. The proposed dwelling typology is a relatively uncommon type of housing in Mid-Suffolk, with only 0.6% of the total stock in the district comprising park homes/caravans (2011 Census). The addition of 73 homes of this type would therefore increase local housing choice and add variety to the local housing stock, in support of Policy HS14 and Policy CS9.
- 9.2 Policy CS9 requires, amongst other matters, to ensure that housing developments make best use of land by achieving average densities of at least 30dph. The policy states that lower densities may be justified in villages to take account of the character and appearance of the existing built environment. The proposed 28dph density is deemed to make effective use of the land. As noted below, the proposed density is generally consistent with the density of the adjacent residential park, demonstrating that this is not a village location where a lower density is warranted.

- 9.3 Whilst the site does not provide affordable homes, it is considered that a commuted sum would be required for the development, particularly given the fact that a commuted sum was indeed provided for the existing adjacent development. Ongoing negotiations with regards to a commuted sum figure are currently taking place and Officers would hope that this could be provided to Members through tabled papers prior to committee.

## **10. Impact On Residential Amenity**

- 10.1 The development will not unduly impact the amenity of neighbouring residents given the physical relationship to the nearest residences. The modest single storey scale of the dwellings also helps to mitigate adverse amenity impacts.
- 10.2 Council's Environmental Health Officer recommends a construction management plan. This recommendation is supported given the proximity of the site to a large number of adjoining dwellings.
- 10.3 In regards to the amenity of future occupants, the site layout plan indicates relatively constrained outdoor private amenity spaces for each dwelling. Such an amenity outcome is not uncommon for residential parks of this nature. The typical occupants of residential parks usually have lower on-site amenity expectations in this regard. Officers in this regard acknowledge the concern of the Great Bricett Parish Council who observe the lack of on-site recreational area provision. However as already noted earlier in this report, consideration of the operational development is beyond Council's discretion. This element of the scheme is governed by the 1960 Act licensing process.
- 10.4 Subject to compliance with conditions, there are no amenity-related grounds to withhold planning permission.

## **11. Planning Obligations**

- 11.1 Objectors are concerned with the increase in pressure the development will bring about in respect to existing local medical facilities. As noted by the HNS referral response, it is acknowledged that the nearby practices do not have sufficient capacity for the anticipated dwelling increase, however a developer contribution via CIL process will mitigate this impact. In other words, there will be an increase in infrastructure pressure, however the development will provide funding that will mitigate that pressure and also indirectly offset existing deficiencies in provision.
- 11.2 As the proposal is to provide up to 73 mobile homes a commuted sum is required. A S106 Agreement is to be sought to ensure that the commuted sum is delivered.
- 11.3 All the other infrastructure impacts of the proposal would be subject to funding via CIL

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## **PART FOUR – CONCLUSION**

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### **13. Planning Balance and Conclusion**

- 13.1 The development plan policies most important for determining the application are out-of-date, a well-established Inspectorate position regarding proposed housing schemes. Irrespective of Council's five year housing supply position, the weight attached to these policies has to be

commensurately reduced and the default position at paragraph 11d of the NPPF engages. The principal test is determining whether the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.

- 13.2 The benefits in social terms are not insignificant, with the provision of 73 low cost affordable homes offering a very good level of local housing choice and variety, albeit acknowledging the district's five plus year residential land supply position. A different housing typology than the typical 'bricks and mortar' housing estates, the development offers a refreshingly different residential outcome, one that can be delivered in a much quicker timeframe than conventional housing. Economic gains are much more modest, noting the creation of construction jobs will be very limited due to the off-site pre-fabricated approach to house building. This said, the occupants of a 73 dwelling development will bring about a not insignificant increase in local spending, helping sustain local businesses, a local economy benefit of some note.
- 13.3 The brownfield site is very much under-used and, developed with a collection of ad hoc nissen huts, is of low environmental value. There is opportunity through biodiversity enhancements associated with the scheme to enhance this value, while at the same time providing for a more optimal and effective use of the brownfield land. These represent environmental benefits.
- 13.4 A range of potential adverse impacts can be effectively mitigated by measures secured by planning conditions, as confirmed by technical consultees, and these are therefore treated as neutral in the planning balance. They are also, subject to compliance with conditions, policy compliant. These matters include highway safety, on-site amenity, archaeology, drainage and renewable energy.
- 13.5 There is an absence of harm in respect to above-ground designated heritage assets, by virtue of the fact there are no such assets in proximity of the site.
- 13.6 The proposal will result in landscape harm, through the loss of some green space and introduction of built form not of insignificant scale. The harm is however low level because of the developed nature of half the site, the site's high level of visual containment, its infill location set between established housing and the fact the development will read as a natural extension of the adjacent residential park, noting density will be consistent with that already established. Noteworthy also in this context is the absence of any formal landscape designation over the site or neighbouring land. Moreover, it cannot be said that the subject development will result in any greater landscape harm than the approved 51 dwellings that could be brought forward in accordance with outline permission DC/17/03568. Conflict with local and national design policies is, for these reasons, not of great magnitude.
- 13.7 There will be environmental harm associated with private motor vehicle use, as some day to day living will revolve around car journeys, inevitable given the site's countryside location. This said, there are local bus services available very close to the site and the proposed footway and bus stop improvements, supported by the Highways Authority, will enhance the accessibility of these services.
- 13.8 The loss of an employment site is not an adverse effect that weighs in the planning balance by virtue of the fact that the previously approved 51 dwelling development could be brought forward at any time. In other words, the employment site 'horse' has already 'bolted'. The effects of the loss of an employment site are therefore disregarded.
- 13.9 The scheme delivers social, economic and to a lesser extent, environmental benefits. Identified harm relates primarily to landscape character, which is deemed low level. The harm does not significantly and demonstrably outweigh the identified benefits. The proposal delivers sustainable

development, a consideration outweighing the proposal's low level of conflict with the development plan.

13.10 Planning permission is recommended subject to conditions.

### **RECOMMENDATION**

That the application is GRANTED planning permission

**(1) Subject to the prior agreement of a Section 106 Planning Obligation on appropriate terms to the satisfaction of the Chief Planning Officer as summarised below and those as may be deemed necessary by the Chief Planning Officer to secure:**

- Affordable housing
- Off-site highway improvements – footway and bus shelter

**(2) That the Chief Planning Officer be authorised to BLANK Planning Permission upon completion of the legal agreement subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:**

- Standard time limit (3yrs for implementation of scheme/Outline/Reserved/Section73?)
- Approved Plans (Plans submitted that form this application)
- Landscape consultant requirements
- Construction Management Plan
- Archaeology
- Wildlife Sensitive Lighting Design Scheme
- Biodiversity Enhancement Strategy
- Ecological Appraisal Recommendations
- SuDs conditions
- Sustainability and Energy Strategy
- Refuse/recycling storage
- Level access to enable wheelchair access for all dwellings
- Access visibility splays
- Waste Services conditions
- Fire Hydrants

**(3) And the following informative notes as summarised and those as may be deemed necessary:**

- Pro active working statement
- SCC Highways notes
- Support for sustainable development principles

**(4) That in the event of the Planning obligations or requirements referred to in Resolution (1) above not being secured and/or not secured within 6 months that the Chief Planning Officer be authorised to refuse the application on appropriate ground**