

## **Committee Report**

**Item No: 3**

**Reference:** DC/17/05663

**Case Officer:** Elizabeth Thomas

**Ward:** Rickinghall & Walsham.

**Ward Member/s:** Cllr Jessica Fleming. Cllr Derek Osborne.

---

### **Description of Development**

Planning Application - Erection of 30 No. residential units

### **Location**

Land Adjacent to Charters Towers, Gallows Hill, Redgrave, IP22 1RZ

**Parish:** Redgrave

**Site Area:** 1.97 ha

**Conservation Area:** Within a conservation area

**Listed Building:** Affects Setting of Grade II\*

**Received:** 10/11/2017

**Expiry Date:** 20/03/2018

---

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

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

**Environmental Impact Assessment:**

**Applicant:** Mr and Mrs G Topham

---

## **DOCUMENTS SUBMITTED FOR CONSIDERATION**

This decision refers to drawing number 17-050-001-A as the defined red line Location Plan with the site shown edged red. Also as this application is in Full the following drawings are also relevant for consideration.

Location Plan (17-050-001-A)

Proposed block plan (17-050-200)

Detailed block plan (17-050-201)

Units A, B & C (17-050-202)

Units D, E & F (17-050-203)

Unit type G (17-050-204)

Street elevation (17-050-205)

The application, and all other plans and documents submitted by the applicant/agent can be viewed online at [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk). Alternatively a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

---

## **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 development for 15 or more dwellings.

---

## **PART TWO – APPLICATION BACKGROUND**

---

### **History**

Pre-application reference 1295/17 provided basic advice in April 2017 whereby the Council informed of the site and surrounding area constraints, and that the outcome of a formal proposal being submitted would be subject to a comprehensive assessment and formal consultation process being undertaken of the proposals impacts, which this report identifies. Furthermore, Redgrave Parish Council has raised disappointment in the lack of community engagement prior to submission.

It is also important to highlight there was a recent refusal on the site opposite side of the road at Pound Farm, Gallows Hill (application reference DC/17/04467) that emphasises the importance of the conservation area and the areas openness, which significantly contributes to the site and surrounding areas character impacts, which also highlights urbanisation of the area is not appropriate to the historic setting.

### **National Planning Policy Framework**

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

The following parts of the NPPF are considered to be applicable to this proposal.

- NPPF section 01: Building a strong competitive economy
- NPPF section 03: Supporting a prosperous rural economy
- NPPF section 04: Promoting sustainable transport
- NPPF section 05: Supporting high quality communications infrastructure
- NPPF section 06: Delivering a wide choice of high quality home
- NPPF section 07: Requiring good design
- NPPF section 08: Promoting healthy communities
- NPPF section 10: Meeting the challenge of climate change, flooding and coastal change
- NPPF section 11: Conserving and enhancing the natural environment
- NPPF section 12: Conserving and enhancing the historic environment

## **Core Strategy**

The following parts of the Core Strategy Focused Review 2012 are considered to be applicable to the scheme:

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

The following parts of the Core Strategy 2008 are considered to be applicable to this scheme:

CS01 - Settlement Hierarchy  
CS02 - Development in the Countryside & Countryside Villages  
CS04 - Adapting to Climate Change  
CS05 - Mid Suffolk's Environment  
CS06 - Services and Infrastructure  
CS09 - Density and Mix

## **Neighbourhood Plan/Supplementary Planning Documents/Area Action Plan**

5.1. There is currently no neighbourhood plan for Redgrave, but there is a Redgrave Parish Plan (2005)

5.2 There is a Redgrave Conservation Area Appraisal (2011)

5.3 An initial Joint Local Plan consultation has been undertaken back in August 2017 which was for the early stages of consultation Regulation 18.

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

The following parts of the Mid-Suffolk Local Plan 1998 are considered to be applicable to this scheme:

FC01 - Presumption In Favour Of Sustainable Development  
FC01\_1 - Mid Suffolk Approach to Delivering Sustainable Development  
FC02 - Provision and Distribution of Housing  
CS01 - Settlement Hierarchy  
CS02 - Development in the Countryside & Countryside Villages  
CS04 - Adapting to Climate Change  
CS05 - Mid Suffolk's Environment  
CS06 - Services and Infrastructure  
CS09 - Density and Mix  
GP01 - Design and layout of development  
SB02 - Development appropriate to its setting  
HB13 - Protecting Ancient Monuments  
HB14 - Ensuring archaeological remains are not destroyed  
HB15 Positive action to learn from archaeological remains  
H07 - Restricting housing development unrelated to needs of countryside  
H04- Altered Policy H4  
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  
H17 - Keeping residential development away from pollution

CL2 Development within special landscape areas  
CL9 Recognised wildlife areas  
CL10 Wildlife value of rivers and other water areas  
HB8 Safeguarding the character of conservation areas  
CL08 - Protecting wildlife habitats  
CL11 - Retaining high quality agricultural land  
T09 - Parking Standards  
T10 - Highway Considerations in Development  
RT12 - Footpaths and Bridleways  
RT04 - Amenity open space and play areas within residential development  
HB01 - Protection of historic buildings  
SC4 Protection of groundwater supplies  
SC5 Areas at risk from flooding

### **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**

##### Redgrave Parish Council

Object raising the following matters:

Village character, density and design  
Transport/sustainability and access  
Social Issues and amenity  
Monuments Record  
Ecology  
Surface water drainage  
Loss of agricultural land  
Self-build and affordable housing  
Lack of community engagement prior to submission

##### Environment Agency

No comment.

##### SCC Development Contributions

The majority of the infrastructure requirements in this case would be required via CIL rather than through planning obligations:

Provision of passenger transport  
Provision of library facilities  
Provision of additional pre-school places at existing establishments  
Provision of primary school places at existing schools  
Provision of secondary, sixth form and further education places  
Provision of waste infrastructure

Transportation matters would be dealt with via conditions and Section 106 as appropriate, and infrastructure delivery to adoptable standards via Section 38 and Section 278. Transport matters include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site).

---

### SCC Flood and Water Officer

Holding objection, no identification or design a surface water drainage system for the road infrastructure

### Arboricultural Officer

A large mature English Oak tree in the north/west corner is of particular merit. It is noted for retention, but there is concern about the close proximity of development that could lead to adverse impact during construction and future pressure for pruning/removal. A more detailed assessment would be beneficial for additional space in the layout design if necessary.

### Infrastructure Team

The proposal lies within the high valve zone for MSDC CIL charging and would be subject to a CIL rate of £115m2 (subject to indexation).

### SCC Fire and Rescue

Access to buildings for fire appliances and firefighters must meet with building regulation requirements and the fire and rescue service require a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes. Fire hydrants are to be installed within the development on a sustainable route for laying hose and avoiding obstructions. The number of hydrants required is not determined currently and would be determined at the water planning stages. Consideration to fire sprinkler system and flow rates will need to be considered.

### Strategic Housing Officer

No objection supported as the development will meet the local housing needs as identified in The Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) document as updated in 2017, which confirms that there is a continuing need for housing across all tenures and a growing need for affordable housing. In this case the proposal would accommodate 9 (75%) affordable rent and 3 (25%) shared ownership.

### Ecology

Holding objection, the submitted ecology report does not examine what designated sites, protected species and priority species/habitat may be present and affected by the proposed works. Consequently, there is insufficient ecological information for determination of this application. There are records of bats, hedgehogs and swifts nearby to the proposed development. Full regard and responsibility needs to be had to Circular 06/2005 (sections 98 and 99).

### Archaeology

The site is in an area of high archaeological potential on the County Historic Environment Record, near the tumulus marked on the 1<sup>st</sup> edition OS map (1837-1840) (RGV 008) find spots of Saxon Cinerary Urns (RGV 005) and other Saxon artefacts (RGV 004). It overlooks the sources of both the rivers Little Ouse and Waveney to the north lower in the valley and is on sandy soils which tended to attract early occupation. Due to the quarrying like most nearby there is a 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.

Given this high potential and lack of previous investigations and size of the proposed development area, the proposal should be required to provide for an archaeology evaluation of the site prior to the determination, which could potentially influence design amendments if needed to preserve remains in situ.

---

### Environmental Health - Noise/Odour/Light/Smoke

The proposal is approximately 600 metres from an agricultural rearing and processing unit. This site is “permitted” by the Environment Agency who regulates the operation and would deal with most issues arising from it. No objection, but recommend the following conditions:

Hours of work, Smoke, Dust and Light

### Historic England

Do not wish to offer any comments. It is suggested to seek the views of specialist conservation and archaeological advisers, as relevant.

### Heritage and Design

A moderate level of less than substantial harm to a designated heritage asset because it would have a negative impact upon the character and appearance of the conservation area and the setting of nearby listed buildings.

### Anglian Water

No assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

Foul drainage from this development is in the catchment of Redgrave and will have available capacity for these flows.

The sewerage system at present has available capacity for these flows. If the developer wishes to connect to Anglian Water sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. The most suitable point of connection can be advised.

The proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The LPA should seek advice from the LLFA or Internal Drainage Board.

### SCC Highways

The principle is accepted, but the proposal details are not acceptable and the highways officer has made suggestions with regard to; main access, visibility splays, footways need widening to 1.8 metres, no bus service passes the site, the access road and passing of vehicles safely, road widening, footway provisions, insufficient manoeuvring space for the car parking spaces, cycle storage, parking spaces, garage sizes, permeable paving as a road construction or crate style soakaways for road surface water drainage

### Environment Management Officer

Require a condition to allow passive house standards be used for construction of all the dwellings.

### Landscape

The proposal will have a visual effect on the surrounding landscape and an impact on the existing rural edge character of Redgrave and the conservation area. The character of the village should remain as the ‘quality of place’. There is a lack of information with regard to landscape details such as boundary treatments should be shown, more details needed about accessibility and overall design, detailed landscape planting plan, landscape maintenance plan and specifications.

Appropriately detailed landscape and boundary plan will be required to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal.

---

## **B: Representations**

There have been a number of objection/comment representations received raising the following planning matters/concerns:

Unsuitable vehicle access close to corners  
Heavy/increase in traffic and lack of infrastructure/cumulative impacts  
Increase in population  
Impact on the character, landscape and openness  
Out of character  
Poor design and aesthetics  
Traffic issues and road safety  
Increase in traffic movements  
No safe access points  
Unsafe location on a bend  
Ecology impacts  
Tree impacts  
Surface water drainage  
Insufficient information to determine the application  
Narrow pavements  
Impact on conservation area  
Impact on protected species  
Impact on schools and health services  
Surface water drainage  
Lack of services and facilities to accommodate the development  
Unsuitable position  
Other applications within Redgrave

---

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

---

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

During this application process the case officer has changed. The consultation process has highlighted additional information is required with regard to ecology, archaeology, surface water drainage, arboricultural impact, highways, and landscape.

No additional information has been submitted or sought for any issues to be addressed. The proposal is of a significant scale for a Full application, which would be significant to address as part of this Full application process. But, importantly in assessing this case the Council does not support the principle of residential use of the site for the reasons highlighted within this report. Therefore, it is considered fair, reasonable and appropriate to proceed with a timely decision without delay in accordance with paragraph 190 of the NPPF.

The matters pertinent to this application are:

- Principle of development
- Design, layout, landscape, character (inc; trees and hedgerow) and heritage impacts

- Archaeology
- Surface water drainage and water management
- Residential amenity
- Highways
- Ecology
- Other matters
- Assessment of sustainable development

## 1. Principle of development

1.1 The site is located outside the defined settlement boundary of Redgrave although adjacent to it in accordance with the Inset proposal map 65 of the Mid-Suffolk Local Plan (1998). The Council acknowledges that it is unable to demonstrate a five year supply of deliverable housing land within the Mid-Suffolk district, as required by paragraph 47 of the National Planning Policy Framework (NPPF); currently the Mid-Suffolk land supply sits at 3.9 years in accordance with the AMR (2016-2017). Therefore, paragraph 14 and 49 of the NPPF apply and are invoked in the decision-making process, as the Supreme Court Judgement (Suffolk Coastal District Council (Appellant) v Hopkins Homes Ltd and another (Respondents) Richborough Estates Partnerships LLP and another (Respondents) v Cheshire East Borough Council (Appellant)) is relevant in confirming that a shortfall in housing land supply triggers the second part of paragraph 14 (NPPF). This means the proposal should be considered in the context of the presumption in favour of sustainable development, for the purposes of decision-making, granting planning permission unless the adverse effects of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF, taken as a whole. As such, this report focuses on a balanced assessment between any harms and any benefits of the proposal to conclude a sound recommendation.

1.2 It is also important to highlight the aforementioned judgement confirms that the narrow interpretation should be used in establishing whether a policy relates to the supply of housing. The narrow interpretation states: *limited to policies dealing only with the numbers and distribution of new housing, and excluding any other policies of the development plan dealing generally with the disposition or restriction of new development in the authority's area.* It is fair to say not all Mid-Suffolk's local housing policies should be considered out-of-date as they are not all specific to housing numbers and distribution. It is considered a matter of planning judgement for the decision-maker to have regard to the amount of weight attributed to such policies in their decision-making, and in this case the relevant Mid-Suffolk's local housing policies FC01, FC01.1, CS1, CS2 and FC2 have been given consideration in the first instance along with the relevance of paragraph 14 and 49 of the NPPF, with the absence of a full 5-year land supply.

## 2. Design, layout, landscape, character (inc; trees and hedgerow) and heritage impacts

2.1 This proposal seeks Full planning permission for the erection of 30 dwellings to the north east of Redgrave, which is a designated secondary village in accordance with Local Policy CS1. This means in terms of settlement hierarchy the Redgrave settlement sits considerably lower to other settlement such as primary villages, key service centres and towns within the Mid-Suffolk district as the level of services and facilities for day-to-day needs is much lower and often poor to accommodate for larger growth. Consequently, secondary villages such as Redgrave are often unsuitable for significant growth.

2.2 It is also noted as part of my site visit Redgrave has poor connectivity to other main settlements and this is due to its location in the wider geographical context as Redgrave sits away from main settlements, which is also due to Redgrave's rural isolated nature in the wider geographical context of location and settlement hierarchy consideration. It is clear to see the general pattern and form of existing development within Redgrave's settlement boundary is primarily diagonal linear form, which lends itself to its heritage



designations insofar as the settlement is within a designated conservation area with numerous listed buildings within the settlement. But equally when you look at Redgrave and its wider setting and context the special landscape area and flood plains surrounds its settlement, which adds to its unique rural setting and character and how the designated heritage assets are read in connection with this setting and character aspect.

2.3 The site is located in an area where boundaries to both movement and habitat connectivity exists. The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Ancient Plateau Claylands landscape character type. Key characteristics include flat or gently rolling arable landscape dissected by small river valleys, filed patterns of ancient enclosure, loosely clustered villages, scattered ancient woodland parcels and hedgerows with hedgerow trees. There is a large mature English Oak tree in the north/west corner of the site of particular merit. There is concern about the close proximity of development that could lead to adverse impact during construction and future pressure for pruning/removal.

2.4 In particular, where this proposal for 30 dwellings would be located (north/east of Redgrave) is in a location where the village built form significantly filters out in to openness and sporadic loose settlement form, from the more dense existing built form south of the Redgrave settlement, this proposal would significantly erode the character and setting of the conservation area and listed buildings within. The proposal will have a significant visual effect on the surrounding landscape and an impact on the existing rural edge character of Redgrave and the conservation area, which will also erode the unique quality of place, contrary to Local Plan Policies CL2, CL10, HB1, HB8, Suffolk Landscape Character Assessment and Section 66 (1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.5 The previous pre-application advice provided was subject to a comprehensive formal assessment and a formal consultation process being undertaken via a formal process. It very much appears all the details submitted with regard to this Full proposal appear rushed and poorly considered for the following reasons:

2.6 The proposed layout and design would see the new dwellings arranged around a circular formation, whereby main access is from the B1113 highway route (opposite Pound Farm property), which has no relation to the existing primarily diagonal linear form of the Redgrave settlement. It is clear to see existing properties immediately south east of the application site within the Redgrave settlement contain architectural and historic merit. The proposed dwellings as seen in the submitted elevation drawings are bland, contemporary and lack architectural character in such a sensitive location and setting, and it is difficult to see where reference or any meaningful inspiration and influence has been regarded to the wider historic settlement and existing property details. All of which leads me to conclude the proposal represents an incongruous and insular proposal significantly at odds with the existing pattern and form settlement, and wider character context significantly detracting from the architectural and historic value of the historic Redgrave settlement contrary to Local Plan Policies H13, H15, H16 and Section 7 of the NPPF (2012).

### 3. **Archaeology**

3.1 Paragraphs 128 and 129 of the NPPF place great importance on heritage assets. It is identified the site in question is in an area of high archaeological potential on the County Historic Environment Record, near the tumulus marked on the 1st edition OS map (1837-1840) (RGV 008) find spots of Saxon Cinerary Urns (RGV 005) and other Saxon artefacts (RGV 004). The Archaeological officer comments have identified there is high potential for ground heritage assets or archaeological importance within this area due to its historic relationship and wider setting and context meaning in relation to the Saxon times. As such, this proposal contains a lack of information with regard to archaeological evaluation of the site. I am not satisfied the proposal can adequately address Local Plan Policy HB14, HB15 and CL10.

#### **4. Surface water drainage and water management**

4.1 Paragraph 100 of the NPPF makes clear that inappropriate development in areas of flood risk should be avoided by directing development away from areas of high risk. Mid-Suffolk's Local Policy CS4 is in line with the requirements of the NPPF in terms of flood risk and therefore carries significant weight.

4.2 There is a holding objection in place from the SCC Flood and Water Officer, whilst a method for the disposal of surface water for the dwellings has been provided. No identification or design with regard to surface water drainage system for the road infrastructure and it needs to be understood how the surface water from the highway will be drained and the drainage assets maintained. The proposal needs to adequately satisfy Local Plan Policies SC4, SC5 and Section 10 of the NPPF (2012).

#### **5. Residential amenity**

5.1 One of the core planning principles is for proposals to seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings, even more so when in relation to archaeology, architectural and historic merit and wider setting impacts.

5.2 In general amenity terms it could be considered the proposed layout has provided acceptable separation distance between the proposed dwellings and surrounding dwellings. However, there are in some situations where proposed dwellings could overlook one another, such as some of the proposed affordable houses, flats and self-build properties, which is due to their location and orientation on the plot. But also, as highlighted earlier in the 'design, layout, landscape, character (including; trees and hedgerow) and heritage impacts' section of this report the proposal fails to prevent the loss of openness, which contributes to the character and appearance, public amenity benefit of the area and setting, which this proposal would erode contrary to Local Plan Policy H13 and H16.

#### **6. Highways**

6.1 Policy T10 of the Mid-Suffolk Local Plan requires Local Planning Authorities to consider a number of highway matters when determining planning applications, including; the provision of safe access, the safe and free flow of traffic and pedestrian safety, safe capacity of the road network and the provision of adequate parking and turning for vehicles. Policy T9 supplements policy T10, requiring proposals to provide areas of parking and manoeuvring in accordance with the parking standards adopted by the district. Paragraph 32 of the NPPF confirms that development should only be prevented or refused on transport grounds where the residential cumulative impacts or development are severe.

6.2 The proposal details are not acceptable and the highways officer has made suggestions with regard to; main access, visibility splays, footways need widening to 1.8 metres, no bus service passes the site, the access road and passing of vehicles safely, road widening, footway provisions, insufficient manoeuvring space for the car parking spaces, cycle storage, parking spaces, garage sizes, permeable paving as a road construction or crate style soakaways for road surface water drainage.

#### **7. Ecology**

7.1 Section 11, of the NPPF puts great emphasis on minimising impacts on biodiversity and ecology species. The proposal has received a holding objection, as the submitted ecology report does not examine what designated sites, protected species and priority species/habitat may be present and affected by the proposal. Consequently, there is insufficient ecological information for the determination of this application. The data search undertaken by the Place Services ecology services using the Suffolk Biodiversity Information Service (SBIS) identified records of bats, hedgehogs and swifts nearby to the

proposed development. Full regard and responsibility needs to be had to Circular 06/2005 (sections 98 and 99). The proposal does not comply with Local Plan Policies CL8, CL9 and CL10.

## **8. Other matters**

8.1 This proposal would trigger 35% affordable housing equating to 10 dwellings in total to be policy compliant.

8.2 The majority of the infrastructure requirements in this case would be required via CIL rather than through planning obligations, which will require provision of passenger transport, library facilities, provision of additional pre-school places at existing establishments, primary school places at existing schools, provision of secondary, sixth form and further education places and provision of waste infrastructure

8.3 Transportation matters would be dealt with via conditions and Section 106 as appropriate, and infrastructure delivery to adoptable standards via Section 38 and Section 278. Transport matters include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site).

8.4 The Environment Management Officer has recommended a condition to allow passive house standards be used for construction of all the dwellings, whilst I agree with achieving quality in decision making the policy does not require such standards and only encourages. Furthermore, the details of the scheme are not considered acceptable for the reasons in this report.

8.5 All third party comments have been considered and addressed as necessary within this report.

## **9. Assessment of Sustainable Development**

9.1 Paragraph 49 and 14 of the NPPF requires housing applications to be considered in the context of the presumption in favour of sustainable development.

9.2 The proposed development is not considered to represent a sustainable development, having due regard to the three tests (social, economic and environmental) set out in the NPPF, by virtue of negative impacts on the special rural countryside character and landscape, Impact on the architectural and historic value, potential harm to archaeological features, impacts to ecology, surface water drainage, arboricultural impact and highways details and matters, which outweighs the benefit of 30 additional dwellings outside the development boundary having acknowledged the material consideration in the lack of a five year land supply.

9.3 For this reason, the proposed development is contrary to the aims of the NPPF to secure sustainable development, acknowledging the advice in paragraph 49. The proposed development would have significant and demonstrable adverse impact on the social, economic and environmental considerations contrary to paragraph 14 of the NPPF.

---

## PART FOUR – CONCLUSION

---

### 10. Conclusion

10.1 It is considered some of the issues in this case could perhaps be overcome, with regard to **ecology, surface water drainage, arboricultural impact and highways**, subject to additional information being provided and considered acceptable. However, the matters in relation to special landscape, character, architectural and historic value are not considered acceptable as these specific matters are intrinsic to the location and setting of the site in question and must be protected for its own sake to ensure the 'quality of place' remains in perpetuity in accordance with Local and National policy highlighted within this report.

### Reasons for refusal

#### 1. Harm to the special landscape and character

The proposal would create an insular and incongruous development which would result in the loss of an important open space and special landscape area setting within the existing rural landscape, significantly impacting and eroding the unique landscape, character and quality of place, contrary to Local Plan Policies CL2, CL10, H13, H15, Suffolk Landscape Character Assessment and Sections 7 and 11 of the NPPF.

#### 2. Impact on the architectural and historic value

The proposal would significantly and demonstrably harm the historic and architectural merit and setting of the conservation area, which includes the setting of the grade II\* listed buildings within the conservation area. The proposal would significantly erode the unique wider setting and context that surrounds the Redgrave settlement, which adds to its unique rural setting and character and how the designated heritage assets of the conservation area are read in connection with this setting and character aspect. This would be contrary to Local Plan policies HB1, HB8. The proposal would harm public amenity benefit creating unacceptable impact on the open spacious backdrop of the conservation area, which contributes to the setting of the conservation area and listed buildings within. This would be contrary to Local Plan policy H16 and Section 66(1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve historic buildings and their setting or any features of special architectural or historic interest which it possesses, which is also reinforced by Section 12 of the NPPF in that heritage and conservation assets are irreplaceable resource and conservation in a manner appropriate to historic significance.

#### 3. Harm to archaeological features

The site is located in an area of high archaeological potential on the County Historic Environment Record, near the tumulus marked on the 1st edition OS map (1837-1840) (RGV 008) find spots of Saxon Cinerary Urns (RGV 005) and other Saxon artefacts (RGV 004). It is unknown whether the application site contains the presence or absence of archaeological importance due to the lack of information. However, on the balance of probability the proposal is considered likely to have unacceptable impact on the significance of any heritage asset through the destruction of any earthworks, and harm to the setting of any earthworks. The application therefore conflicts with Local Plan Policies HB14, HB15 and CL10 and section 12, paragraphs 126, 135 and 139 of the NPPF (2012).

#### 4. Unsustainable development/ harm outweighs benefits

The adverse impact on the special character, landscape and appearance of the area and the historic, architectural and high potential archaeological value of the site would constitute significant and demonstrable harm, which outweighs the benefits of the development when assessed in light of the

National Planning Policy Framework including paragraphs 14 and 49. The proposal would not constitute sustainable development due to the environmental harm that would be caused as identified above.

5. Insufficient information

The application has failed to provide sufficient information with regard to **ecology** (protected species and priority species/habitat that may be present and affected by the proposal), **surface water drainage** (no identification or design with regard to surface water drainage system for the road infrastructure and how the surface water from the highway will be drained and maintained), **arboricultural impact** (detailed assessment on the impact of the proposal on the large mature English Oak tree north/west of the site), **highways** (proposal details are not acceptable). Consequently, the Council is not satisfied that the proposal satisfies the requirements of Local Plan Policies CL8, CL9, CL10, Circular 06/2005, T9, T10, SC4, SC5, HB14, HB15, CL10 as a result of the lack of information, with regard to ecology, surface water drainage, arboricultural impact and highways.