

WORKING PAPER 1

Development Control Committee
7 July 2021

**Planning Application DC/21/0110/RM –
Land NW of Haverhill, Ann Suckling Road, Little
Wratting**

Date registered:	16 February 2021	Expiry date:	09 July 2021
Case officer:	Penny Mills	Recommendation:	Approve application
Parish:	Haverhill Town Council	Ward:	Haverhill North

Proposal: Reserved matters application - submission of details under outline planning permission SE/09/1283 - the means of access, appearance, landscaping, layout and scale for the construction of 127 dwellings, together with associated private amenity space, means of enclosure, car parking, vehicle and access arrangements together with proposed areas of landscaping and areas of open space for a phase of residential development known as phase 2b as amended by plans received 14.5.21 increasing number of units to 129 and amendments to access, layout, scale, appearance and landscaping as summarised in covering letter dated 14.5.21

Site: Land NW Of Haverhill, Anne Suckling Road, Little Wrating

Applicant: Mr Stuart McAdam - Persimmon Homes (Suffolk)

Synopsis:

Application under the Town and Country Planning Act 1990 and the (Listed Building and Conservation Areas) Act 1990 and associated matters.

Recommendation:

It is recommended that the Committee resolve to approve the application subject to the conditions.

CONTACT CASE OFFICER:

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Background:

This application has been referred to the Development Control Committee following a call-in from the local Ward Member (Councillor Joe Mason of Haverhill North). Haverhill Town Council object to the application.

The application is part of the wider north west Haverhill site, which is one of the two strategic growth sites for Haverhill identified in the adopted Core Strategy. It seeks approval of the details for part of the second phase of residential development.

The site has previously been the subject of significant public engagement through the preparation and adoption of a concept statement and a masterplan. Outline planning permission was granted on 27 March 2015 for residential development, a primary school, local centre including retail and community uses, public open space, landscaping infrastructure, servicing and other associated works alongside full permission for the construction of a relief road.

Phase two of this strategic site falls within two broad character areas defined in the approved Design Code: Wratting Gardens to the north, which is the character area for phase 1 and Boyton Place to the south, which incorporates the local centre and is envisaged as being more contemporary in appearance.

This southern part of phase 2 known as phase 2b was initially submitted with the northern parcel in planning application DC/16/0215/RM. However, it was withdrawn from that application to enable further work to take place to improve its character, layout and appearance.

Further changes have been made during the course of the application and additional information has been provided. Some consultee comments are to be finalised following consultation of the most recent plans. The committee will be updated on these responses.

1.0 Proposal:

- 1.1 The application seeks approval for the reserved matters (access, appearance, landscaping, layout and scale), for phase 2b of NW Haverhill, the outline approval granted under SE/09/1283.
- 1.2 The revised reserved matters application provides the details for 129 dwellings with associated private amenity space, means of enclosure, car parking, vehicle and access arrangement and drainage, together with proposed areas of landscaping.

2.0 Application supporting material:

Drawing / document title	Drawing/document number	Received
Design and layout		
Location plan	001 rev A	14.05.2021

Planning layout	002 rev G	23.06.2021
Massing Plan	003 rev P0	14.05.2021
Refuse and cycle plan	004 rev P0	14.05.2021
Boundary treatments	005 rev P0	14.05.2021
Materials Plan	006 rev P0	14.05.2021
Parking plan	007 rev P1	24.06.2021
Tenure plan	008 rev P0	14.05.2021
Character areas plan	009 rev P0	14.05.2021
Street scenes A-D	20-3072-010 rev D	23.06.2021
Street scenes E-f	077 rev A	21.06.2021
House types		
Alnmouth Floor Plans	020 rev P0	14.05.2021
Alnmouth Elevations - The Mews	021 rev P0	14.05.2021
Arden Elevations - The Mews	023 rev P0	14.05.2021
Arden Elevations - The Avenue	023 rev P0	14.05.2021
Belmont Elevations - Urban Square	026 rev P1	21.06.2021
Charnwood Floor Plans & Elevations - Urban Square	027 rev P0	14.05.2021
Charnwood Floor Plans & Elevations - The Avenue	028 rev P0	14.05.2021
Charnwood Floor Plans & Elevations - Rural Green Edge	029 rev P0	14.05.2021
Dallington Floor Plans	033 rev P0	14.05.2021
Dallington Elevations - Neighbourhood Square	034 rev P0	14.05.2021
Dallington Elevations - Urban Square	035 rev P0	14.05.2021
Danbury Floor Plans	036 rev P0	14.05.2021
Danbury Elevations - The Mews	037 rev P0	14.05.2021
Danbury Elevations - Urban Square	038 rev P0	14.05.2021
Epping Floor Plans	039 rev P0	14.05.2021
Epping Elevations - The Avenue	040 rev P0	14.05.2021
Epping Elevations - Urban Square	041 rev P0	14.05.2021
FOG V1 Floor Plans & Elevations - The Avenue	042 rev P1	21.06.2021
FOG V2 Floor Plans & Elevations - The Avenue	042.1 rev P1	21.06.2021
FOG V3 Floor Plans & Elevations - The Avenue	042.2 rev P1	21.06.2021
FOG V3.1 Floor Plans & Elevations - The Avenue	042.3 rev P1	21.06.2021
FOG V4 Floor Plans & Elevations - The Avenue	043 rev P1	21.06.2021
FOG V5 - Plots 119-120 - Floor Plans - Neighbourhood Square	044 rev P1	21.06.2021
FOG V5 - Plots 119-120 - Elevations - Neighbourhood Square	044 rev P1	21.06.2021
Greenwood Floor Plans & Elevations - Rural Green Edge	046 rev P0	14.05.2021
Grizedale Floor Plans	047 rev P0	14.05.2021

Grizedale Elevations - Neighbourhood Square	048 rev P0	14.05.2021
Heatwood Elevations - Rural Green Edge	050 rev P0	14.05.2021
Marston Floor Plans	051 rev P0	14.05.2021
Marston Elevations - Rural Green Edge	052 rev P0	14.05.2021
Saunton Floor Plans	053 rev P0	14.05.2021
Saunton Elevations - Rural Green Edge	054 rev P0	14.05.2021
Saunton Elevations - The Avenue	055 rev P0	14.05.2021
Sherwood Floor Plans	056 rev P0	14.05.2021
Sherwood Elevations - Rural Green Edge	057 rev P0	14.05.2021
Sherwood Elevations - The Avenue	058 rev P0	14.05.2021
Sherwood Elevations - Urban Square	059 rev P0	14.05.2021
Sherwood Corner Floor Plans	060 rev P0	14.05.2021
Sherwood Corner Elevations - Urban Square	061 rev P0	14.05.2021
Wareham Floor Plans	062 rev P0	14.05.2021
Wareham Elevations - Neighbourhood Square	063 rev P0	14.05.2021
Wareham Elevations - Urban Square	064 rev P0	14.05.2021
Wareham Elevations - The Avenue	065 rev P0	14.05.2021
Whiteleaf Floor Plans & Elevations - The Avenue	066 rev P0	14.05.2021
Whiteleaf Weatherboard Floor Plans & Elevations - Rural Green Edge	067 rev P0	14.05.2021
Brantham Floor Plans & Elevations - Neighbourhood Square	068 rev P0	14.05.2021
Flat Block 1 – Floor Plans	069 rev P0	14.05.2021
Flat Block 1 - Elevations	070 rev P1	21.06.2021
Flat Block 2 - Floor Plans	071 rev P0	14.05.2021
Flat Block 2 – Elevations	072 rev P1	21.03.2021
Single garage	073 rev P0	14.05.2021
Double garage	074 rev P0	14.05.2021
Landscape, ecology and drainage		
Detailed soft landscaping	JBA 18-351-40 rev D	22.06.2021
Detailed soft landscaping	JBA 18-351-41 rev D	22.06.2021
Detailed soft landscaping	JBA 18-351-42 rev D	22.06.2021
Detailed soft landscaping	JBA 18-351-43 rev D	22.06.2021
Ecological Constraints Plan	JBA-18-351-ECO12b rev B	22.06.2021
Ecological Enhancement Strategy	JBA-18-351-ECO14 rev A	22.06.2021
Manhole Schedules	E3838/555/A	June 2021
Drainage Construction Details	E3838/560	April 2021
Drainage Strategy	E3838-Haverhill-Drainage Strategy-Rev 3	July 2020
Pond 1 Layout & Sections	E4062/520/A	April 2021

Headwall & Flow Control Details	E4062/561/A	March 2021
Adoptable Drainage Easements Plan	045-E-SK100	May 2021

3.0 Site details:

- 3.1 The site comprises part of the northern section of the wider strategic site identified by Policy HV3 of the Haverhill Vision 2031, granted outline approval under SE/09/1283.
- 3.2 The site, which is known as parcel 2b covers 2.93 hectares between Ann Suckling Road to the south and the proposed main vehicle route through the development to the north. The site is former agricultural land which rises to the north where it meets an existing hedgerow, part of which was previously removed to facilitate the development of the new road running through the strategic site.
- 3.3 To the south of the site there is existing residential development along Ann Suckling Road. The site is bounded to the east and west by existing hedgerows and ditches. Further to the west is the rest of the development site, which is currently undeveloped, former agricultural land. To the east there is a mix of existing development including the listed Chapel Farm Cottage and new development to the rear of Boyton Hall which is currently under construction.
- 3.4 There are no public rights of way within the site although the field edges are used as informal recreational and dog walking routes by local residents.

4.0 Relevant Planning history:

Reference	Proposal	Decision
SE/09/1283	1. Planning Application - (i) construction of relief road and associated works (ii) landscape buffer 2. Outline Planning Application - (i) residential development (ii) primary school (iii) local centre including retail and community uses (iv) public open space (v) landscaping (vi) infrastructure, servicing and other associated works as supported by additional information and plans received 27th September 2010 relating to landscape and open space, flood risk, environmental statement, drainage, layout, ecology, waste, renewable energy and transport issues including treatment of public footpaths and bridle paths.	Approved
DC/16/2836/RM	Reserved Matters Application - Means for Landscaping (replacement hedge) for phase one of the development previously approved under	Approved

	DC/16/2836/RM Submission of details under SE/09/1283/OUT - the means of landscaping (replacement hedge) for the construction of (i) residential development (ii) primary school (iii) local centre including retail and community uses (iv) public open space (v) landscaping (vi) infrastructure, servicing and other associated works	
DCON(H)/09/1283/RM	Application to Discharge Conditions A2 (Alignment), A4 (Arboricultural Method Statement), A5 (Soft Landscaping) , A6 (Landscape and Ecological Management Plan), A8 (Archaeology) and A9 (Excavation and Ground Levels) of SE/09/1283	Pending consideration
DC/20/0614/RM	Reserved Matters Application - Submission of details under SE/09/1283 for the infrastructure for Phases 2-6, Comprising of the Internal Estate Roads, Drainage, POS, Landscaping, Sports Pitches and Allotments	Pending consideration
DC/21/0615/RMA	Reserved Matters Application - Submission of details under SE/09/1283 - the means of access, appearance, landscaping, layout and scale for the construction of 41 dwellings with associated private amenity space, means of enclosure, car parking, vehicle and access arrangement and drainage together with proposed areas of landscaping and areas of open space for a residential development known as Phase 2A	Approved

5.0 Consultations:

5.1 The application has been subject to amendments and additional information has been submitted during the application to address concerns raised. The consultation responses set out below represent the current position and are a summary of the latest responses received.

5.2 Full copies of consultation responses are available to view online through the Council's public access system using the link below.
Representations:

<https://planning.westsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=QN8CNOPD07800>

5.3 Suffolk County Council is abbreviated to SCC in the consultation responses set out below.

5.4 **SCC Highways – No objection from highways to the amended proposals. There are some outstanding concerns which they advise are not sufficient to warrant refusal on highways grounds.**

Comments made summarised below:

- Reliance on private drives on the periphery of the development for visitor spaces with lack of provision in the central areas. Concern that if the visitor spaces on private drives were covenanted to dwellings it may make them difficult to ensure availability.
- The poor distribution of visitor spaces could lead to obstructive parking on the street or footway. Therefore, recommend a kerbing and on street parking condition.
- Do not recommend covered parking arrangements as it can lead to storage.
- Note no details of electric vehicle charging provided.
- Issues noted in relation to section 38 adoption plan.
- Visibility splays shown are acceptable.
- Recommend all traffic calming build-outs have trees whether designed with low walls or flush to the carriageway. Specialist engineering tree solutions will be required for trees within 2.5 metres of the highway.
- Specific bin presentation points recommended for plots rather than on driveways.
- Communal cycle store details required. Information is needed on the racking and layout.
- We note that there are numerous locations where three utilities are proposed in the 1.0m service strips of the shared surface roads. We advise that there is often insufficient space for 3 services and streetlights. The applicant has not yet proposed any locations for streetlights but we advise that street lights with cabling/ducting should be shown on the utilities drawing.

5.5 **Anglian Water** – confirmed no comments to make

5.6 **SCC Lead Local Flood Authority:** Following a review of all the submitted documents approval recommended.
Informative recommended to be attached to any decision.

5.7 **West Suffolk Public Health and Housing** – no objection. Comments summarised below:

- Concerns raised over bedroom sizes in some properties.
- Noise mitigation measures previously proposed for the residential properties to the southern boundary of the Phase 2A would be sufficient and a further noise assessment relating specifically to Phase 2B is not considered necessary.

- Conditions recommended to secure the appropriate noise mitigation measures.

5.8 **West Suffolk Environment Officer** – Confirmed no comments

5.9 **West Suffolk Strategic Housing** - Strategic Housing are in support of this application and the following affordable housing mix which is proposed:

Rented

- 2 x 1 bed bungalow
- 11 x 1 bed flat
- 8 x 2 bed house
- 1 x 2 bed FOG
- 2 x 3 bed bungalow M4 (3)
- 3 x 4 bed house
- 1 x 5 bed house

Shared ownership

- 3 x 2 bed FOG
- 5 x 2 bed house
- 3 x 3 bed house

- One outstanding issue with the room sizes in the Belmont house type; bedroom 5 needs to be bigger for this unit to be occupied to maximum capacity.

** The applicant has subsequently submitted a revised floorplan for this dwelling with an amended internal arrangement making bedroom 5 larger. The strategic Housing Officer has confirmed that this is acceptable.*****

5.10 **Natural England** – confirmed no comments

5.11 **Suffolk Wildlife Trust** – holding objection (awaiting further comments)

- Concerned not sufficient buffer around the hedgerows on the site.
- Note sections of hedgerow removed and whilst buffering is shown it does not appear to be 4 metres.
- If removal of sections of hedgerow are required to facilitate the development then recommend a detailed method statement produced for the translocation of Sulphur Clover to a nearby receptor site.
- Potential impact on bats from external lighting – dark corridors to be retained around the site. Lighting strategy required.
- Measurable net gain in biodiversity required. Biodiversity enhancement strategy should be produced detailing the how the enhancements and recommendations made within the Ecological Constraints Plan are to be incorporated within the development, including their locations.

5.12 **West Suffolk Landscape and Ecology Officer** – comments summarised below.

Further comments in response to the additional and amended information are awaited. Members will be updated on these.

- Infrastructure application has not been agreed and is not currently fit for purpose. Recommended that the details of the sports field and play space are included in this RM so that they can be approved and subsequently provided in accordance with the phasing plan.
- Approved basin is in the green infrastructure area. A 3m easement needs to be shown. An access route from the southwest of the site around the SUDs feature to the green corridor and footpath network and to link with Ann Suckling Road would be an advantage.
- The development is immediately adjacent to the western POS known as the Central Linear Park. No room has been retained to provide a landscaped edge to the development such that the impact of the development is softened and screened to maintain the amenity of the new green corridor.
- Corridors shown to be used by commuting and foraging bats are required to be retained as a dark. It is recommended that the development is pulled back from this boundary and that a landscaping scheme which includes hedges, shrub planting, trees and bulbs is designed to provide an attractive boundary and buffer.
- No Arboricultural Impact Assessment, Arboricultural Method Statement or Tree Protection Plan has been submitted to support this application.
- Any hedgerow removal should be compensated through new planting and the plans should clearly show this.
- Eastern boundary - The planting on the eastern boundary of the site must be retained and further consideration should be given to how this boundary planting can be strengthened through complementary planting.
- The proximity of the turning head at 85/96 to the eastern green corridor path should also be adjusted to allow additional planting as an additional barrier, including to light.
- Allotment boundary - Please confirm the amount of space retained for the allotments. Is it consistent with the requirements in the outline?
- Levels - It would be useful to have plans that show the levels for this site to demonstrate that there is enough clearance between the development and the features that are to be retained.
- Remove all amenity grass in POS areas including adjacent to the eastern path – floral lawn could be used here as this type of grass can be mown when required. Alternatively, a grass mix specific to clay soils could be used.
- Small verge areas should be planted rather than grass to avoid the maintenance liability associated with mowing

- Trees should not overhang private car parking places
- The amenity afforded by the central green space is lost because it is surrounded and masked by car park spaces. The relationship between properties at plots 77-79 is too close. The front gardens of these properties should be deepened and separated from the POS by a path. A knee rail should also define the boundary of the property.
- Additional shrub planting in the green space would help to soften the impact of car parking on the edges. Bulbs would also add another layer of interest
- All hedges in POS to be mixed native. Blackthorn is to be used sparingly where it has room to sucker without causing damage.
- Consideration should be given to reduced use of thorny species close to PRow and cycle/ footpaths
- All trees to be at least 2.5m from highway infrastructure (including footways) and where less than 5m, a root-barrier should be used. Trees to be at least 5m from lighting columns. Hedges to be set back from the highway and from footways. Space should be retained to allow for maintenance of hedges.
- The replacement hedge for the section of G43 to the west of the entrance to be triple staggered row and to be planted on the alignment of the removed hedge. Grass seed mix below should be a hedgerow mix. Trees to be native trees. The objective is to replace what was lost.
- Hedgehog links should be shown. The linkages should be designed by an ecologist so they correspond to garden areas most likely to support hedgehogs.
- The LEMP should cover all areas to be managed – ie excluding private garden areas and include a plan of those areas illustrating the prescriptions to be applied.
- Reptiles – If the application is granted permission the Reptile Precautionary Method Strategy of site clearance should be implemented in full. Enhancements for reptiles are recommended in the report.
- GCN – The report recommends that enhancements to improve the site for GCN.
- Badgers –Based on the report previously submitted (dated October 2019) badger survey should be repeated prior to on-site construction.
- Breeding birds –Enhancements for breeding birds are recommended in the report.
- Bat activity report – Figure 3 in the report highlight the boundaries of this site are important for commuting and foraging bats. The report is

clear that mitigation and compensation will be required to reduce the impacts of bat commuting routes becoming fragmented.

- Ecological constraints Plan Phases 2-6 and relief road – This report is out of date as it does not include information from a number of reports including the bat activity and wintering bird surveys. The report is also generic and does not tie down exactly where the measures are to be delivered. There is therefore a danger that the enhancement measures that cannot be retrofitted will not be delivered.
- The report recommends the retention of hedge H2 (G43 in the arb survey) with a 4m buffer and a sensitive lighting scheme. The proposals clearly require the removal of part of this hedgerow, and part of it already appears to have been removed.
- This is clearly contrary to the recommendations in this report, and the ES requires that loss of hedgerow should be minimised. Whilst part of the hedge may be required to facilitate access to the plot, this does not negate the need to mitigate the loss.
- No mitigation has been offered. It is recommended that a mitigation/compensation strategy specifically for the loss of this hedge is submitted. The strategy should also consider the Sulphur clover at the eastern extent of this hedge.
- The report recommends a number of ecological enhancement measures. There are no details of where these measures are to be secured in this application.

5.13 **Design Out Crime** (initial consultation only, no comments received for consultation on amended plans) – set out a number of areas of concern to be addressed to reduce opportunity for crime and make the development a safe, secure and desirable development to live in. Comments summarised below:

- Significant number of rear parking areas which is not recommended due to lack of surveillance and allowing for the opportunity of ASB or easy access to rear gardens. The FOG's positioned in these areas may provide a little surveillance into some of the area by residents when they are at home but their design could create other issues such as reducing surveillance to rear gardens.
- The access points in and out of the rear parking areas, could create Vehicle ASB with motorbikes, scooters and cycles racing through them and also gives offenders various options of exiting quickly. Police do not recommend this layout design.
- The majority of parking throughout the site assigned is "allocated parking" with very few garages on site. Dwellings should be designed with more in curtilage parking or garages.
- Visitor parking areas should be clearly defined with marked line marking, as "visitors" parking areas.

- More dwellings should have active gable end windows to increase surveillance.
- Car ports are not recommended as they do not provide secure storage for vehicles or property.
- For the allotments advise 1.8 m welded mesh fencing as it is anti-climb and vandal proof. Guidance given on security and management of the allotments.
- Some of the designs don't provide good visibility to the neighbouring dwellings door ways, which reduces surveillance to them. Front doors should be flush and in line with the building in order to provide good natural surveillance to the front door.
- Apartments will need access control and consideration for compartmentalisation to ensure that only residents can access their areas and that non-residents cannot access the building at all. This reduces the risk of burglary, cold calling and mis-use of drugs activity or rough sleeping in communal hallways. External mail facilities are required so that there is no need for postal access to individual flats and installation of smart meters for easy meter readings
- The balcony areas should not lead themselves to act as climbing aides onto each other.
- It is recommended that rear car parking areas that have garden fencing should be installed with 1.5 m close board with 300mm trellis topping to reduce the opportunity to climb over easily and offer more surveillance into the area.
- There are areas that have narrow rear access paths; fencing in these areas should also be 1.5 m close board with 300mm trellis topping. Defensive planting should also be positioned around walled areas.

5.14 **West Suffolk Urban Design Officer** – comments summarised below:

- Concerns raised regarding the scale, bulk and massing of the 3.5 storey flats particularly their relationship and proportions compared to adjoining buildings.
- Improvements noted to the streets and spaces in terms of hierarchy of spaces, greening of streets and less car dominance.
- Improvements to parking courts noted through breaking down into smaller spaces, introducing more flats over garages.
- Improved connectivity noted.

5.15 **SCC Planning Contributions Officer** – noted that the planning obligations previously secured under the first planning permission must be retained in respect of this application if West Suffolk Council make a resolution to approve.

6.0 Representations

6.1 **Ward Member Councillor Joe Mason** – comments copied below:

These revised plans show some attempt by Persimmon to address some concerns regarding previous submissions. However, there are a number of issues with these that I feel must be addressed.

Firstly, The urban design concept for this plot remains inappropriate. The quantity of properties planned has led to an overcrowded plot. The scope for having a density of 55 dwellings per hectare as currently planned, might be within permissible range but it is clear that the density of this site does not support the necessary parking infrastructure that an urban development would normally have access to, such as a car park or off street parking.

There is significant over-crowding of the site. Other developments in Haverhill have shown that a lack of visitor parking close to properties leads to kerb parking. These roads will not support this parking behaviour. These plans are highly likely to again result in congested roads/thoroughfares, where visitors will choose not use designated spaces due to the poor placement and proximity to the homes they will be visiting.

This desire to increase density to the upper margins by adding an additional 2 properties to previous plans further emphasises the lack of designed in consideration for the future well-being of the new community that will populate this plot.

It is essential that new developments are conducive to supporting the well-being of residents. These congested plans likely to cause difficulties, frustrations and possibly conflict for residents, regarding bins as well as the aforementioned parking.

Secondly, the Gateway design remains incongruous to the site as a whole. The 3 ½ storey concept, whilst offering less frontage at street level, continues to be overly excessive in its scope and over bearing in its nature. The 3 Storey design presented in the comments by the Urban Design team, fig 2, presents a far more agreeable approach to resolving the design of this part of the site, yet still adequately presents the Gateway concept.

The solution to this overcrowding must also not result in adding more 3 & 4 storey buildings to create more space. This site, with the high density will create a community that will both look & feel over crowded.

Plans for this plot must clearly demonstrate how this community will function once inhabited. If parking and bin placement cannot be resolved then plans should be submitted where there is a reduction in density that can still fall within the range permissible. These plans should try to avoid creating issues for residents by considering how this community will function once inhabited.

I remain concerned that the close proximity of the 2 ½ storey building to the listed Chapel Farm Cottages will negatively impact on these historic buildings and the space these 'Character' properties need that make them so valued.

As there is no off street parking for most houses. Plans must also show a

commitment to electric charging points for residents to access, and in doing so future proofing how this community will function when more electric vehicles will be on the site.

Car ports under FOGs must ensure the internal space allows residents to park and adequately exit their vehicle.

On a minor point, I request that some seating/bench and a bin is provided for the central shared green space, central to the plot so that facility can be added to the amenity, offering a place/point of rest for residents who might need it.

6.2 **Haverhill Town Council** – consultation response 09.06.21. Comments copied below:

The Council objected this proposal, the explanations for the objection are:

- **Urban Design:**
Councillors were interested to see the visualisations from Anne Suckling looking north, also on how the buildings on the SE corner and how it impacts Chapel Farm, under the current development plan. It was proposed that 3 story flats, not 3.5 story would be more suitable for the area.
- **Management objections:**
Access Problems at bin collection points. Distance in dragging to collection points, in some cases 70 to 100 metres. Dropped kerbs in getting to and at collection points
- **Highways:**
Not enough visitor parking spaces, no direct pedestrian connection to the middle of the development, this will lead to obstruction on the streets and footways. They recommend kerbing (such as 'Dutch' entrance kerb system) highlighting visitor parking. Recommend electric car chargers in covered areas. Recommend wider roads.
- **Environmental Health and Housing comments:**
The PHH report from March 2021 has concerns about room sizes and these do not appear to have been obviously addressed. Arden house type has a floor area below 9.5 sqm, only suitable as a single bedroom. Same in Bed 2 in Epping house type and bedroom 3 is floor area is under 6.5 sqm and only suitable for a child under 10, the same with bedroom 3 in bungalow A88B. Alnmouth house type bedroom 2 has less than floor area than 9.5sqm and only suitable for a single bedroom. All double bedrooms within the Corby apartments, all have floor areas less than 9.5sqm. A noise survey was last issued in 2017.
- The Town Council comments also reproduced comments from residents on Rowell Close and Falklands Road which are set out below:
 - Height and density of the development
 - Streets too narrow and not enough parking spaces.
 - Lack of Green Space, allotments are not public spaces, they are private rented areas.
 - With an extra two units this 2B phase is overdeveloped.
 - Room space in some below minimum standards.

- Request for additional information to be included in revised plans such as 3D illustrations on the views of the 3.5 Story building from Ann Suckling Road.
- Persimmon Homes are going against the Councils 2.5 story design code.
- No electric chargers in rear parking areas.
- The development does not include a clear infrastructure plan to support the development.
- Lack of community facilities planned within the development.

6.3 Public representations

112 nearby addresses were notified and a site notice was posted. 23 representations received from the following addresses:

- Chapel Farm Cottage
- The Willows
- 18 Boyton Close
- 4 Chase Close
- 1 Falklands Road
- 4 Falklands Road
- 6 Falklands Road
- 7 Falklands Road
- 24 Falklands Road
- 39 Falklands Road
- 46 Falklands Road
- 49 Falklands Road
- 9 Ganwick Close
- 3 Gurlings Close
- 12 Gurlings Close
- 21 Gurlings Close
- 12 Paske Avenue
- 1 Rowell Close
- 10 Rowell Close

The points raised are summarised below. Full copies of the representations are available to view on the public planning file online.

<https://planning.westsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=QN8CNOPD07800>

Scale and extent of development

- Extent of development would be closer to Ann Suckling Road and the siting, scale, height and massing would result in a dominant form.
- Concrete jungle.
- Height is not in keeping.
- Density is too high.
- Flexibility should be applied in using earlier density targets.
- View through site from Ann Suckling Road is required.
- Area for allotments appears to be reduced.

Visual amenity and design

- Design is out of character
- Using flats as a gateway does not make sense, use trees or a grassy area.

- Flats will dominate the landscape as they are on higher ground.
- Council not previously supportive of 4 storey so why now?
- Lack of transition with surrounding development.
- Victorian theme not reflected.
- Victorian theme is retrograde step.
- Style of the flats is not in keeping with the area. It is more urban than rural.
- Visual impact of a flat roof building will be very bulky on the skyline.
- No landscaping or recreational areas for the flats.

Residential amenity

- Overshadow and overlook existing development.
- Impact from noise and disturbance.
- No communal area or play area for children.
- No recreational areas.
- House sizes are too small.
- When will the recreational areas be built.
- Noise impact for properties to the east as private drives now located here rather than backs of properties.

Landscape, ecology and drainage

- Impacts on wildlife.
- Foundations will affect drainage and cause flooding.
- Can there be communal orchard as well as allotments.
- Concern that the ditch will not be maintained.
- No additional hedging or planting on the eastern boundary.
- Lack of functional green space.

Highways and access

- Increased traffic towards Cambridge.
- Something to stop cyclists going straight onto Ann Suckling Road is needed.
- The path on the eastern edge should be wider for cycle and pedestrians.
- Impacts on footpaths which have disappeared.
- Impact on turning into Ann Suckling Road – it will be more hazardous.
- Concern allotment parking will be used by others.
- Walks fenced off including rights of way.
- Inadequate parking provision shared surfaces for pedestrian and cars is unsafe.
- Ann Suckling Road will become a rat run.
- Ann Suckling Road should be weight restricted.
- Where is the provision for electric vehicle charging?
- Parking should be next to dwellings.
- Streets are too narrow.

Other

- When will the school be delivered?
- Why are the playing fields so far away – why can't they be positioned so existing community can enjoy them as well?
- Impact on cost of existing dwellings.
- Loss of farmland.
- Allotment access should be from the development side.
- Impact on existing infrastructure without bringing employment. There are not sufficient amenities here.
- Utilities already stretched.
- Affordable housing concentrated in clumps.
- Water pressure issues.

- Channel the length of the bypass has broken drainage pipes

7.0 **Policy:** On 1 April 2019 Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single authority, West Suffolk Council. The development plans for the previous local planning authorities were carried forward to the new Council by regulation. The development plans remain in place for the new West Suffolk Council and, with the exception of the Joint Development Management Policies Document (which had been adopted by both councils), set out policies for defined geographical areas within the new authority. It is therefore necessary to determine this application with reference to policies set out in the plans produced by the now dissolved St Edmundsbury Borough Council.

The following policies of the Joint Development Management Policies Document and the St Edmundsbury Core Strategy 2010 & Vision 2031 have been taken into account in the consideration of this application:

St Edmundsbury Core Strategy 2010

- Core Strategy Policy CS1 - St Edmundsbury Spatial Strategy
- Core Strategy Policy CS2 - Sustainable Development
- Core Strategy Policy CS3 - Design and Local Distinctiveness
- Core Strategy Policy CS7 - Sustainable Transport
- Core Strategy Policy CS12 - Haverhill Strategic Growth

Haverhill Vision 2031

- Vision Policy HV1 - Presumption in Favour of Sustainable Development
- Vision Policy HV3 - Strategic Site - North-West Haverhill

Joint Development Management Policies Document 2015

- Policy DM1 Presumption in Favour of Sustainable Development
- Policy DM2 Creating Places Development Principles and Local Distinctiveness
- Policy DM3 Masterplans
- Policy DM6 Flooding and Sustainable Drainage
- Policy DM7 Sustainable Design and Construction
- Policy DM11 Protected Species
- Policy DM12 Mitigation, Enhancement, Management and Monitoring of Biodiversity
- Policy DM13 Landscape Features
- Policy DM14 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
- Policy DM20 Archaeology
- Policy DM22 Residential Design
- Policy DM44 Rights of Way
- Policy DM46 Parking Standards

Other planning policy:

National Planning Policy Framework (NPPF)

The NPPF was revised in February 2019 and is a material consideration in decision making from the day of its publication. Paragraph 213 is clear however, that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the revised NPPF. Due weight should be given to them according to their degree of consistency with the Framework; the closer the policies in the plan to the

policies in the Framework; the greater weight that may be given. The policies set out within the Joint Development Management Policies have been assessed in detail and are considered sufficiently aligned with the provision of the 2019 NPPF that full weight can be attached to them in the decision making process.

8.0 **Officer comment:**

8.1 This section of the report begins with a summary of the main legal and legislative requirements before entering into a discussion about whether the development proposed by this planning application can be considered acceptable in principle in the light of national planning policy, local plan designations and other local planning policies. It then goes on to analyse other relevant material planning considerations (including site specific considerations) before reaching conclusions on the suitability of the proposals.

Planning and Compulsory Purchase Act 2004 (as amended)

8.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The principle of development in relation to the development plan and the conformity of the proposals with key policies is discussed through the rest of this report.

The Conservation of Habitats and Species Regulations 2010

8.3 The local planning authority, as the competent authority, is responsible for the Habitats Regulation Assessment (HRA) as required by Regulation 61 of The Conservation of Habitats and Species Regulations 2010 (as amended).

8.4 Consideration was given to these regulations during the assessment of the outline application and it was concluded that the requirements of Regulation 61 are not relevant to this proposal and appropriate assessment of the project would not be required.

8.5 The application site is not in the close vicinity of any designated (European) sites of nature conservation. The environmental statement submitted with the outline planning application concluded that the proposals are unlikely to give rise to significant effects on the conservation objectives of the designated sites and no further concerns were raised in this regard.

8.6 There has been no change in terms of the impact on designated sites that would indicate that a Habitats Regulation Assessment would now be required.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations)

8.7 The Outline planning application was EIA development and was accompanied by an Environmental Statement. This application is therefore a 'subsequent application', as defined within the EIA Regs.

8.8 Regulation 9 of the EIA Regulations deals with subsequent applications

where environmental information has previously been provided. It states that where it appears to the planning authority that the environmental information already before them is adequate to assess the significant effects of the development on the environment, they must take that information into consideration in their decision for subsequent consent.

- 8.9 The existing environmental information, along with the updated monitoring surveys and reports for protected species which have been submitted are considered to be adequate to assess this proposal and this information has been taken into consideration in determining this application.

Natural Environment and Rural Communities Act 2006

- 8.10 The Natural Environment and Rural Communities (NERC) Act (2006) Section 40(1) places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. The duty applies to all local authorities and extends beyond just conserving what is already there to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

- 8.11 The potential impact of the application proposals upon biodiversity interest is discussed later in this report.

Equality Act 2010

- 8.12 Consideration has been given to the provisions of Section 149 of the Act (public sector equality duty) in the assessment of this application. The proposals do not raise any significant issues in this regard.

Crime and Disorder Act 1998

- 8.13 Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998 (impact of Council functions upon crime and disorder), in the assessment of this application and the comments of the Design Out Crime Office have been considered in assessing the design and layout.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 8.14 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states;

- 8.15 In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority (LPA)... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 8.16 Section 72(1) of the same Act states;
...with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

- 8.17 These statutory duties and the impact on heritage assets are discussed in

the 'other matters' section of this report.

Principle of Development

- 8.18 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The relevant parts of the West Suffolk Development Plan are the adopted Core Strategy, the Vision 2031 Area Action Plan for Haverhill and the adopted Joint Development Management Policies Document 2015.
- 8.19 National planning policies set out in the NPPF and the adopted masterplan and design code for this site are also key material considerations.
- 8.20 The principle of development for this site was established through the identification of land on the north-western edge of Haverhill as a location for growth in policy CS12 of the Core Strategy. Policy HV4 of the Haverhill Vision 2031 went on to allocate 42 hectares of land of as a strategic housing site. The masterplan was then produced, setting out the overarching vision for the site.
- 8.21 This outline application was accompanied by a series of parameter plans which established the extent of land for development, the distribution of uses, building heights and densities, and land for open space and landscaping. A S106 agreement associated with the outline approval secured the level and timing of financial contributions and other infrastructure.
- 8.13 Condition B3 of the outline permission requires the reserved matters application to be generally in accordance with the land use parameter plan and the landscape parameter plan. The other parameter plans informed the development of a design code, which was produced alongside the first reserved matters application.
- 8.14 The density parameters for this parcel set out in the design code identify the majority of the parcel as having a density of between 45 and 55 dwellings per hectare. The southern and south eastern boundaries are identified as being suitable for a density of between 35 and 45 dwellings per hectare. These densities were based on the parameters set out in the outline application and the associated Environmental Statement.
- 8.15 The 129 dwellings proposed in this application equates to a density of 44 dwellings per hectare across the application site which is within the approved parameters.
- 8.16 In terms of the extent of the development, the size and location of the parcel is in broad accordance with the land use and landscape parameter plans conditioned with the outline consent and with the design code which further developed those plans. The parcel leaves sufficient room to the south to accommodate the required allotments and associated green space and the space to the east is commensurate with the space originally shown for this green corridor. To the west, the development is set away from the existing hedge and ditch, with the linear park proposed to the west of the ditch outside the scope of this application.

- 8.17 In terms of the scale of development, a height parameter plan was submitted with the outline consent and subsequently incorporated into the design code. This allows for heights across the majority of the parcel of up to 3.5 storeys with some areas on the southern and south eastern boundaries being limited to up to 3 storeys.
- 8.18 The majority of the proposed development is 2 storey a small number of single storey dwellings and some 2.5 storey properties. All these heights are well within the established parameters. However, on the northern edge of the development at the front of the site, four storey apartment buildings are proposed. These buildings have a flat roof design which results in the overall height being lower than the alternative and previously submitted 3.5 storey design, albeit with a differently perceived bulk.
- 8.19 The heights parameter plan is not conditioned on the outline consent and it therefore acts as a guiding principle rather than a fixed requirement. In this case it is considered that the use of a four-storey flat roof design which is not greater in overall height than a proposed 3.5 storey alternative could be acceptable in principle. However, this does not negate the need for the detail of the proposal to be scrutinised in terms of its impact and compliance with development plan policy.
- 8.20 In light of the above, it is considered that in terms of the scale and extent of development, the proposals are broadly in accordance with the approved parameter plans and could be acceptable in principle, provided that the design and layout delivers a scheme that is consistent with development plan policies, the masterplan and the design in terms of the quality of the built environment created.

Design, layout, and amenity

- 8.21 The NPPF stresses the importance the Government attaches to the design of the built environment, confirming good design as a key aspect of sustainable development, indivisible from good planning. The Framework goes on to reinforce these statements by confirming that planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 8.21 These design aspirations are reflected in policy DM2, which states that proposals for all development should create a sense of place and/or local character. In the case of residential schemes, Policy DM22 states that proposals should create a coherent and legible place that is well structured so that it is visually interesting and welcoming. New dwellings should be of high architectural quality and should function well, providing adequate space, light, and privacy.
- 8.22 This application falls within the character area known as Boyton Place in the design code. This area includes the local centre to the west and a further parcel to the south west of the application site. The design code envisages that this parcel will comprise predominantly contemporary architectural styles.

- 8.23 This parcel was initially submitted with the application for phase 2a to the north but was withdrawn from that application to allow for amendments to the made to the design approach and layout. Further changes have also been made during the life of this application.
- 8.24 The revised layout creates a clear hierarchy of routes and spaces across the parcel, with individual character areas including the central green space, a neighbourhood courtyard and urban mews spaces. Additional planting and tree pits have been used to green up the spaces and soften the streets and additional space has been provided on the periphery where the grain of development is also looser to give a lower density and a more informal feel.
- 8.25 Changes have been made to the design of the dwellings to give a more distinctive contemporary approach, using different window and door types to the previous parcels and a variety of different brick detailing to provide interest and variation to the buildings.
- 8.26 Concerns have been raised by members of the public, the Town Council and local members regarding the design approach and specifically the design of the apartment buildings in terms of their overall height, scale and incongruous appearance in this location.
- 8.27 The use of apartment buildings within the development is an accepted part of the design approach set out in the masterplan and the design code and it is a necessary part of achieving the required densities across the site. The initial scheme proposed in the previous application located the apartment buildings at the southern end of the site closer to Ann Suckling Road. It is acknowledged that the new position of the apartments in this application is on a higher part of the site. However, there are other factors that make this a good location for the apartment buildings. It is the furthest point from the existing development to the south and further from the listed building to the south east. It also fronts onto the main route through the wider development on the approach to the local centre and is closer to the area of public open space including a play area and sports pitches.
- 8.28 The previous application included four-storey apartments with a pitched roof arrangement. When this application was the submitted, the relocated apartments remained at four-storeys, but with a flat roof design to reduce the overall height. During the course of this application the applicant submitted a revised design for a three and a half storey building, with a pitched roof. This technically accorded with the parameter plan but resulted in a higher form of development, which sat awkwardly in the streetscene. This change in design also failed to overcome the concerns expressed by the Town Council, neighbours and the Ward Members. The applicant has therefore decided to revert to a four-storey flat roof design which has a lower overall height, which can be better assimilated into the streetscene at the front of the site.
- 8.29 The flat roof design gives a crisper, more contemporary feel. It also incorporates projecting brick work, a central projecting element and different materials to help break up the bulk of the building. This design approach accords with the character area set out in the design code and would help to create distinctive character for this part of the site. The

applicant has also advised that the flat roof design will enable the use of roof mounted solar arrays which would bring an additional benefit in terms of sustainability. The detail of these would be secured by condition.

- 8.30 Cross section drawings produced by the applicant demonstrate that the buildings would not be unduly prominent when viewed from Ann Suckling Road and would be mostly obscured by the intervening development. As such, whilst there are objections to this element of the scheme it is considered on balance that the design is an acceptable one in planning terms with no demonstrable harm such that the application could be refused on the grounds of design matters.
- 8.31 Design Out Crime Officer comments were received in relation to the first iteration of the plans raising some concerns with the proposals raising some specific concerns with aspects of the design and layout.
- 8.32 There is a balance to be struck between the principles of secure by design and other urban design requirements, but adhering to secure by design principles where possible can help to reduce crime in a development once built and occupied.
- 8.33 There is some tension between the use of parking courts and secure by design principles. However, parking courts will need to be used on this and other parcels both to allow for apartment buildings and to prevent the streets from being dominated by frontage parking.
- 8.33 The developer has responded to the concerns around parking courts and has made several changes. All fences within parking courts and narrow path routes are to be 1.5m close board fencing with 0.3m trellis fencing above to reduce the opportunity of people climbing over and add more natural surveillance. The areas have also been re-designed to have properties facing onto parking spaces where possible. The parking courts have also been improved by breaking down the larger parking areas into smaller spaces and introducing more flats over garages (FOGs) to provide additional natural surveillance. Parking courts also now have a single entry/exit point and plots with undercroft parking are closed off with close boarded fencing or walls to avoid through routes.
- 8.34 Car parking will be provided through a number of forms across this parcel and the rest of the development and it is not possible or desirable from a design perspective to insist that this is within garages or at the front of properties. Similarly, it is not possible for every property to be designed in such a way that the front door is flush with the whole front elevation.
- 8.35 The parcel is designed to be outwardly looking to the east and west to provide natural surveillance to the green corridors. The purpose of the green spaces is to provide important recreational routes through and around the wider site to encourage sustainable modes of travel and to provide green off-road routes to enhance amenity. These routes also connect the strategic green infrastructure across the wider site. Connectivity to these routes has been improved with access to the east and west and a path has been incorporated around the edge of the basin in the south west corner as suggested by the Landscape Officer.

- 8.35 In terms of amenity, it is considered that future occupants of the proposed development would enjoy an acceptable level of residential amenity. Garden sizes are adequate, and the positioning and scale of dwellings is such that there would be no unacceptable levels of overlooking or overbearing impacts.
- 8.36 The Public Health and Housing Officer has confirmed that the noise mitigation measures previously proposed for the residential properties to the southern boundary of the Phase 2A would be sufficient for the dwellings on this parcel and a further noise assessment is not considered necessary. These mitigation measures would be secured by condition.
- 8.37 The Council's Public Health and Housing Officer also raised some concerns in terms of the bedroom sizes of some of the units. There have been some changes to the house types during the amendments which have removed some of units that were highlighted, although some do remain.
- 8.38 There is no statutory requirement in terms of the minimum size of bedroom within new dwellings and no specific size is required by any current development plan policies. Policy DM22 (k) requires that new dwellings are fit purpose and function well, providing adequate space, light and privacy. Looking at the proposed dwellings in the round it is considered that they would meet the requirements of the current policy.
- 8.39 Representations have raised concerns over the impact on the amenity of existing residents. In this respect, whilst the buildings would be visible from neighbouring properties it is considered that they would be sufficiently distant from any neighbouring properties to ensure that they would not have an adverse impact on amenity through overlooking or being overbearing.
- 8.40 Concerns have also been raised over the positioning of the dwellings on the eastern edge of the site, as a private drive is now proposed in this location rather than rear gardens. There is concern that this will cause noise and disturbance to properties to the east and the rationale behind this is questioned. Having properties backing on to this part of the site would provide a larger buffer, but it would remove any natural surveillance from the path and would do little to help deter anti-social behaviour or crime in these locations. Having an active frontage creates a safer and more attractive space and it is considered that the private drives, which will serve a limited number of properties, would not introduce an unacceptable level of noise and disturbance to neighbours.
- 8.41 Overall, it is considered that the proposed development would create a locally distinctive sense of place with architecture appropriate for the character area. The layout provides sufficient space for soft landscaping and street trees that will enhance the development and improve the quality of the built environment. There are also good links to the adjoining open spaces, which have appropriate levels of surveillance and create opportunities for circular walks within the wider development.
- 8.42 The development is therefore considered to be in accordance with policies CS1, CS2, CS3 and CS12 of the St Edmundsbury Core Strategy 2010, Policies DM2, and DM22 of the Joint Development Management Policies Document 2105 and the guidance set out in the NFFP. The proposals are

also considered to meet the requirements of the masterplan and the design code in terms of the quality of the design and layout of the development parcel and the level of public and private amenity provided for future occupants.

Access and Movement

- 8..44 The NPPF promotes all forms of sustainable transport, advising that development should provide for high quality walking and cycling networks. It goes on to advise that development should not be prevented or refused on transport grounds, unless there would be an unacceptable impact on highway safety, or the residual cumulative impacts of development would be severe.
- 8.45 Policy DM2 of the Joint Development Management Policies Document also requires that new development should produce designs that accord with standards and maintain or enhance the safety of the highway network and policy DM46 confirms that the authority will seek to reduce over-reliance on the car and promote more sustainable forms of transport. This is also a key aspiration of the adopted masterplan and design code, which seeks to maximise accessibility creating walkable neighbourhoods.
- 8.46 The road serving this parcel was approved in an earlier reserved matters application and is designated as a primary street in the adopted design code. It has a 3.5 metre shared cycle/footway on the southern side and a separate footway on the northern side. These cycle ways and footways will form part of the wider safe, lit, sustainable routes to be provided throughout the overall site.
- 8.47 A pedestrian and cycle crossing point is provided for this section of the road network to ensure there is a safe crossing to get to the playing fields to the north east of this site for those travelling from the south and to allow those in the northern part of the site safe crossing to the local centre and school to the south.
- 8.48 The wider connectivity through and around the site was set out in the design code, with a key requirement for a pedestrian route running north to south on the eastern edge of the parcel providing an off-road connection from Ann Suckling Road to the playing fields and open countryside to the north. A wider linear park is proposed to the west of this parcel, also running from north to south. This is outside the scope of this application, but the development is positioned to look out towards it to provide a degree of surveillance.
- 8.49 Representations have highlighted a concern about a lack of places for pedestrians to stop and rest both on this parcel and across the wider strategic site. It is considered that appropriate street furniture to include bins and appropriate seating could be secured by condition.
- 8.50 The internal road layout reflects the road hierarchy set out in the design code, with narrower, more intimate mews streets leading from a central street. A raised square at the centre of the parcel helps to aid traffic calming on the transitions to these smaller streets and landscaped buildouts have been incorporated into the streets themselves to further

slow down traffic and create a more pedestrian friendly space. Space is also provided for pedestrians off the carriageway along the property frontages.

- 8.51 Through the central square sufficient space has been provided to provide a separate route through for pedestrians alongside the carriageway as well as an off-road route through the central pocket park area. The specific details of and finish of this area and the shared surface street would be secured by condition to enable some flexibility in the design to enable the applicant to work with the highway authority to ensure and safe design that meets highways adoption standards.
- 8.52 The highways officer has noted some remaining concerns with aspects of the design, particularly the distribution of the visitor parking, whilst noting that they would not be sufficient to recommend a refusal of the development on highways grounds.
- 8.53 To address the concerns raised by the highway authority, additional visitor parking has been included more centrally within the parcel. The applicant has confirmed that visitor spaces will not be in the ownership of dwellings and a condition will be used to secure appropriate detailing and signage to ensure that these are available for use in perpetuity. A further kerb detailing condition would also be used as suggested by highways to design out obstructive parking on the footways.
- 8.54 On balance, is considered that the revised layout creates a safe and attractive network of streets and private drives. The layout also facilitates the off-road pedestrian link required along the eastern boundary.
- 8.55 In light of the above, the development is considered to be in accordance with policies CS3, CS7 and CS12 of the St Edmundsbury Core Strategy 2010, Policies DM2, DM44 and DM46 of the Joint Development Management Policies Document 2105 and the guidance set out in the NFFP. The proposals are also considered to be generally in accordance with the masterplan and the design code in terms of the accessibility and sustainable transport.

Landscape and ecology

- 8.56 The NPPF confirms that the planning system should contribute to and enhance the natural environment by minimising impacts on biodiversity and providing net gains where possible (paragraphs 174 and 175). This is reflected in policies DM11 and DM12 which seek to safeguard protected species and state that measures should be included in the design of all developments for the protection of biodiversity, the mitigation of any adverse impacts, and enhancements commensurate with the scale of the development.
- 8.57 There are no sites of international or national importance within or directly adjacent to the north west Haverhill strategic site. There are locally designated wildlife sites and sites of local interest, but these do not fall within the red line for application. However, there are other habitats within the application site including, arable land, field margins, hedgerows, trees

and ditches, all of which contribute to the biodiversity of the site and have the potential to support protected species.

- 8.58 A number of concerns have been raised in relation to landscape and ecology and the applicant has submitted revised proposals and additional information to address these concerns. Further comments from Ecology and Landscape are awaited and the committee will be updated on that response.
- 8.59 The concerns in terms of landscape and ecology centred on the following issues:
- The removal of hedgerow and potential need for translocation of plants
 - Impact on retained hedges
 - Compensatory hedge planting
 - Impact on bats from external lighting
 - The inaccuracy of the ecological constraints plan and the lack of an ecological enhancement strategy with appropriate detail on biodiversity enhancement
 - Lack of space for strategic green infrastructure.
- 8.60 In terms of hedgerow removal and retention, part of the hedgerow at the north of the site has been removed to facilitate the primary road (as approved under reserved matters application DC/20/0615/RM). Whilst hedgerow retention is recommended where possible, it is accepted that there will be some locations where removal will be needed to facilitate road access. In this context the previous removal was acceptable on balance, subject to compensatory planting in this phase.
- 8.61 No further hedgerow removal is proposed in this application and a full arboricultural method statement and tree protection plan are required prior to the commencement of development, secured by condition on the outline consent. In addition to the tree and hedgerow protective fencing, the submitted ecological enhancement plan recommends that all habitat to be retained, including ditches, should be fenced to protect them from damage during construction. This can be secured by a further condition.
- 8.62 In terms of the botanical interests of the site and the need for translocation of species, the updated reports confirm that the rare sulphur clover and dwarf spurge, whilst present on the wider site, are not present on phase 2B. Bee orchids, whilst present on the wider site are also not present on this phase. As such no translocation of plants is required in association with this application.
- 8.63 In terms of the retained hedgerow, the submitted reports state a buffer zone of at least 4 metres from the hedge base, which is measured from the centre of the hedge, should be provided to ensure the hedgerow and its associated ground flora are not adversely affected by the development. The revised landscape plans show this 4-metre buffer and demonstrate that the proposed development would no longer encroach on it.
- 8.64 The amended landscape plans also show compensatory replacement hedge planting along the western half of the site frontage to create a new native hedge line. Additional planting would then extend this hedge all the way to

the western edge of the site. Further new hedge planting would continue down the western edge to meet the existing hedgerow further to the south. Native species hedge planting is also proposed along the majority of the eastern edge of the site, running from existing hedge in the north, down to the southern boundary of the site.

- 8.65 The soft landscaping proposals therefore secure a considerable amount of additional hedge planting in addition to the compensatory planting, which will provide better connected ecological corridors and enhance biodiversity.
- 8.66 In terms of mitigation measures, the report identifies that a sensitive lighting strategy is required to ensure that retained boundary features remain unlit by the development. The report recommends that a sensitive lighting strategy be agreed with the Local Planning Authority prior to construction works and this could be secured by condition.
- 8.67 In terms of ecological enhancement and biodiversity gains, the ecological enhancement plan identifies the scope for ecological enhancements to be incorporated within the proposed public open spaces, boundary treatments, private gardens and dwellings. The enhancements are based on the recommendations detailed within the species-specific survey reports and include:
- Retention and enhancement of existing hedgerows at site boundaries, where possible;
 - Planting of native or wildlife-attracting tree, shrub and wildflower species throughout the site;
 - Provision of a variety of bird boxes on proposed buildings, where possible;
 - Provision of 'Integrated Eco Bat Box' on proposed buildings, where possible; and
 - Provision of gaps for hedgehogs in fences (13-15cm x 13-15cm) bordering private gardens to allow their movement through the site, where possible.
- 8.68 The report and associated soft landscaping plans show approximately 106 trees to be planted across the site with native species including field maple, silver birch and hornbeam. The report states that 169 metres of native hedgerows and 210 metres of ornamental hedgerows are proposed to be planted across the site. Open space areas at the boundaries of the site will be seeded with wildflower meadow seed mix with some open space sections seeded with floral lawn mix and where existing boundary vegetation is retained it will be enhanced where possible with hedgerow seeded mix.
- 8.69 A number of integrated bat and bird boxes are proposed and the locations are indicated on the soft landscaping plans. Reptile hibernaculum is also proposed to be included at a suitable and secluded location to the southwest of the site.
- 8.70 Hedgehog friendly fencing installation is proposed across the site by leaving gaps in fences (about 13cm x 13cm) between domestic gardens and under gates to allow the free movement of hedgehogs across the site. This is noted on the soft landscaping plan although the details for the precise location can be secured by condition.

- 8.71 The Suffolk Wildlife Trust recommended that a Landscape and Ecological Management Plan be produced. This is also recommended in the submitted report and is already secured by a condition on the outline consent.
- 8.72 As stated earlier in the report the extent of the parcel allows for the required quantum of green spaces around it to facilitate the wider green infrastructure for the development which was secured with the outline consent. This is being dealt with under a separate reserved matters application and work is ongoing to provide a package of amendments to the local planning authority to overcome the concerns previously raised. The timing of the delivery of these spaces is secured within the S106 agreement associated with the outline planning permission.
- 8.73 In terms of the landscaping within the parcel, the applicant has sought to improve the planting at the periphery of the site and some of the more intrusive parking spaces have been removed. Visitor parking spaces have been retained around the central green space and it is accepted that these do not make a positive contribution to the amenity of that space. However, there is a balance to be struck in terms of the overall needs of the development and in this case, it is considered that the benefits of parking in this location outweigh the adverse effects. Additional planting has also been provided here to better screen the cars from the green space and provide a buffer for the adjacent dwellings. Feature trees have also been added to central space and the courtyard area.
- 8.74 Subject to the receipt of final landscape and ecology comments, it is considered that the proposed development, as amended, is acceptable in terms of ecology and landscape issues, provided that appropriate conditions are applied to secure the required mitigation and enhancement measures set out above.
- 8.75 The development would not introduce any adverse effects on protected species or sites, subject to following the recommendations of the submitted reports.
- 8.76 The development is therefore considered to be in accordance with policies CS1, CS2 and CS12 of the St Edmundsbury Core Strategy 2010, Policies DM2, DM11, DM12 and DM13 of the Joint Development Management Policies Document 2105 and the guidance set out in the NFFP. Subject to the securing the final planting details it is considered that the proposals would meet the aspirations of the masterplan.

Heritage impacts

- 8.77 The closest heritage asset to the application is Chapel Farm Cottage, a grade II listed building situated to the east of this development parcel.
- 8.78 The principle of residential development in this location has been established in the outline consent and as a result of this there will be an impact on the overall setting of this building as it changes from undeveloped agricultural land to a residential development. The development proposals at the eastern edge of the site closest to this building are within the height parameters set out at the outline stage and

generally, the number of buildings across the parcel above 2 storeys is low. The bat sensitive lighting strategy will remove obtrusive lighting from the eastern boundary of the site and this will also help to avoid further adverse effects on the setting of the building.

- 8.79 Development is set away from the eastern boundary with the green corridor and private drive providing a good degree of separation and scope to filter the views of the new houses from the listed building with additional tree planting along the eastern edge.

Other matters

Flooding and drainage

- 8.80 The development would be served by a previously consented drainage basin which would sit to the south of this parcel within the green space adjacent to Ann Suckling Road. This will be planted to enhance biodiversity and create an attractive addition to the green space.
- 8.81 The lead local flood authority has reviewed the latest drainage documentation and has confirmed that the proposals are acceptable.
- 8.82 Representations have raised a concern over the drainage ditch on the eastern side of the site and the need for regular maintenance to keep it clear from vegetation to avoid blockage and prevent flooding. The need for maintenance access to this ditch is noted and the scheme has been designed to ensure that access for maintenance can be achieved in line with the lead local flood authority's recommendations.

Affordable housing

- 8.83 Affordable Housing mix is not a reserved matter and as such the provisions relating to affordable housing must be secured either through condition or as part of the S106 agreement when the outline planning permission is granted.
- 8.84 In this case, the S106 secured 30% of the dwellings as affordable, with the requirement to submit a scheme to the Council for approval, outlining the delivery of affordable housing units for each phase.
- 8.85 The Strategic Housing Officer has confirmed that the mix of units indicated in this parcel meets the required mix and is acceptable, with all of the proposed affordable units being compliant with the National Space Standards.
- 8.86 Concern was raised regarding the room size of the fifth bedroom in a specific unit. However, this has been addressed through an amendment to the internal layout of that dwelling and the Strategic Housing Officer has confirmed that this is now acceptable.
- 8.87 Representations raised concerns over the clustering of the affordable housing on the parcel. Mixing the affordable housing throughout a site is desirable as it helps to create a balanced and mixed community. However, there is also an operational desire for registered housing providers to have properties located together. In this case the distribution of affordable

housing is in accordance with the Councils limits on clustering and the houses are also of the same design as the market units, helping to make them visually indistinguishable.

Waste collection

- 8.88 Concerns have been raised over the positioning of waste collection points in some locations within the site. Some of these concerns relate to the distances that bin crews would need to travel to collect the bins, and some relate to the distances that occupants would need to take their bins for collection.
- 8.89 In relation to the distances the crew would need to walk, this issue is principally related to the flats located within the parking courts. For these properties, the collection point would be just within the parking court, adjacent to the entrance. It is considered that this is a reasonable distance for collection crews to travel in a limited number of locations across the site. However, if this remained unacceptable to the waste service an alternative collection point could be provided closer to the kerb.
- 8.90 Turning to the distances occupants would need to take their bins, this is only an issue for those properties on the private drives at the periphery of the site. A technical solution to this would be to provide a further collection point further along the drive and ensure the specification of the surface is upgraded to be suitable for a collection vehicle.
- 8.91 In both cases technical solutions are available and can be secured through the details submitted to discharge the waste and recycling condition attached to the outline consent.

Summary and recommendation:

- 8.92 Section 38(6) of the 2004 Planning Act states planning applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Framework reinforces the approach set out in Section 38(6). It emphasises the importance of the plan-led system and supports the reliance on up-to-date development plans to make decisions.
- 8.93 The proposals are generally in accordance with the approved landscape and land use parameter plans. There is a slight departure from the height parameters set out in the design code in respect of the four storey flats at the front. However, the design approach results in an overall height that is lower than the 3.5 storey alternative and presents a design solution that would create a more distinctively contemporary entrance to this character area.
- 8.94 Following amendments and the submission of additional information, it is considered that the proposed development would create a well-laid out scheme that respects the aspirations of the masterplan and the design code.
- 8.95 It is considered that the development would offer a good level of amenity to future occupants and would not adversely affect the amenity of the existing residents on the northern edge of Haverhill.

- 8.96 With the exception of the flats at the northern part of the site the development is well within the height parameters assessed at the outline stage. In this context and given the scope for additional planting on the eastern edge it is considered that the reserved matters details would not adversely affect the setting of the listed building.
- 8.97 The proposals would contribute to the delivery a safe highway network for the wider strategic site, including an off-road shared cycle and footway and an additional pedestrian route through the green space to the east.
- 8.98 The Lead Local Flood Authority has confirmed that the proposed surface water drainage scheme is acceptable.
- 8.99 Subject to the receipt of final comments on landscape and ecology it is considered that there is appropriate space to secure the necessary planting details to soften the appearance of the development and deliver the biodiversity enhancements and mitigation outlined within the Environmental Statement. The proposals would not introduce any adverse effects on protected species, subject to conditions securing the recommendations of the ecology reports.
- 8.100 In light of the above it is considered that the development is in compliance with the relevant development plan policies and with the National Planning Policy Framework and it is therefore recommended for approval.
- 8.101 It is recommended that planning permission be **APPROVED** subject to the conditions summarised below. (Fully worded conditions will be provided in a late paper.)

- Development in accordance with approved plans
- Submission of materials
- Kerbing and street parking
- Visitor parking retention, detailing and signage
- Final details of the building outs within the shared surface streets and the pedestrian routes through the central square
- Specialist tree pit details
- Cycle storage details for the flats
- Visibility splays provided and maintained
- Deliveries and construction
- Noise mitigation measures
- Noise levels post occupation
- Bat sensitive lighting strategy
- Pre-construction badger check
- Precautionary method for reptiles
- Protective fencing for retained habitats
- Biodiversity enhancements implementation
- Hedgehog permeable boundaries
- Design out crime measures
- Street furniture within open spaces
- Details of roof mounted solar in the flats

Documents:

All background documents including application forms, drawings and other

supporting documentation relating to this application can be viewed online
[DC/21/0110/RM](#)