

St. Edmundsbury Borough Council

Mr Adam Day
Gladman House
Alexandria Way
Congleton
Cheshire
CW12 1LB

Case Officer: Julie Barrow
Direct Line: 01284 757621
Email: julie.barrow@westsuffolk.gov.uk

Reference: PREAPP/19/028

Today's date: 28 February 2019

Dear Sir/Madam

Pre application response

Proposal: **A proposed residential development of up to 140 dwellings comprising a policy compliant level of affordable housing, local equipped area of play (LEAP), sustainable urban drainage system comprising balancing ponds, structural planting and vehicular access comprising a priority junction off Hundon Road.**

Location: **Hundon Road Kedington Haverhill Suffolk CB9 7QT**

Thank you for your pre-application enquiry received on 16.01.2019. This letter outlines the discussions of our meeting held on 12.02.2019.

The following comments are made on the basis of the information provided. The issues raised may not be exhaustive, and should you submit a planning application, other issues may arise which could affect the outcome of any application.

All planning applications are assessed against the policies within the Statutory Development Plan for the borough, which currently comprises: the Core Strategy (2010); the Vision 2031 (2014); and the Joint Development Management Policies Document (Feb 2015). Copies of the plans and their policies can be found on the Council's website using the following link:

http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/stedmundsburylocalplan.cfm

The policies which are most relevant to your proposal are:

- 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 CS4 - Settlement Hierarchy and Identity

Planning and Regulatory Services, St Edmundsbury Borough Council, West Suffolk House, Western Way, Bury St Edmunds Suffolk, IP33 3YU

- Core Strategy Policy CS5 - Affordable Housing
- Core Strategy Policy CS7 - Sustainable Transport
- Core Strategy Policy CS13 - Rural Areas
- Vision Policy RV1 - Presumption in favour of Sustainable Development
- Vision Policy RV9 - Green Infrastructure in the rural areas
- Policy DM1 Presumption in Favour of Sustainable Development
- Policy DM2 Creating Places Development Principles and Local Distinctiveness
- Policy DM3 Masterplans
- Policy DM5 Development in the Countryside
- Policy DM6 Flooding and Sustainable Drainage
- Policy DM7 Sustainable Design and Construction
- Policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance
- 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 DM15 Listed Buildings
- Policy DM20 Archaeology
- Policy DM22 Residential Design
- Policy DM42 Open Space, Sport and Recreation Facilities
- Policy DM44 Rights of Way
- Policy DM45 Transport Assessments and Travel Plans
- Policy DM46 Parking Standards

Following the meeting a set of revised plans were submitted, reducing the extent of the development site and providing additional details in respect of off-site highway improvements.

Principle of development

The site is located outside the existing settlement boundary for Kedington but adjoins parts of it on its western boundary. It is understood that the site has been put forward as part of the Council's 'call-for-sites' and it will be assessed by the planning policy team in due course for the purposes of preparing a new West Suffolk Local Plan. The Council has published its Local Development Scheme and timeline and this can be viewed via

https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/18-12-20-LDS-Timeline-adopted-version.pdf

In the meantime the Local Planning Authority continues to make decisions in accordance with the adopted development plan, which as stated above consists of the Core Strategy (2010); the Rural Vision 2031 (2014); and the Joint Development Management Policies Document (Feb 2015).

Core Strategy Policy CS1 sets out the spatial strategy for St Edmundsbury and the protection of the natural and historic environment, the distinctive character of settlements and the ability to deliver infrastructure will take priority when determining the location of development. Policy CS4 identifies Kedington as a Key Service Centre and states that careful consideration will be given to maintaining the identity, character and historical context of settlements, to ensure new development does not detract from the environmental quality, townscape, functional vitality and settling of the settlement as a whole.

Kedington is described in the Rural Vision 2031 as having a good range of services and facilities, however, the document also points out that the scale of growth will be dependent on local environmental and infrastructure capacity and will need to respect the attractive character of the settlement. In addition, topographical constraints are fundamental to extensive development around the village.

The Joint Infrastructure and Environmental Capacity Appraisal 2009 considered whether there was any opportunity for growth in Kedington. In respect of land to the east of the village, the study concluded that no opportunity for major growth had been identified due to potential impacts on the landscape setting of the settlement and the separation from the main transport network. The study did conclude that there may be potential for small scale development on the fringe of the settlement, however, the current proposal would not represent 'small scale' development or be located on the 'fringe' of the settlement given the size of the site.

The evidence compiled as part of the development plan process indicates that Kedington is not capable of sustaining large scale growth. The development plan allocates two sites within the settlement on which residential development is appropriate, with an indicative number of 105 dwellings proposed. It is therefore considered that the development plan has made sufficient provision for a sustainable level of growth in Kedington.

Policy DM5 states that areas designated as countryside will be protected from unsustainable development and sets out the circumstances in which new or extended buildings will be permitted. The proposal clearly does not meet any of the exceptions to development and concerns regarding the capacity of local infrastructure, in particular the local road network, provision of sustainable forms of transport and education provision would indicate that the proposal does not represent a sustainable form of development and as such would not be supported at officer level.

Five year housing land supply

At our meeting we briefly discussed the Council's position in relation to its ability to demonstrate a five year housing land supply. The Council demonstrated, in a report dated September 2017, that it has 5.3 years housing land supply. As you may be aware, St Edmundsbury Borough Council and Forest Heath District Council become a single authority on 1 April 2019. The Council is therefore preparing a five year housing land supply for the single council and expects to be in a position to publish this on 1 April 2019. The Council is confident that it will continue to demonstrate that it has a five year housing land supply.

Notwithstanding the above, the following addresses a number of key material planning considerations and is based on the discussions at our meeting.

Impact on character and appearance of area.

The application site occupies a prominent position on the eastern side of the village. The topography of the site is such that there will be far reaching views of the proposed development from a number of directions. In particular the proposed development will feature prominently in the landscape when viewed from further east and it will significantly erode the rural edge to the village.

The proposal will result in a significant change to the character of the area with the loss of arable field and views towards the ridge to the south. A public right of way runs alongside the eastern boundary and even with a 'green edge' to the development, the scheme will be highly visible to users of the rights of way and those travelling along Hundon Road.

Policy DM13 requires development proposals to demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements. Any application should be accompanied by a Landscape and Visual Impact Assessment and it is suggested that the scope of the LVIA be agreed with officers prior to any study being carried out. Without the benefit of further information I take the view that the proposed development will have a harmful effect on the character and appearance of the area and would conflict with a number of development plan policies in this regard.

Connectivity

As discussed at our meeting, the proposed development appears to be 'bolted-on' to the village and offers few opportunities to connect with existing infrastructure. With the exception of possible connections into the public right of way to the east, all vehicles, pedestrians and cyclists would be required to use the single access point onto Hundon Road. It would be desirable for the development to connect into the existing built-form of the village to the west and if possible, provide safe and convenient linkages for pedestrians and cyclists to the school and other services and facilities available in the village. Such connections would also open up the green infrastructure within the site to

existing residents and help to integrate the development into the existing settlement.

Green infrastructure

In order to ensure that the open space provided on site is both fit for purpose and meets the objective of helping to assimilate the development into its surroundings, it is suggested that the green corridor on the western boundary is increased in width. Although not specifically mentioned by SCC Highways in their response to this pre-application advice request (see below), there may be a desire for development closer to Hundon Road in order to help reduce road speeds. If this is the case part of the green space shown on the frontage could be used on the western boundary.

The Council's SPD for Open Space, Sport and Recreation Facilities should be used to inform any proposal –

https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/SPD-Adopted-version-Dec-2012-pdf-s106-template-open-space-and-rec-facilities.pdf

Traffic and transportation

SCC Highways has been asked to comment on the proposals and has made a number of brief comments based on the information available. In particular it has been pointed out that the visibility splays need to be set back to 4.5m and not 2.4m as suggested.

SCC Highways share the concerns of the Local Planning Authority as to the suitability of the site in respect of pedestrian access to the rest of the village. Pedestrian facilities will need to be improved, especially to the school, due to the intensity of vehicle and pedestrians movements that will be created.

A full Transport Assessment will be required in order to satisfy SCC Highways that the local roads and junctions can cope with the level of development proposed. It is recommended that the scope of the Transport Assessment is agreed with SCC Highways prior to any survey work being undertaken. SCC Highways considered that more information would be required before they could comment in any more detail.

Polices DM45 and DM46 set out the Local Planning Authority's requirements in respect of Transport Assessments and Travel Plans and car parking provision. Your attention is also drawn to Policy DM44 in relation to any effects on the existing public right of way. There may be an opportunity to enhance the existing right of way given that it is unclear how it is accessed off Hundon Road.

Cultural heritage

Any application will need to be accompanied by a detailed heritage assessment. There are a number of listed buildings within reasonable distance and the acceptability of any proposal will very much depend on what contribution is made

by the development area towards their significance (in terms of contribution made by setting). The assessment should consider the significance of any heritage assets affected to include any contribution made towards that significance by their setting and how the proposal will affect that significance. This assessment should be used to inform proposals to develop the site in an effort to minimise/eliminate any potential harm.

Kedington lies within the rich archaeological landscape of the Stour Valley. As recorded in the County Historic Environment Record, sites of all periods lie within the vicinity of the settlement. It is recommended that advice is sought from the Suffolk Archaeological Service prior to submission of an application - <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/archaeological-planning-and-countryside-advice/>

Affordable housing

Policy CS5 dictates that 30% of the dwellings proposed on this site to be affordable. The mix, size, type and tenure of affordable homes should meet the local identified housing need. It is recommended that you seek further advice from the Council's Strategic Housing team in order to inform any future planning obligation discussions - housing.development@westsuffolk.gov.uk. The following indicative mix has been suggested at this stage:

34 affordable rent units - 4 x 1 bed wheelchair fully accessible ground floor flat/bungalow
6 x 1 bed flats
18 x 2 bed (4 person) houses
1 x 3 bed (5 person) wheelchair fully accessible bungalow
4 x 3 bed (5 person) house
1 x 4 bed (7 person) house

8 intermediate units - 5 x 2 bed (4 person) house
3 x 3 bed (5 person) house

The Affordable Housing SPD aims to ensure that affordable housing is not concentrated in clusters of more than 15 dwellings. This is to ensure the integration of the affordable homes within the market housing development, working towards social inclusion and to meet government aims of balanced mixed and sustainable communities.

https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/JointAffordableHousingSupplementaryPlanningDocuments.pdf

Planning obligations

Suffolk County Council has advised that the following financial contributions are likely:

Early years – 12 places x £14,530 per place = £174,360

Primary School – 35 places x £16,429 per place = £575,015

Secondary – 25 places x £18,355 per place = £458,875

Sixth form – 6 places x £19,907 per place = £119,442

Libraries - £16 per dwelling = £2,240

Ecology and biodiversity

Any application should be accompanied by an ecological appraisal together with any necessary species surveys. The Council will expect a net gain in biodiversity and it should be demonstrated how this can be achieved.

Flood risk and drainage

It is recommended that pre-application advice is sought from the Lead Local Flood Authority in order to inform the drainage strategies for the development. Any application will need to be accompanied by an appropriate flood risk assessment together with an outline surface water drainage strategy. The strategy should address the future management and maintenance of the SuDS features. It is also expected that development will contribute to the reduction of flood risk elsewhere and this should be fully explored within the context of the village.

Other matters

Any application should be accompanied by an appropriate site investigation report in order to address risks from land contamination.

Matters in relation to residential amenity, in respect of existing and future residents should also be addressed. Other matters in relation to construction and waste management will also need to be addressed.

Any proposals for new development are expected to adhere to broad principles of sustainable design and construction and optimise energy efficiency and this should be addressed in any submission.

The proposal will result in the loss of agricultural land and it expected that an assessment of the quality of the land be undertaken together with an assessment of the effects of its loss should development proceed.

It is understood that an outline planning application will be made, with matters in relation to access being determined. If the site is to be considered for future development the deliverability of the site should be assessed and it should be demonstrated that the site will come forward within a reasonable timescale.

The Council has endorsed an interim Technical Advice Note regarding space standards –

<https://www.westsuffolk.gov.uk/housing/spacestandardsforresidentialdevp.cfm>

As with any proposal, the only way to fully test the merits of the proposed development would be through the submission of a formal planning application.

Please see the attached list of relevant documents required, this is to be used as guidance only. It maybe when an application is submitted it comes to light further information is required, that has not been highlighted on this list.

The above comments are made at Officer level only and do not prejudice any future decision, which may be taken by this Planning Authority. I hope this information is useful to you, and if you require any further advice please do not hesitate to contact me. The information contained in this letter is based on the information provided and the current policy context. Any future changes in National and Local Policies will not be reflected in this response.

Yours faithfully

Julie Barrow

Julie Barrow
Principal Planning Officer

SUBMISSION CHECKLIST

You will need to provide the following information in order for your application to be validated (Please use the corresponding validation checklist when submitting your application)

- Completed application form, signed and dated
- Completed Ownership Certificate (A, B, C or D as applicable) as required by Article 12 of the Town and Country Planning (Development Management Procedure) (England) Order 2010

N.B. In addition, where Ownership Certificates B, C or D have been completed, notices as required by Article 11 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 must be given and/or published in accordance with this Article

- A location plan which identifies the land to which the application relates drawn to an identified scale and showing the direction of North. The site should be edged in red and any other adjoining land owned or controlled by the applicant edged in blue. Location plans should be to a scale of either 1:1250 or 1:2500 *(If based on OS data, the Plan needs to contain the relevant OS licence information as required by copyright law)*
- A copy of other plans and drawings or information necessary to describe the subject of the application, this may include:
 - Block plan of the site showing any site boundaries to a scale of 1:100 or 1:200
 - Existing and proposed elevations to a scale of either 1:50 or 1:100
 - Existing and proposed floor plans to a scale of either 1:50 or 1:100
 - Existing or proposed site sections and finished floor and site levels to a scale of either 1:50 or 1:100
 - Roof plans to a scale of either 1:50 or 1:100
- The appropriate fee

In addition, you may be required to provide the following:

Draft Heads of Terms (S106)
Officer Notes

YES ✓ NO ☐

Design statement/development brief Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Design & Access Statement Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Heritage statement / Heritage Impact Assessment Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Transport Statement / Assessment Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Daylight / Sunlight assessment Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
<hr/>				
Landscaping details Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Flood risk assessment Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Retail / Leisure impact assessment Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
<hr/>				
Open space assessment Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Landscape & Visual impact assessment Officer Notes	YES	✓	NO	<input type="checkbox"/>
<hr/>				
Tree survey / Arboricultural impact assessment Officer Notes	YES	✓	NO	<input type="checkbox"/>
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Biodiversity survey and report Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Noise impact assessment / Acoustic report Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Air quality assessment Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Sustainable Drainage Strategy Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Horse racing industry impact assessment Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Ventilation, Extraction details and Refuse disposal details Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Structural survey Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Lighting scheme / Light pollution assessment Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Affordable housing statement Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Environmental Impact Assessment Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
It is recommended that a screening opinion is obtained				
Existing and proposed car parking and access arrangements Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>

Land contamination assessment Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Statement of community involvement Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Planning Statement Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Energy Statement Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Viability Assessment Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Marketing Assessment Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Joinery, window and door details Officer Notes	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Travel plan Officer Notes	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>

If you require guidance on the context of the above reports/information, please view the Guidance on our website
(http://www.westsuffolk.gov.uk/planning/planning_applications/chooseplanningapp.cfm)