

Outline planning application for the erection of a pair of semi-detached dwellings –  
Land at Broad Road, Little Thurlow Green, Haverhill, Suffolk, CB9 7JJ  
Modece Architects

2227

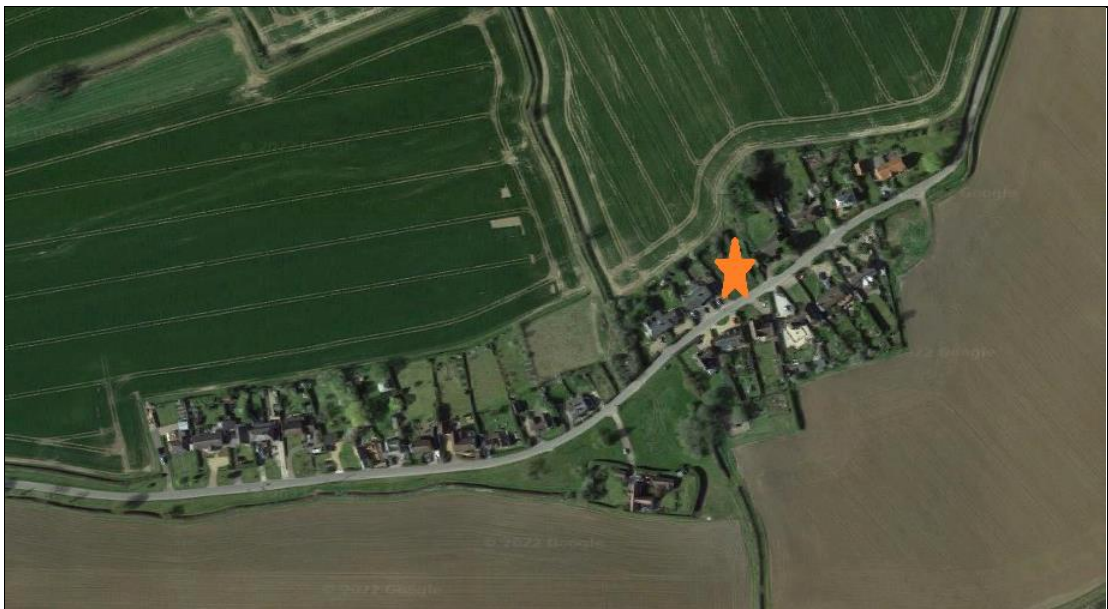
# PLANNING STATEMENT

**1.0 Introduction**

1.1 This statement is prepared in support of an outline planning application for the erection of two dwellings on land known at Broad Road, Thurlow Green, Haverhill, Suffolk.

1.2 It will consider the planning policy position and provide an overview of the relevant material considerations relating to the proposed development.

1.3 The extract below shows the location of the site relative to nearby development.



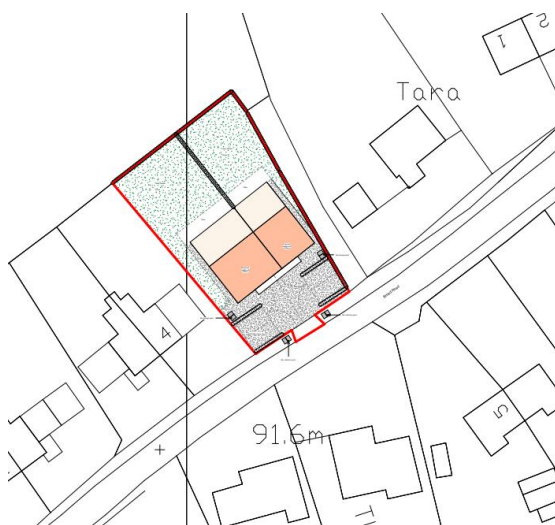
1.4 This Planning Statement should be read in conjunction with the indicative layout plan, visibility splay plan and the Design and Access Statement submitted with the application.

## 2.0 The Site

- 2.1 The site lies to the north side of Broad Road and comprises a parcel of land set towards the centre of the group of dwellings that form Little Thurlow Green.
- 2.2 Little Thurlow Green lies a short distance to the northeast of the village of Little Thurlow. It comprises a hamlet of residential properties located in a countryside location. Properties here are set to both sides of the road and are laid out in linear from fronting onto the road.
- 2.3 The site is unconstrained by any landscape designations, is not within a Conservation Area and is not adjacent to any listed buildings. It lies wholly in Flood Zone 1 such that it is not at risk of flooding.

## 3.0 The Proposal

- 3.1 The application is made in outline form with only the matter of access to be considered in detail.
- 3.2 Accompanying the application is an indicative plan showing how two dwellings could be accommodated on the site. The extract below is taken from this plan and shows a pair of semi-detached properties on the land.



3.3 As the image above shows, the proposal (as indicated) shows a pair of properties that are reflective of the pairs of semi-detached properties adjacent. Garden areas are provided to the rear, set away from the road, and a shared access and turning space is provided to the site frontage along with frontage parking to each property.

3.4 As the access details are for formal consideration, a second plan is provided which shows the details of the access and which demonstrates how visibility splays of 2.4m x 100m to the west and 2.4m x 51m to the east can be secured.

#### **4.0 Planning Policy**

4.1 The revised National Planning Policy Framework was published in July 2021. It sets out the Government's planning policy and is a material consideration when determining planning applications.

4.2 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers in interpretation the NPPF.

4.3 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.

4.4 The following policies of the Joint Development Management Policies Document, the St Edmundsbury Core Strategy and the Council's "Rural Vision 2031" document are relevant to the consideration of this application:

- Policy DM1 - Presumption in Favour of Sustainable Development
- Policy DM2 - Creating Places Development Principles and Local Distinctiveness
- Policy DM5 - Development in the Countryside
- Policy DM6 - Flooding and Sustainable Drainage
- Policy DM12 - Mitigation, Enhancement, Management and Monitoring of Biodiversity
- Policy DM22 - Residential Design
- Policy DM27 - Housing in the Countryside
- Policy DM46 - Parking Standards
- Policy CS3 - Design and Local Distinctiveness
- Vision Policy RV1 - Presumption in Favour of Sustainable Development

4.5 The relevance and consideration of planning policies to this proposal will be considered in the 'Planning Considerations' section of this statement which follows.

## 5.0 Relevant Planning History

5.1 In 2017, outline planning permission was granted on this site for a development described as *"1no. dwelling with associated access and parking"*. Reserved matters approvals were also secured.

5.2 These applications have confirmed that this site is a viable gap in the cluster and that permission under policy DM27 has already been granted here.

## 6.0 Planning Considerations

6.1 Paragraph 10 of the Revised NPPF states *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”*.

6.2 Paragraph 8 of the NPPF sets out three objectives for achieving sustainable development:

*“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”*.

6.3 The presumption in favour of sustainable development is set out in paragraph 11 of the NPPF, which identifies that planning permission should be granted for proposals which accord with the development plan and that development should only be refused where;

*“i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*

6.4 In terms of rural housing, paragraph 79 states that *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby”.*

6.5 Paragraph 80 states that:

*“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*

*a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*

*b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*

*c) the development would re-use redundant or disused buildings and enhance its immediate setting*

*d) the development would involve the subdivision of an existing residential building; or*

*e) the design is of exceptional quality, in that it:*

- is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and*
- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.*

6.6 A recent High Court judgment (dated 15th November 2017) has shed light on the correct interpretation of the NPPF when it comes to determining whether a development is isolated. It related to a case at Wethersfield in the nearby district of Braintree. The following is a concise

summary taken from the Planning Resource website (note that reference to paragraph 55 should now be read as paragraph 80):-

*“Developer Granville Developments had been refused planning permission to build the new homes off Lower Green Road, Blackmore End, Wethersfield, but successfully appealed to a planning inspector who granted consent in February this year.*

*He found that, even on the most favourable interpretation, the area's deliverable sites for new housing fell well below the five-year supply required by the National Planning Policy Framework (NPPF).*

*The development would not cause material harm to the character and appearance of the area and, although it was not within an established settlement boundary, there were a number of houses nearby and the bungalows could not be viewed as isolated dwellings in the countryside.*

*In challenging the inspector's decision, Braintree District Council argued that he had wrongly interpreted the NPPF. Given the paucity of services and amenities in the area, residents of the bungalows would be required to rely heavily on their cars and the new dwellings would clearly be isolated, it argued.*

*Mrs Justice Lang noted that the word isolated is not defined in the NPPF. However, in dismissing the council's appeal, she found that the council's interpretation was too restrictive.*

*She noted that there were existing dwellings to the north and south of the development site - which was originally home to agricultural buildings that had been demolished. There was also a home to the west, on the other side of a road.*

*In his decision, the inspector had also justifiably focused on the economic benefits of the scheme in providing work for local builders and the likelihood that two new households would give their custom to local businesses.”*



6.7 Specifically Mrs. Justice Lang concluded (paras.28 and 29):

*“28. NPPF 55 cannot be read as a policy against development in settlements without facilities and services since it expressly recognises that development in a small village may enhance and maintain services in a neighbouring village, as people travel to use them. The PPG advises that “all settlements can play a role in delivering sustainable development in rural areas”, cross-referencing to NPPF 80, “and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided...”. Moreover, in rural areas, where public transport is limited, people may have to travel by car to a village or town to access services. NPPF 17 penultimate bullet point identifies as a core planning principle to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”. But as the PPG states, NPPF 29 and 34 recognise that the general policy in favour of locating development where travel is minimised, and use of public transport is maximised, has to be sufficiently flexible to take account of the differences between urban and rural areas. The scale of the proposed development may also be a relevant factor when considering transport and accessibility. As Mr Dagg rightly pointed out, the policy in NPPF 17 in favour of focusing development in locations which are or can be made sustainable applies in particular to “significant development”.*

*29. For these reasons, I agree with the Defendants that the Claimant was seeking to add an impermissible gloss to NPPF 55 in order to give it a meaning not found in its wording and not justified by its context.”*

6.8 The decision of Mrs Justice Lang was the subject of reference to the Court of Appeal by Braintree District Council, and Lord Justice Lindblom (on 28th March 2018) upheld the decision. Therefore, it follows that if the development is not isolated in the ordinary meaning of the word, paragraph 80 of the NPPF is not engaged

6.9 In this instance, the site lies in a significant cluster of properties in close proximity to a village containing some facilities and services. It is bordered to the east and west by residential

development. As such, given the site's positive relationship with existing residential properties, this cannot be considered to be isolated in the normal understanding of the meaning of this term. For these reasons, it can be concluded that the site is not isolated and the special circumstances required to be demonstrated by paragraph 80 of the NPPF are not engaged in this case.

6.10 Policy DM27 states:

*“Proposals for new dwellings will be permitted in the countryside subject to satisfying the following criteria:*

*a. the development is within a closely knit ‘cluster’ of 10 or more existing dwellings adjacent to or fronting an existing highway;*

*b. the scale of development consists of infilling a small undeveloped plot by one dwelling or a pair of semi detached dwellings commensurate with the scale and character of existing dwellings within an otherwise continuous built up frontage.*

*Permission will not be granted where a proposal harms or undermines a visually important gap that contributes to the character and distinctiveness of the rural scene, or where development would have an adverse impact on the environment or highway safety.*

*Note: A small undeveloped plot is one which could be filled by one detached or a pair of semi-detached dwellings where the plot sizes and spacing between dwellings is similar to adjacent properties and thereby respects the rural character and street scene of the locality”.*

6.11 Taking the criteria within DM27 in turn, the site falls within a closely knit cluster of ten or more dwellings adjacent to and fronting an existing highway. It thereby meets with criterion a) of policy DM27.

- 6.12 The proposal does provide for the delivery of a pair of semi-detached dwellings on a small undeveloped plot commensurate with the scale and character of existing dwellings within an otherwise built up frontage and therefore clearly meets part (b) of Policy DM27.
- 6.13 The gap is not considered to be visually important. It is a parcel of land within a cluster of properties but is of no particular importance to the group of properties here.
- 6.14 As such, it can be seen that there is compliance with the provisions of policy DM27 in respect of this proposal.
- 6.15 Furthermore, at Appendix 1 to this statement is an appeal decision dated 20<sup>th</sup> October 2022 (APP/F3545/W/22/3291947 - Land North of Willow Tree Farm, Mill Road, Brockley IP29 4AT) which relates to an appeal in the West Suffolk district and which addresses the very same issues that are considered here.
- 6.16 In that case, the Inspector found that:

*“8. Policy DM27 of the JDMPD indicates that proposals for residential dwellings in the countryside will be permitted subject to criteria. Criterion a) of DM27 requires development to be withing a closely knit cluster of 10 or more existing dwellings. There is dispute between the parties as to whether Mill Road would qualify as a cluster of development for the purposes of policy DM27. Although the existing dwellings in the vicinity of the appeal site are more spacious, Mill Road nonetheless contains at least 10 dwellings including those adjacent to the appeal proposal as well as those to the east of the site. As such, I consider the proposal would accord with policy DM27(a).*

*9. Criterion (b) of DM27 requires the infilling of a small undeveloped plot by 1 dwelling or a pair of semi-detached dwellings commensurate with the scale and character of the existing dwellings in an otherwise continuous frontage. The note to policy DM27 indicates a small undeveloped plot is one that could be filled by a detached dwelling or a pair of semi-detached dwellings. The appeal proposal, whilst providing a relatively wide frontage, is for a single*

*dwelling. Mill Road has a mixed character but the proposed development would be of a similar scale to other nearby dwellings and it would infill the otherwise continuous linear development along that side of Mill Road. As a result, I consider it would accord with DM27(b) in this regard”.*

- 6.17 This decision demonstrates a consistent approach to the interpretation of policy DM27 relative to the consideration of how this proposal complies with those requirements. The applicants consider, therefore, that this adds weight to their contention that the proposal complies with policy DM27.
- 6.18 Attention turns, therefore, to the physical impacts of the proposal relative to the rural setting of the site, the environment and highway safety.

#### Design and Layout

- 6.19 Policies DM2 and DM22 provide the Council’s expectations with regards to design and layout, with policy DM22 setting out specific criteria against which this proposal can be considered.
- 6.20 The application is made in outline form such that only an indication of how the site could be developed is provided. The indicative layout provided shows how a pair of dwellings could be accommodated on the land, reflecting the pattern of development to this side of Broad Road. There is nothing to suggest that high quality dwellings could not be delivered here that respond appropriately to the site and surroundings and/or which enhances the character of the area. Indeed, the Design and Access Statement that accompanies the application shows the detailed assessment of the site and surroundings that underpins the indicative layout provided, and provides an analysis of the design issues that would be brought forward in a detailed design proposal subsequently.
- 6.21 The submitted layout demonstrates that two dwellings and all of the associated infrastructure required to support them (including garden space, parking space, turning areas and access drive) can be readily accommodated on the site and that this would not give rise to conflict with the pattern of development in the locality.

6.22 Paragraph 130 of the NPPF provides further design expectations for new development, requiring planning policies and decisions to ensure that developments:

*“a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.*

6.23 The proposed dwellings will sit comfortably on the site. They will be designed to be respectful of the character and scale of adjacent development, and are therefore fully respectful of the provisions of policies DM2 and DM22 along with the expectations of paragraph 130.

#### Highway Safety and Parking

6.24 Sufficient space is available on site to accommodate the entirety of the parking and manoeuvring needs of two dwellings on this site, meaning that vehicles can enter and exit the site in forward gear and in a safe manner.

- 6.25 The new access is sensitively sited and would enable safe and suitable access onto the site from this lightly trafficked road. The proposal would therefore be in accordance with paragraph 110 of the NPPF

Flood Risk and Drainage

- 6.26 The site lies outside the designated Flood Zones 2 and 3 and suitable drainage can be designed to ensure that the development does not increase the risk of flooding elsewhere.
- 6.27 The site is capable of delivering adequate surface and waste water drainage.

Land Contamination

- 6.28 The application is supported by the Council's Land Contamination Questionnaire and an Environmental Report which demonstrates that the development is not at risk from land contamination.

Heritage Impacts

- 6.29 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local planning authorities to have special regard to the desirability of preserving listed buildings and their settings (Sections 16 and 66).
- 6.30 The site is distanced from the nearest listed building, White Cottage, by a number of existing dwellings such that development of this site would have no detrimental impact on the setting of White Cottage.
- 6.31 For these reasons, the proposal is found to give rise to no harm to heritage assets.

Housing Need

6.32 The West Suffolk Housing Strategy 2018 sets out the Council's "vision for improvement in the quality and delivery of housing to meet local needs, not just now, but for decades to come".

6.33 In terms of rural housing, it identifies that:

*"Approximately 43% of West Suffolk's population live outside of the major towns. The provision of rural housing is therefore vital for the creation and maintenance of sustainable communities.*

*Outside the five main settlements in West Suffolk, house prices for all property types are well above the West Suffolk median at £284,363, compared to the median of £247,741 for the five main settlements. In addition, the availability of affordable properties for rent in rural areas is much lower than in our towns. The NPPF 2018 also introduces entry-level exception sites to support development of sites suitable for first time buyers.*

*In order to address these issues we will:*

- 1. Identify potential barriers and develop ways to accelerate delivery on sites which are currently allocated in our local plans, through the commissioning of a Housing Delivery Plan.*
- 2. Through the creation of a new West Suffolk local plan, identify sufficient land to meet our current and future housing needs to give certainty for residents and developers.*
- 3. Identify solutions to respond to specific housing needs such as first-time buyers, key workers, affordable housing, selfbuild, Co-Housing, Community Land Trusts and specialist housing".*

6.34 It goes on to recognise that:

*“West Suffolk’s total population is expected to increase by 10% by 2039, compared with 11% across England. The growth in population for those residents aged 75 and over is expected to be much larger. For residents in West Suffolk aged 75 and over we are expecting to see 84% growth with resident numbers rising from 16,600 to 30,600. The growth of this age group across England is expected to be 76%”.*

6.35 There does not appear to be local level housing needs information available for Little Thurlow Green. As such, the information contained in the Housing Strategy appears to be the best indicator of local housing need in the area. The proposal provides for two modest dwellings that would likely be suitable for family homes, first-time buyer properties or those looking to downsize. The dwellings will be accessible and designed for flexible living across a wide span of the community.

6.36 The proposal would, therefore, address a local need.

#### Sustainable Development

6.37 From an economic aspect, the construction of two new dwellings would provide much needed jobs for local people, and there would be a modest economic benefit from the purchase of materials also. Occupants of the properties would contribute to the local economy through the purchase of goods, their employment and involvement in community activity. It is, therefore, considered that the economic objective of sustainable development is met by this proposal.

6.38 The social aspects of new housing are embedded in the NPPF which states that *“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being”.*



- 6.39 The site is located in a cluster of dwellings where the Council's local plan policies support new development as a matter of principle. Nearby facilities in Little Thurlow include accessible location that would offer some opportunity for travel by alternative methods of transport. As such, the site would give future occupants the potential to travel via a variety of transport methods, thereby not providing a development that is entirely reliant on the car as its main mode of travel.
- 6.39 The site is located in a cluster of dwellings where there is general planning policy support for the provision of new dwellings. The policy test does not require a general 'accessibility' consideration, seeing development within small clusters in the countryside as a sustainable way to deliver rural housing without intruding into the countryside. As such, as the delivery of a local plan requires compliance with the NPPF as a matter of principle, then compliance with policies in that plan must be sustainable.
- 6.40 The addition of two new dwellings, in a location where future occupants could readily engage in village life, would support the social objectives of sustainable development and demonstrate social inclusion.
- 6.41 Furthermore, the delivery of these new dwellings would help to provide the supply of housing required by the NPPF and, therefore, it is considered that the proposal meets the social objective of sustainable development. Furthermore, the proposal's contribution to the Council's housing supply should not be underestimated. The applicants intend to carry out the development in a short timescale should permission be granted. In this regard, the site should be considered deliverable in the terms set out in the NPPF and should thereby be afforded further weight in terms of its sustainability credentials.
- 6.42 With regards to the environmental elements of the proposal, the proposed dwelling would be built to the recently updated Building Regulations standards which embed positive measures to reduce carbon emissions and energy usage. The proposal would also offer opportunities to provide an environmentally sustainable development through the incorporation of renewable

energy provision (including air source heat pumps), and would be constructed utilising water efficient taps, showers and toilets, and energy efficient white goods. Electric car charging provision would be included with any detailed submission.

- 6.43 Biodiversity improvements can be offered which will actively encourage biodiversity on the land, including log piles, swift bricks and bird boxes. This will be supported by new native landscape planting, with the hedging/trees currently on site being retained and reinforced where necessary. With this in mind, the proposal is considered to offer environmental gains that would support the environmental objective of sustainable development.
- 6.44 As such, it is felt that the proposal demonstrates a cohesive approach to sustainability that complies with the NPPF and is in line with the way in which the dimensions of sustainable development are applied by Planning Inspectors and the Planning Officers alike.

## **7.0 Planning Balance**

- 7.1 As identified through the course of this statement, there are a number of issues which the LPA will need to balance in reaching a decision on this proposal. This section of this statement seeks to work through these matters and balance them in a manner that is consistent with how both Planning Inspectors and the Council's Planning Officers have carried out the balancing exercise in respect of recent applications that bring about similar considerations.
- 7.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The consideration is, therefore, whether the development accords with the development plan and, if not, whether there are material considerations that would indicate a decision should be taken contrary to the development plan.

- 7.3 The development plan includes the Joint Development Management Policies Document, the St Edmundsbury Core Strategy and the Council's "Rural Vision 2031" document. In light of this application relating to a proposal for new housing, an important consideration in determining this application is that policy DM27 is applicable and allows for new development such as this in clusters of dwellings in the countryside, such that the development is acceptable in principle.
- 7.4 The proposal has been assessed against the three objectives of sustainable development. In respect of the economic objective, the applicant recognises that there would be modest benefits from the construction of the new dwellings and from the contribution made by future occupants into the local economy. However modest that may be, the proposal is economically sustainable.
- 7.5 In terms of the social dimension, the NPPF recognises the contribution made by the delivery of housing and the vitality of rural communities to the social aspect of sustainability. The site is located in a location where new infill development is acceptable as a matter of principle. In the absence of any social detriment, the proposal must be considered to be socially sustainable. Indeed, the proposal offers the opportunity to agree the scale and size of dwellings on the site such that would meet local needs.
- 7.6 The matter of environmental sustainability is, as is often the case in rural areas, more complex. The PPG recognises that there is a need to take a flexible approach to considering the potential for sustainable transport modes in rural areas and the site has been found to be well located in terms of the facilities and services that nearby centres have to offer. In this regard, and in the absence of any recognisable detriment to matters such as heritage assets, land contamination, biodiversity or flood risk, the proposal is found to be environmentally sustainable also.
- 7.7 This is particularly the case when the environmental benefits of the scheme are considered. These include:

- The use of renewable technologies would facilitate a low-carbon development;
- The construction of the dwellings would include significant insulation and energy efficient white goods, and would include water efficient showers and toilets;
- The introduction of ecological enhancements is proposed on the site.

7.8 These benefits are considered to go a significant way to offsetting any limited environmental harm that may be considered to occur. As such, any harm would not significantly and demonstrably outweigh the benefits of the scheme, where the delivery of two new dwellings to the market, including much needed single storey accommodation, would contribute to the districts housing supply. As such, the balancing of the main issues would result in a conclusion that the proposal is sustainable and, therefore, there would be a presumption in favour of it.

7.9 For all of these reasons, the proposal is found to be a sustainable development and should, thereby, be supported.