

Cordage 44 Limited  
Six Bells, Church Road, Felsham,  
Bury St. Edmunds, IP30 0PJ



# Planning, Design & Access Statement

CPC Ltd.  
Contact: Mr. Jake Russell  
Email: [jake@cpcplanningconsultants.co.uk](mailto:jake@cpcplanningconsultants.co.uk)  
Telephone: 01243 697707



## Document Control

**Applicant:** Cordage 44 Limited

**Project:** Six Bells, Church Road, Felsham, Bury St Edmunds, IP30 0PJ.

**Agent:** Jake Russell – CPC Limited

**Reference Number:** 02924

### Document Checking:

Prepared by: Jake Russell                      Signed by: JR

Checked by: Jeremy Heppell                      Signed by: JH

Issue	Date	Status
1	02/11/2023	Draft
2	06/11/2023	Second Draft
3	07/11/2023	Submission Version

## Contents

- 1.0 Introduction
- 2.0 Application Site and Surroundings
- 3.0 Planning History
- 4.0 Planning Policy Context
- 5.0 Key Development Considerations
- 6.0 Design
- 7.0 Access
- 8.0 Conclusion

## 1.0 Introduction

- 1.1 CPC Ltd (the “**Agent**”) have produced this Planning, Design and Access Statement, on behalf of Cordage 44 Limited (“Cordage Group” or the “**Applicant**”), in support of the resubmitted planning application at the proposal site (the “**Property**” or the “**Public House**”): **Six Bells, Church Road, Felsham, Bury St Edmunds, IP30 0PJ.**
- 1.2 The application seeks full planning permission from Mid Suffolk District Council (the “**Council**” or the “**LPA**”) for the following development:  
*“Erection of two detached dwellings and associated parking and landscaping to the rear of the public house, utilising the existing public house access, and reconfiguration of the public house car park.”*
- 1.3 The Six Bells Public House will remain in operation following the implementation of the proposals and will be served by 14 parking spaces.
- 1.4 A schedule of accommodation is given below:
- Plot 1: 3 bed 4 person – 115 sqm (GIA)
  - Plot 2: 3 bed 5 person – 105 sqm (GIA)
- 1.5 This Planning, Design and Access Statement has been informed by, and should be read in conjunction with the following documentation:
- Application Form
  - CIL Form
  - Covering Letter – prepared by CPC
  - Existing Survey – prepared by P Stubbington
  - Proposed Plans – prepared by PLC Architects
  - Heritage Statement – prepared by Roper-Pressdee Heritage
  - Arboricultural Impact Assessment and Method Statement – prepared by EcoUrban
  - Ecological Appraisal Report – prepared by Hampshire Ecological Services
  - Geotechnical Desk Study – prepared by TEC
  - Transport Statement – prepared by TPA

## 2.0 Application Site and Surroundings

- 2.1 The Site sits behind the existing Six Bells Public House in the village of Felsham. The Site can be accessed via the car park/beer garden of the Pub. The Site is currently not used by the Pub and therefore is surplus to operational requirements.
- 2.2 Felsham is located eight miles southeast of Bury-St-Edmunds and seven miles west of Stowmarket. Felsham is predominantly residential in character but residents have access to multiple services including a Post Office, Village Hall and automotive garage with good public transport (bus) links to the wider area.
- 2.3 The site is within Felsham Conservation Area, which contains several listed buildings, including the Grade II listed Six Bells public house.
- 2.4 The site is within Flood Zone 1 and at low risk of surface water flooding.



Proposed site layout

## 3.0 Planning History

3.1 The following planning applications/appeals are relevant to the application;

- **DC/23/00640** Erection of 2no detached dwellings and associated parking and landscaping on land to the rear of the public house – Refused 14/04/2023 on the grounds of harm to the character of the conservation area.
  
- **DC/21/02924** Erection of 2no detached dwellings and associated parking and landscaping on land to the rear of the public house – Refused 27/10/2021, and subsequent appeal dismissed on the following grounds:
  - Conservation area and listed building: whilst there would be no harm to the setting of the listed building, the proposed houses would have a bulky and cramped appearance which would erode the spacious quality of this part of the conservation area.
  - Living conditions: there would be no harm to the living conditions of future occupiers.
  - Highway safety: the proposals would not have an unacceptable impact on highway safety.
  
- **DC/20/04572** Erection of 3no detached dwellings and associated parking and landscaping on land to the rear of the public house – Refused 01/04/2021, and subsequent appeal dismissed on the following grounds:
  - Character and appearance of the area: whilst the proposed houses would not have an adverse effect upon the conservation area or listed building, they would have an adverse effect on the character and appearance of the area by reason of a significant increase in the overall built form, eroding the open verdant character of the area.
  - Living conditions: noise and headlights from cars would impact on the future living conditions of occupiers.
  
- **DC/20/02869** Erection of 3no detached dwellings and associated parking and landscaping on land to the rear of the public house, including the part demolition of a boundary wall to facilitate the creation of a new vehicular access from Church Road – Refused 15/09/2020 on the following grounds:
  - Potential contamination.
  - Harm to the listed building and conservation area from partial demolition of a boundary wall.
  - Insufficient visibility at the access.

- Cramped and contrived development.
  
- **555/11** Erection of 2no dwellings and garaging with new access for dwellings and public house  
– Refused 12/04/2011, and subsequent appeal dismissed on the following grounds:
  - Highway safety: the proposed new access would have no material effect on highway safety on Church Road.
  - Listed building: the proposed houses would not harm the setting of the listed building, but the demolition of a boundary wall to create the new access would be harmful to its setting.
  - Conservation Area: the proposed houses would not harm the conservation area, but the demolition of a boundary wall to create a new access would fail to preserve the character and appearance of the conservation area.
  
- **0179/10** Erection of 2no dwellings and garages and new access for dwellings and public house  
– Withdrawn 2010.

## 4.0 Planning Policy Context

- 4.1 Planning Policy Context Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that, in the determination of planning applications, decisions are made in accordance with the Statutory Development Plan of the District, unless material considerations indicate otherwise.
- 4.2 The Proposal Site is within the jurisdiction of Mid Suffolk District Council where the Local Plan comprises the Core Strategy, adopted in 2008 and updated in 2012, and the Saved Policies of the Mid Suffolk Local Plan, adopted in 1998. The emerging Babergh and Mid Suffolk Joint Local Plan has been found sound and is scheduled for adoption shortly.
- 4.3 The Site is located within the demise of an existing Grade II Listed building and within the Felsham Conservation Area, consideration is therefore given to the Felsham Conservation Area Appraisal.

### National Planning Policy Framework

- 4.4 The National Planning Policy Framework (the “NPPF”) was published in July 2021 and establishes overarching principles of the planning system which aim to contribute to the achievement of sustainable development.
- 4.5 Paragraph 2 of the NPPF states that: *“Planning applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.”*
- 4.6 Paragraph 8 of the NPPF stipulates the planning system has three overarching, mutual objectives for achieving sustainable development which are:
- a) *“Economic – helping to build a strong, responsive and competitive economy;*
  - b) *Social – supporting strong, vibrant and healthy communities and providing sustainable homes and by creating a well-designed environment with accessible services that support communities’ social well-being;*
  - c) *Environmental – protecting and enhancing our natural, built and historic environment; including making effective use of land and helping to improve biodiversity.”*
- 4.7 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means development plans should positively seek opportunities to meet the development needs of the area and be sufficiently flexible to adapt to rapid change and proposals should accord with an up-to-date development plan; and



- for decision-taking this means development proposals that accord with the development plan should be approved without delay.
- 4.8 When determining applications, paragraph 38 stipulates it is a requirement that Local Planning Authorities should approach decisions in a positive and creative way. Paragraph 38 also states that Planning Authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of an area.
- 4.9 Paragraph 47 states that planning law requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. It encourages that decisions on applications should be made as quickly as possible.
- 4.10 Paragraph 48 asserts that local authorities should give weight to relevant policies in emerging plans according to:
- a) The stage of preparation of the emerging plan
  - b) The extent to which there are unresolved objections to relevant policies
  - c) The degree of consistency of the relevant policies in the emerging plan to the NPPF
- 4.11 Paragraph 55 of the NPPF states that planning authorities should consider whether unacceptable impacts of a development can be made acceptable via planning conditions. Planning conditions should be kept to a minimum and only imposed if they meet the test of being necessary, relevant, enforceable, precise and reasonable to the development proposals.
- 4.12 Section 5 on delivering housing sets out the Government's commitment to boosting the supply of homes to meet local needs, and that land with permission should be developed without unnecessary delay.
- 4.13 Policy 64 states "*[the] provision of affordable housing should not be sought for residential developments that are not major, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)*". Major developments are those which generate a net increase in housing of 10 or more units.
- 4.14 Paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 4.15 Paragraph 79 places primacy on the sustenance of rural villages and their services through small-scale development.
- 4.16 Paragraph 93 aims to preserve community facilities. Planning policies and decisions should guard against the unnecessary loss of facilities and ensure that established facilities are able to develop, modernise and enhance. Decisions should also ensure that there is an integrated approach to considering the location of housing, economic uses and community facilities.

- 4.17 Paragraph 104 states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that; the potential impacts of development on transport networks can be addressed; opportunities to promote walking, cycling and public transport are pursued; the environmental impacts of traffic and transport can be identified, assessed and if necessary mitigated; and, to ensure patterns of movement, streets and parking are integral to the design of schemes.
- 4.18 Paragraph 110 asserts that in assessing application sites it should be ensured that; sustainable transport is promoted; safe and suitable access can be achieved for all users; and, any significant impacts on the transport network can be cost effectively mitigated.
- 4.19 Paragraph 111 states: ‘development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’.
- 4.20 Paragraph 112 stipulates that regarding transport, highways and access developments should:
- Give priority to pedestrian and cycle movements, within the scheme and with neighbouring areas; Address the needs of people with disabilities and reduced mobility;
  - Create safe, secure and attractive places which minimise the scope for conflict between pedestrians, cyclists and vehicles; and
  - Allow for the efficient delivery of goods, and access by service and emergency vehicles
- 4.21 Paragraph 120 (d) states that the development of under-utilised land should be promoted and supported, especially where it will meet an identified local housing need.
- 4.22 Paragraph 124 asserts planning decisions should support development that makes efficient use of land, with regards to; the need for different types of housing; local market conditions and viability; the desirability of promoting the regeneration of an area; and, the importance of securing well-designed, attractive and healthy spaces.
- 4.23 Paragraph 126 asserts the creation of high-quality buildings and places is fundamental to what the planning development process should achieve. Good design is a key aspect to sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.24 Paragraph 130 of the NPPF stipulates that *“planning policies and decisions should 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) *Optimize 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.”*

4.25 Paragraph 185 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

4.26 Paragraph 182 of the NPPF stipulates that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

4.27 Paragraph 194 states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 4.28 Paragraph 197 asserts that when determining applications, local planning authorities should take account of:
- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) The desirability of new development making a positive contribution to local character and distinctiveness.
- 4.29 Paragraph 202 stipulates that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

### Planning Practice Guidance

- 4.30 Planning Practice Guidance (the “PPG”) was published online in March 2014. It advises that:
- 4.31 *“The National Planning Policy Framework represents up-to-date Government planning policy and must be considered where it is relevant to a planning application or appeal. If decision takers choose not to follow the National Planning Policy Framework, clear and convincing reasons for doing so are needed. A development that is consistent with the National Planning Policy Framework does not remove the requirement to determine the application in accordance with the development plan unless there are other material considerations that indicate otherwise.”*
- 4.32 The Guidance advises that the Statutory Development Plan is *“the plan for the future development of an area”*.
- 4.33 It consists of: Development Plan documents adopted by local planning authorities, including any ‘saved’ policies from plans that are otherwise no longer current, and those development plan documents that deal specifically with minerals and waste. Neighbourhood Plans, where these have been supported by the local community at referendum and subsequently made by the LPA.
- 4.34 Regarding how decisions on planning applications must be made, it advises that: *“The National Planning Policy Framework stresses the importance of having a planning system that is genuinely plan-led. Where a proposal accords with an up-to-date development plan it should be approved without delay, as required by the presumption in favour of sustainable*

*development at paragraph 14 of the National Planning Policy Framework. Where the development plan is absent, silent or the relevant policies are out of date, paragraph 14 of the National Planning Policy Framework requires the application to be determined in accordance with the presumption in favour of sustainable development unless otherwise specified”.*

- 4.35 The PPG also states that, to be effective, Local Plans should be kept up-to-date and reviewed regularly, which it suggests is likely to be at least every five years.
- 4.36 Mirroring the NPPF (paragraph 14), the NPPG advises that where a development plan is absent, silent or relevant policies are out of date, applications should be determined in accordance with the presumption in favour of sustainable development.

### Mid Suffolk District Core Strategy

- 4.37 The Mid Suffolk District Core Strategy was adopted in September 2008. As the key Development Plan Document, it sets out the vision, objectives, spatial strategy and core policies that will guide development across the district until 2025, and beyond. A Core Strategy Focused Review was undertaken and adopted by the Council on 20th December 2012 (the “**Core Strategy**”).
- 4.38 **Policy CS 1 Settlement Hierarchy** designates Felsham as a secondary village. Secondary villages are capable of taking appropriate residential infill and development for local needs. **Paragraph 2.34** states that Secondary Villages will benefit from small-scale development to meet local needs but not the level of growth envisaged for primary settlements. **Paragraph 2.35** asserts that development proposals should be accompanied by supporting evidence of the need that is being met. **Paragraph 2.36** stipulates that settlement boundaries will be retained around these settlements to facilitate appropriate development, while directing it to appropriate locations and restricting the scope and scale of development. The position of settlement boundaries for these villages will be received in the Site Specific Allocation document to ensure that there is no over provision through inappropriate infill.
- 4.39 **Policy FC 1 Presumption in favour of sustainable development** states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- 4.40 **Policy FC 1.1 Mid Suffolk approach to delivering Sustainable Development** asserts that proposals for development must conserve and enhance the local character of the different

parts of the district. They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and the policies of the Mid Suffolk Core Strategy and other relevant documents.

4.41 **Policy FC 2 Provision and Distribution of Housing** stipulates that provision is made for allocating green field sites for at least 2,625 homes and associated infrastructure in Mid Suffolk over a 15-year period from the 1st April 2012. The release of land for housing will be phased to enable continuous delivery of housing for at least 15 years from the date of adoption and to ensure that priority is given to use of previously developed land where this is consistent with other sustainability considerations.

4.42 **Policy CS 3 Reduce contributions to Climate Change** states that Sustainable Construction techniques will be encouraged in all new dwellings to achieve at least a three-star rating under the Code for Sustainable Homes. This requirement will rise over the plan period and by 2013 new dwellings will achieve at least a four-star rating and by 2016 new dwellings will achieve a six-star (carbon zero) rating.

These standards require initiatives such as:

- Use of low water volume fittings and grey water systems
- Orientation to maximise solar gain
- High levels of insulation
- Adequate provision for separation and storage of waste for recycling; and
- Use of materials from a sustainable source in new development

4.43 **Policy CS 4 Adapting to Climate Change** asserts that all development proposals will contribute to the delivery of sustainable development and reflect the need to plan for climate change, through addressing its causes and potential impacts:

- **Flood Risk:** The council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.
- **Pollution:** To protect people and the environment from unsafe or unhealthy pollutants. Development that harms the quality of soil or air and/or causes noise, dust, odour or light pollution will be avoided wherever possible. Development proposals will have no adverse effect on water quality.

4.44 **Policy CS 5 Mid Suffolk's Environment** stipulates that all development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area.

- **Landscape:** The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encourage development that is consistent with conserving its overall character.
- **Design:** Development will be of a high-quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district. It should create visual interest within the street scene and where appropriate encourage active uses at ground floor level, creating uses of public space which encourage people to walk and cycle.
- **Historic Environment:** The Council will introduce policies in the other DPDs of the Local Development Framework to protect, conserve and where possible enhance the natural and built historic environment including the residual archaeological remains. These policies will seek to integrate conservation policies with other planning policies affecting the historic environment

4.45 **Policy CS 6 Services and Infrastructure** states new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development.

### Saved Policies of the Mid Suffolk Local Plan

4.46 The Mid Suffolk Local Plan was adopted in 1998 and comprised the primary planning policy document for the District prior to the adoption of the Core strategy. A number of policies from the Local Plan remain relevant to the proposals:

4.47 **Policy H3 Housing Development in Villages** states that applications for housing within settlement boundaries will be considered in relation to the appearance and character of the village, the effect on nearby residential amenity and highway safety and the availability of services and facilities. Such development will usually take the form of small infilling (up to five units) of undeveloped sites.

4.48 **Policy H 13 Design and Layout of Housing Development** outlines the principles of high-quality design that is expected to be achieved throughout the District.

4.49 **Policy H 15 Development to Reflect Local Characteristics** states that proposed new housing should be consistent with the pattern and form of development in the neighbouring area.

- 4.50 **Policy HB 1 Protection of Historic Buildings** states that the Council places a high priority on protecting the character and appearance of all building of architectural or historic interest. Particular attention is paid to protecting the settings of listed buildings.
- 4.51 **Policy HB 2 Demolition of Listed Buildings** states that proposals for the demolition of listed buildings, or the removal from the curtilages of features of historic interest, will be refused.
- 4.52 **Policy HB 8 Safeguarding the Character of Conservation Areas** states that priority will be given to protecting the character and appearance of conservation areas with particular attention paid to the form, grouping scale and design of new buildings; and, the nature and appearance of features including walls, fences and hard landscaping.
- 4.53 **Policy HB 9 Controlling Demolition in Conservation Areas** states that the Council will refuse the demolition of buildings or structures in conservation areas that make an important contribution to the character and appearance of their surroundings, unless the features is recognised as beyond repair; incapable of reasonably beneficial use; or, unattractive in its setting whereby its removal would be beneficial to the appearance of the area.
- 4.54 **Policy HB 13 Protecting Ancient Monuments** states that planning applications that would have adversely affect scheduled ancient monuments or other nationally significant monuments will be refused.

### Emerging Babergh and Mid Suffolk Joint Local Plan

- 4.55 The emerging Babergh and Mid Suffolk Joint Local Plan (the “JLP”) sets out the strategy for development up to 2036, including land allocations. Once adopted, the Draft JLP will replace the existing local planning policies for both Babergh and Mid Suffolk.
- 4.56 **Policy SP01 Housing Needs** states that across the plan area the mix, type and size of the new housing development will be expected to reflect established needs in the most relevant district needs assessment. The Joint Local Plan will seek to deliver a minimum of 10,008 additional dwellings (556 dwellings per annum) within the Mid Suffolk district over the plan period (2018-2036).
- 4.57 **Policy SP02 and LP07 Affordable Housing** seeks to retain and deliver a 35% requirement for affordable housing on relevant sites of ten or more dwellings or sites of 0.5ha or more.
- 4.58 **Policy SP03 Settlement Hierarchy** states that development within Hinterland and Hamlet Villages will be permitted within settlement boundaries where:
- I. Design is sympathetic to its rural surrounding and demonstrates high-quality design by having regard to the relevant policies of the plan;



- II. A high standard of hard and soft landscaping, appropriate for the location is used;
  - III. Hedgerows and treelines which make an important contribution to the wider context and setting are protected, particularly in edge of settlement locations; and
  - IV. The cumulative impact of proposals will be a major consideration.
- 4.59 **Policy SP04 Housing Spatial Distribution** asserts that from April 2018 to March 2036, the broad distribution of new additional housing provision will be 512 new homes in Hinterland Villages.
- 4.60 **Policy LP20 The Historic Environment** stipulates that regard should be given to the historic environment and take account of the contribution any designated or non-designated heritage asset makes to the character of the area and its sense of place. All designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance.
- 4.61 **Policy LP23 Sustainable Construction and Design** states that all new development is required to minimise its dependence on fossil fuels and to make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use. All new residential development is required to:
- a. Achieve reductions in CO2 emissions of 19% below for the Target Emissions Rate of the 2013 Edition of 2010 Building Regulations (Part L); and
  - b. Meet the higher water efficiency standards of 110 litres per person per day, as set out in building regulations part G2.
- 4.62 **Policy LP24 Design and Residential Amenity** asserts that all new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its context.
- 4.63 **Policy LP26 Flood Risk** states that all development should consider the impact of and promotion of design responses to flood risk, the availability of water and water infrastructure for the lifetime of the development.
- 4.64 **Policy LP27 Sustainable Drainage systems** stipulates that proposals for all new development will be required to submit schemes appropriate to the scale of development detailing how on-site drainage will be managed so as to not cause or exacerbate flooding elsewhere.
- 4.65 **Policy LP30 Safe, Sustainable and Active Transport** stipulates that all developments are to maximise the uptake in sustainable and active transport a transport hierarchy must be considered. This will prioritise the following modes of transport in order – walking, cycling, public transport and car sharing.

- 4.66 **LP31 Managing infrastructure provision** states that all new development must be supported by, and have good access to, all necessary infrastructure. Planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet the necessary infrastructure requirements arising from the proposed development.

## Felsham Conservation Area Appraisal

- 4.67 The Felsham Conservation Area Appraisal was published in 2010 and is a demonstration of 'quality of place', sufficient for briefing the Planning Officer when assessing proposed works in the area. The Appraisal mentions the Six Bells public house describing it as knapped flint with white brick detailing, dating from the early nineteenth century.
- 4.68 The village's buildings are very demonstrative of Suffolk's mixed palette of vernacular materials. The older domestic buildings are generally of timber-framed construction with applied lime render finish, occasionally with exposed timbers. Several of these occur as terraces of two or three dwellings that were each formerly a single three bay hall and parlour type house, dating from around 1600.
- 4.69 More recent buildings of the eighteenth and nineteenth centuries generally employ brick, either soft Suffolk Reds, or more prevalent here only four miles from Woolpit, the harder Suffolk White. One pair of cottages is built in Rat-trap bond, whilst others can be found in flint with brick dressings.
- 4.70 A similar mixture of materials can be found on roofs. The oldest buildings have straw thatch or clay pantiles and the later ones generally slates or pantiles, some of the latter the black glazed variety.
- 4.71 The more recent post-war infill is generally less appropriately built using mass produced bricks, cement render finishes and concrete roof tiles.

## Community Infrastructure Levy (CIL)

- 4.72 The Mid Suffolk Charging Schedule was adopted in 2016. Felsham is located within the 'High' zone with regards to CIL rates whereby CIL is charged at £115 per sqm + indexation.

## 5.0 Key Development Considerations

5.1 The following section of the Statement outlines why the proposed development is appropriate having regard to the planning policy context, as is set out in section 4 of the Statement, and any relevant technical considerations.

### Principle of Development

- 5.2 The Site lies within the defined settlement boundary for Felsham, as identified in the Core Strategy. Policy CS 1 identifies Felsham as a 'secondary village' where small-scale infill developments will be supported by the Council. The proposal for two detached dwellings, on an unused parcel of land, bounded on all sides by residential development, comprises small-scale infill development. Previous appeal decisions have supported the principle of developing the site.
- 5.3 Small-scale development is essential for ensuring the long-term viability of villages and their services. In this regard, the proposals will serve to bolster the existing facilities in the village (including the public house and post office) and therefore accord with Policy CS 1 and Paragraph 79 of the NPPF.
- 5.4 Paragraph 117 places primacy on the effective use of land. The Site currently sits unused, undermaintained and a financial burden on the public house. The proposals will see this area of land regenerated and made more attractive through a programme of sensitive development and effective landscaping.
- 5.5 Moreover, the proposals meet the tests set out in the NPPF with regards to sustainable development:

#### **Economic**

The proposed development retains the existing public house as a functioning business and community facility, such that the proposals will have no impact on the operation of the business.

The proposal includes the development of the existing beer garden and a portion of the pub's existing parking facilities which are considered to be surplus to requirements. The pub's current operators have expressed confidence that the proposed development will have no material impact on the operation or future viability of the existing public house.

Moreover, the dwellings will contribute to local housing stock and provide much-needed workflow to small, local builders and contractors.

### **Social**

The proposed development will ensure that the application site continues to provide a community facility (public house) for the local residents and will provide much-needed family homes that will help meet the local housing need.

### **Environmental**

The relationship between the proposed dwelling, the existing public house and neighbouring dwellings provides a sustainable approach, maximising the potential of the site and creating a mixed-use environment which helps to promote a sustainable community, as supported by Section 8 of the NPPF

Moreover, this Statement is accompanied by technical documents that confirm that there will be no significant adverse impacts on the surrounding environment, particularly with regards to Heritage Assets and existing trees (discussed further below).

## **Viability of the Public House**

- 5.6 The Six Bells public house, with its existing car park, outdoor seating area will be retained and continue to serve Felsham and the wider community. A large portion of grassed outdoor space is retained for the public house. The pub will retain the same number of parking spaces.
- 5.7 The proposed residential development on the land to the north of the public house will not adversely affect the economic viability of this business. Moreover, it is likely that the occupants of the proposed dwellings would be patrons of the Six Bells, bolster its viability and ensuring a strong customer base into the future.

## **Heritage**

- 5.8 A Heritage Statement, prepared by Roper Pressdee Heritage, is enclosed and should be read in conjunction with the Application.
- 5.9 In accordance with the NPPF, the Applicant is required to ascertain what constitutes the 'significance' of heritage assets. The level of detail provided should be proportionate to the importance of each heritage asset and no more than is sufficient to understand the potential impact that may arise from development proposals.
- 5.10 The Heritage Statement concludes that the proposals, in terms of design, scale and location, have ensured that the aesthetic and illustrative value of the identified heritage assets will be retained.
- 5.11 The identified heritage assets are:

- The Six Bells Public House (Grade II);
- The Church of St. Peter (Grade II\*);
- Church Cottage (Grade II); and
- Felsham Conservation Area

Each of these assets is discussed below:

**The Six Bells Public House**

- 5.12 The Heritage Statement concludes that: *“there will be no harm on the significance of the Grade II listed Six Bells”*. This conclusion has been corroborated by each appeal decision to date, in relation to proposals for houses to the rear.

**The Church of St. Peter**

- 5.13 The proposals were assessed on their potential to adversely impact on the Church of St. Peter and its aesthetic, historic and evidential value. The Heritage Statement concluded that: *“Where there is any potential for any inter-visibility, the proposed development will be largely heavily screened from the asset by the Six Bells, and thus the overall impact on the significance of the listed building is identified here as being neutral”* and *“the proposed development will therefore preserve the significance of the Grade II\* listed Church of St Peter”*.

**Church Cottage and Adjoining Cottage, Swallows Nest**

- 5.14 The value of Church Cottage and the Adjoining Cottage is primarily derived from its ‘group value’ or the positive impact it has on the other Grade Listed buildings in the vicinity.
- 5.15 The Heritage Statement states that: *“The proposed development is set back in the plot and is sufficiently removed from this listed building so as to have no impact on its significance or on its setting, insofar as it contributes to significance”* and concludes that: *“The group value with both the Six Bells and with the Church of St Peter will remain unscathed, and thus the significance of this Grade II listed building will remain unharmed, and thus will be preserved.”*

**Felsham Conservation Area**

- 5.16 The Property sits within the Felsham Conservation Area and the proposals have been assessed for the impact they may have upon the Conservation Area. It is highlighted that the site makes little contribution to the significance of the asset, although the scrubland and trees to the west of the Six Bells do provide some input to the overall verdant quality of the conservation area.
- 5.17 Previous applications and appeals on the site shed light on what would constitute an appropriate form of residential development. An appeal for two detached houses in 2011 (APP/W3520/A/11/2155965) – although dismissed because of harm to a historic boundary wall (which does not apply to the current scheme) – confirmed that the design and siting of those dwellings would not harm the conservation area. A subsequent appeal decision in 2022

also relating to two detached houses (APP/W3520/W/21/3289197) concluded that the houses would appear as a pair of large executive houses, with a bulky and cramped appearance at odds with the spaciouly arranged buildings in the vicinity. A recent application for two smaller houses as refused in 2023 because the dwellings and the car ports were considered cramped overlarge and to intrude in views into the site.

5.18 The design of the current scheme has sought to address the concerns of the previous appeal Inspector and the Council regarding the two most recent schemes. Starting with the criticism that the two schemes had the appearance of large executive houses, the current application proposes two much smaller dwellings (three bedrooms instead of four bedrooms) with reduced ground coverage, lower rooflines and a larger gap between the dwellings. Equally significantly, the detached car ports in front of the dwellings have been omitted.

5.19 The vernacular design of the houses reflects the architectural features found in Felsham, and traditional materials including painted render, clay tiles, timber casement windows and bargeboards, and brick chimneys. For comparison purposes, the current scheme, the refused 2023 scheme and the 2011 scheme are reproduced below, highlighting that the current scheme is smaller and more compact than both the earlier schemes.

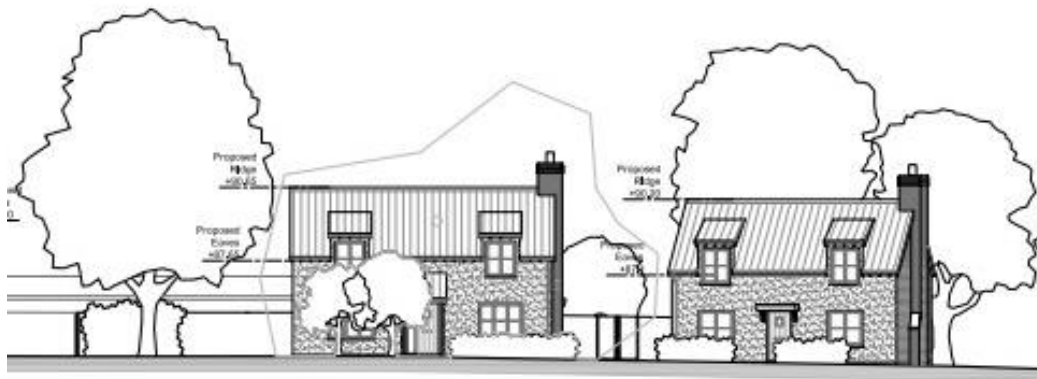


Image of the current scheme



Image of the 2023 refused scheme



Image of the 2011 scheme

5.20 Turning to the Inspector’s concern that the 2022 scheme was too bulky and cramped, and the Council’s similar concerns with the 2023 scheme, the revised scheme has a reduced height and massing. The image below highlights how much more compact the current scheme is compared with the 2022 and 2023 schemes, both in plan form and in elevation, with a greater separation between the houses.



Earlier 2023 site layout and elevations compared with the 2022 appeal scheme



Current scheme compared with the earlier 2023 scheme; note the loss of the car ports

- 5.21 On the basis of the substantial changes which have been made to the scheme, the Heritage Statement concludes that the reduced scheme “*preserves the special character and historic interest of the conservation area, thus removing any reasons for refusal in relation to heritage*”. As such, the proposals are considered to be in compliance with Policies cS2 and CS5 of the Core Strategy, and Policy LP20 of the emerging Joint local Plan.

### Residential Amenity

- 5.22 The proposals have been designed to ensure that there is no negative impact on the amenity of existing residents and the occupants of the proposed dwellings, as well as ensuring that there will be no conflict between the occupants and the public house.
- 5.23 The proposed houses are oriented approximately north-south, ensuring no overlooking of existing dwellings to the west and west. The 2022 appeal Inspector confirmed that there would be no overlooking of Maple Cottage directly to the west.



5.24 Each of the dwellings comfortably exceed the minimum National Space Standards, whilst each has a very generous-sized rear garden:

- Plot 1: 342 sqm
- Plot 2: 349 sqm

5.25 The dwellings will share the existing public house access, with granite setts delineating the start of the private drive beyond the pub car park. A dedicated pedestrian route is shown beside the access road, ensuring safe access on foot for future occupiers of the houses. A refuse collection point for residents is proposed adjacent to the pedestrian route and close to Church Road.

## Trees

5.26 An Arboricultural Impact Assessment and Method Statement (the “AIA”) is enclosed with the Application which addresses the environmental acceptability of the proposed development in terms of protecting retained trees and their root protection areas.

5.27 The Statement confirms that there are five Category B and five Category C trees on the site. All Category B trees would be retained, but part of a Category C group would be removed to create the access to the houses, with the report stating that the trees to be removed are either small in size, overshadowed by adjacent trees, declining, or are in a poor structural condition. They therefore have limited potential to reach full maturity as useful trees. The retention of larger and better quality trees to the east and west means that their removal will have limited implications for the locality.

5.28 A new access drive and car parking are indicated within the root protection areas of one tree and one group of trees, with the report commenting that the sub base for the for the surfacing materials will be a cellular confinement system, to reduce the need for significant excavation and excessive disturbance. A protective barrier will be installed to protect the trees. The risk of implications for the retained trees is likely to be low.

5.29 An Arboricultural Method Statement has been included within the report, which can be controlled by a planning condition. On this basis, the works proposed to trees within the site are deemed to be acceptable and not to cause harm to the setting of the conservation area.

## Ecology

5.30 An Ecological Appraisal Report has been prepared in support of the application, which comprises an initial ecological appraisal and bat activity surveys.

- 5.31 The report confirms that the majority of habitats and plant species observed on site are widespread and common, with negligible nature conservation value from a botanical perspective. The only ecological value is found in the mature and semi-mature trees, which should be retained and protected where possible. As noted above, the vast majority of trees are being retained, with only trees which are in poor condition being removed.
- 5.32 Most of the trees have negligible bat roost suitability, but nine mature and semi-mature trees were identified as having features that could be used by roosting bats such as broken limbs and crevices. Two bat activity surveys were undertaken, and no bats were observed emerging or re-entering trees. Trees should be retained where possible for sheltered foraging habitat for bats.
- 5.33 It is therefore concluded that local ecology will not be negatively impacted upon by the proposals.

### Contamination

- 5.34 A Desk Study has been undertaken by TEC, which incorporates a preliminary risk assessment and a preliminary geotechnical assessment.
- 5.35 The report concludes that the potential for significant pollutant linkages to be present is of a very low likelihood. Further investigation could be undertaken post-planning, which can be covered by a suitable planning condition.
- 5.36 The site therefore presents no contamination risks to future residents.

## 6.0 Design

- 6.1 The scheme has been designed having careful regard to the Felsham Conservation Area Appraisal, the conclusions of the 2011 and 2022 appeal Inspectors and the concerns raised on the earlier 2023 application, as well as a detailed analysis of the surrounding area.
- 6.2 The Conservation Area Appraisal identifies that traditionally, buildings in the village were constructed of lime render with thatched or clay pantile roofs, with later buildings being of brick and sometimes clay roofs. Examples of render and pantile buildings can be found just to the east of the application site on Church Road, whilst the Six Bells itself exhibit a mix of render and flint along with clay tiles and slates, and brick chimneys.
- 6.3 The traditional building form in Felsham is two storey pitched roof houses, with eaves generally oriented to face the road. Houses are generally set back from the road, sometimes by substantial amounts, with generous landscaping. Dwelling sizes vary between terraced cottages and substantial detached units.
- 6.4 Casement windows are the traditional type of window, though later buildings have sash and bow windows. Dormer windows are evident on some properties. Doorways have simple or no canopies.
- 6.5 Based on the above analysis, the scheme proposes a pair of detached two storey houses with pitched roofs, with a generous separation distance between the houses. The proposed houses will be 7.0 metres and 6.8 metres high respectively, which is modest in comparison with modern houses, and compares favourably with nearby traditional properties.
- 6.6 The houses will be faced in render, with clay pantile roofs and brick chimneys. Casement windows will be utilised, along with catslide dormers on the roof. Front doors will have simple timber canopies.
- 6.7 The proposed houses are considered to closely reflect the vernacular characteristics of Felsham, and to be well proportioned with a low roof profile. They will be set behind a retained tree belt, allowing only glimpsed views from Church Road. The houses will be visible from surrounding properties, but given their low profile and large plots, will not be unduly prominent.
- 6.8 The elevations of the proposed houses are reproduced overleaf.



Proposed front elevation of Plot 1



Proposed front elevation of Plot 2

## 7.0 Access

- 7.1 The Application is accompanied by a Transport Statement prepared by TPA.
- 7.2 The Transport Statement notes that the site is within walking distance of local amenities, and is served by a bus service. It also confirms that there have been no road traffic accidents in the vicinity of the site.
- 7.3 The development retains the existing access to the Six Bells from Church Road, which will be shared between the pub and the proposed houses. There will be just a handful of additional vehicle movements per day.
- 7.4 Edge of carriageway markings will be provided to assist drivers exiting the site, and vegetation to the west of the site will be cleared to improve visibility. As such, there will be a significant improvement in highway safety compared with the existing situation.
- 7.5 The Transport Statement notes that the proposed access arrangements are identical to the 2022 appeal scheme, which were found to be safe by the Inspector.
- 7.6 Parking standards for 4 bed dwellings are a minimum of three spaces per dwelling plus 0.25 visitor spaces per dwelling. The proposal therefore complies with the parking standards by proposing four spaces per dwelling. Two cycle spaces are provided per dwelling. A swept path analysis has been undertaken to demonstrate that cars can manoeuvre in and out of the residential spaces satisfactorily.
- 7.7 A refuse collection point is proposed close to Church Road, with a footpath link proposed between Church Road and the new houses, so that residents' bins can be collected from near the roadside.
- 7.8 14 parking spaces will be retained for the public house, albeit in a reconfigured layout. Pub deliveries will continue to be undertaken via the car park, with a swept path analysis demonstrating that a large delivery vehicle will be able to turn in the reconfigured car park.
- 7.9 The Statement concludes that: *"The Proposals are compliant with the relevant transport planning policies and would not result in a severe impact on the existing network. It is therefore considered that there are no highways and transport reasons for refusal of the planning application"*.

## 8.0 Conclusion

- 8.1 CPC has produced this Planning, Design and Access Statement in support of Cordage 44 Limited's resubmitted planning application in relation to the Six Bells public house.
- 8.2 The application proposes the erection of two dwellings on spare land to the rear of the public house.
- 8.3 This Statement and enclosed documentation demonstrate that the proposed development has been designed in accordance with the relevant local and national planning policies, and responds positively to the previous appeal decisions and local decision related to the Property.
- 8.4 Previous decisions have confirmed that there are no highway safety issues associated with sharing the public house access, no impact on the setting of the listed building, and that neighbours will not be adversely affected by the development. There have been no tree, ecological or contamination objections.
- 8.5 The only issue to be resolved is the impact of the proposed development on the Felsham Conservation Area. Both the 2022 appeal decision and the 2023 local decision raised concerns about the scale and massing of the proposed houses, and the consequent impact on the character of the conservation area.
- 8.6 The current scheme substantially reduces the scale of development compared with the 2022 and 2023 schemes. The dwellings are now three bed instead of four bed units, resulting in a much reduced footprint and height/massing, and furthermore the previously proposed car ports have been omitted, whilst the proposed design and materials closely follow the local vernacular.
- 8.7 It is therefore considered that the plans overcome the objections raised in the 2023 refusal, and that applying the planning balance in accordance with Paragraph 202 of the National Planning Policy Framework, planning permission should be granted for the development.