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CONTENTS

1. Introduction	2
Structure of the Statement.....	2
2. Site Description and Development Context	3
3. Planning Policy Assessment.....	5
4. Conclusion.....	12

1. Introduction

- 1.1 This planning statement has been produced by Chaplin Farrant Planning on behalf of Havebury Housing Partnership and relates to the comprehensive redevelopment of James Stiff Cottages, Rougham. The application is seeking to undertake significant changes to the existing development of fourteen properties and reduce these down to eight bungalows and three houses. The objective of these works is to increase the energy efficiency of the buildings and make them suitable for a wide range of tenants. It is important to emphasise that the scheme will remain a 100% affordable housing scheme. The development will utilise the existing access from Almhouse Road. Parking is to be provided to south of the dwellings. It is considered that the principle of development of this site has been established by its existing residential use.
- 1.2 It is important to note that Havebury Housing Partnership manage circa 7500 homes across the East of England. One of their objectives is a commitment to investing in existing homes and neighbourhoods. This application is seeking to meet this objective.
- 1.3 In preparing this application due regard has been given to Paragraph 78 of the National Planning Policy Framework which states that *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this”*.

Structure of the Statement

- 1.4 This Statement has been produced to assist West Suffolk Council (herein referred to as “the Council”) by assessing the proposed works in planning terms. This Statement is structured as follows:
- Section 2. provides a description of the Site and the development context;
 - Section 3. Planning Policy Context;
 - Section 4. presents the conclusion.

2. Site Description and Development Context

Existing Development

- 2.1 The existing development comprises 14 properties, consisting of 13 single person properties, communal facilities and a 3-bedroom wardens house, which forms a linear pattern of development which runs east to west across the site. To the south of the main access road there are 15 parking spaces. The most easterly of the existing bungalows is a modern extension to the more historic almshouses, which in turn is separated from the highway by a single detached garage.
- 2.2 To the west of the modern bungalow are traditional almshouses, incorporating brick detailing, ornate porches and stonework. To the west of the almshouses is a 1 ½ storey property and then a row of modern bungalows, which are joined to the houses by a single storey link. Apart from the traditional almshouses the remaining buildings are of little architectural merit and have become dilapidated and have poor energy efficiency rating/qualities. As stated the intention is to demolish the unused communal areas and remodel the existing buildings and reduce the number of dwellings from 14 to 11. At the current time only 3 of the properties are occupied and the remainder are empty.

Proposed development

- 2.3 The modern bungalow to the east of the almshouses will provide a 2 bedroom 61.7m² property which is excess of the 61m² nationally prescribed space standards. There are some minor changes proposed to the fenestration on the rear of the property and heating will be provided by way of an air source heat pump.
- 2.4 As detailed on the submitted plans the intention is to retain the traditional almshouses. The almshouses are to be upgraded to form 3 two-bedroom properties. The main changes to the properties involves the upgrading of the windows, internal alterations to provide improved living space, relocation of a rear door, removal of one of the rear windows and the provision of a condenser unit for the air source heat pump. The insulation and energy efficiency of the properties are to be increased. The floor area of these properties is 67.9m², which is clearly in excess of the 61m² minimum sought by the nationally described space standards.
- 2.5 The 1½ storey element is to be remodelled to form three dwellings. The two most easterly units are to provide one-bedroom units with ensuite facilities. The rear dormer window on each of the properties is to be enlarged, albeit there will be a greater amount of cladding. These properties are to be heated via air source heat pumps rather than oil powered heating. The internal arrangements of the properties are to be reconfigured and two of the ground floor windows on the rear elevation are to be removed. The floor area of the one bedroom properties are 63.6m², including storage, compared with the nationally described standard of 58m². The most westerly of the three houses will provide a three-bedroom dwelling which has a floor area of 92.7m² which is in excess of the minimum of 84m² of the nationally prescribed space standards.

- 2.6 The internal works to this property are less extensive and an air source heat pump will replace the oil powered heating. A boiler house on the rear of the building is to be removed and a laundry area which connects the two storey properties to the west is to be demolished.
- 2.7 The four bungalows are to be subject to the most extensive external changes with horizontal weather boarding being used to break up and provide interest to the front elevations to these properties. The dwellings are to be enhanced with more uniform glazing. An air source heat pump is to be provided to each property. The floor area of these properties is 39.2m² which is in excess of the 39m nationally prescribed standard.
- 2.8 All of the existing units perform very poorly in all aspects of energy efficiency and this proposal is seeking to address this along with improving the quality of accommodation on offer. All of the dwellings will be provided with enclosed private gardens. They will also be adaptable for a wide range of tenants in terms of age and abilities. A total of 17 car parking spaces are provided for both residents and visitors.

3. Planning Policy Assessment

3.1 As detailed below this application has been considered against the policies contained within the:

- Joint Development Management Policies Document
- National Planning Policy Framework

3.2 The policies of the Joint Development Management Policies Document are of particular relevance and have been focussed upon in the assessment of this development. It should also be noted that this application comprises the enhancement of an existing rather than new development.

Policy DM5: Development in the Countryside Areas

3.3 Whilst it is recognised that this site is somewhat divorced from Rougham, this is a historical situation and if this proposal was being considered as a brand new rural exception site it may have been assessed less favourably. The proposal is considered to accord with Policy DM5: Development in the Countryside Areas of the Joint Development Management Policies Document which advises that development designated as countryside will be protected from unsustainable development, with criterion b of this policy confirming that affordable housing for local needs is deemed to be an appropriate form of development in the countryside.

Policy DM29: Rural Housing Exception Sites in St Edmundsbury

3.4 This proposal has been assessed against Policy DM29: Rural Housing Exception Sites in St Edmundsbury and it is evident that the proposal complies with four of criteria pertaining to this policy, namely:

- a) the development will meet or assist in meeting a proven and specific need for affordable housing in the locality which could not otherwise be met;
- b) the development is on the edge of a Key Service Centre, Local Service Centre, or Infill Village and is well related to existing community services and facilities and sympathetic to the form and character of the settlement;
- c) the site is the most suitable to meet the identified need and, in particular, the need could not be met on any site which would better meet criterion b;
- d) the development will not negatively impact on biodiversity, geodiversity or the surrounding landscape character; and
- e) secure arrangements are made to ensure that initial and subsequent occupation of the dwellings can be restricted to those having an identified local need for affordable housing through the use of appropriate safeguards, including conditions or legal obligations.

- 3.5 It is recognised that whilst the scheme fulfils four of the criteria in Policy DM29, it is unable to meet criterion b which seeks that *“the development is on the edge of a Key Service Centre, Local Service Centre, or Infill Village and is well related to existing community services and facilities and sympathetic to the form and character of the settlement”*. However, there are existing and historical locational issues which prevent compliance with this criterion. There are also clear material considerations and benefits associated with this proposal which overcome the inability of this proposal to fully meet all of the requirements of Policy DM29: Rural Housing Exception Sites in St Edmundsbury.

Policy DM2: Creating Places - Development Principles and Local Distinctiveness

- 3.6 This scheme is seeking to achieve one of the main objectives of Havebury’s Corporate Plan 2023-2026, which states that *“Over the next three years, we will see active investment in identifying and upgrading our existing homes to meet future targets. We are starting from a good place – our average SAP score across all our homes is 71.04 compared to a 68 national average. Our ‘no-regrets, fabric first’ approach means that we will do our best to avoid investment in homes that might end up being superseded and needing to be replaced as we move from our 2030 target towards net zero carbon in 2050”*.
- 3.7 It is this move towards improving the energy efficiency of the properties which has resulted in significant alterations to them and a slight reduction in the amount of built development. This accords with criterion f of Policy DM2: Creating Places - Development Principles and Local Distinctiveness which states that developments should *“incorporate sustainable design and construction measures and energy efficiency measures as required by Policy DM7 of this Plan”*.

Policy DM7: Sustainable Design and Construction

- 3.8 Policy DM7: Sustainable Design and Construction reinforces the above by advising that *“All proposals for new development including the re-use or conversion of existing buildings will be expected to adhere to broad principles of sustainable design and construction and optimise energy efficiency through the use of design, layout, orientation, materials, insulation and construction techniques”* In addition to the changes to the design and fabric of the buildings electric vehicle charging points will be provided across the development.

Policy DM11: Protected Species

- 3.9 This planning application is accompanied by a Phase 1 Ecological Assessment and its recommendations have been incorporated into the development. The proposal is therefore considered to accord with the requirements of Policy DM11: Protected Species Development in that *“... suitable measures have been taken to: a. reduce disturbance to a minimum; and b. i. maintain the population identified on site; or ii. provide adequate alternative habitats to sustain at least the current levels of population. Where appropriate, the local planning authority will use planning conditions and/or planning obligations to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum”*.

Policy DM22: Residential Design

3.10 The proposal has also had due regards to Policy DM22: Residential Design which states that *“All residential development proposals should maintain or create a sense of place and/or character by:*

a) employing designs that are specific to the scheme, and which respond intelligently and appropriately to a clear brief articulated in a Design and Access Statement;

3.11 As detailed on the drawings accompanying this application, the houses have taken their design cues from the almshouses and incorporated brick detailing which creates interest and breaks up the elevations of the properties. In addition, Hardie® plank or Eternit Board, horizontal cladding is proposed on four of the bungalows to break up their bland front elevations.

b) basing design on an analysis of existing buildings, landscape or topography, and fully exploiting the opportunities that these present;

3.12 As outlined above the design of the scheme has responded to the character of the more historic buildings on the site. The existing trees on the western boundary of the site will screen the development from views to the west.

c) utilising the characteristics of the locality to create buildings and spaces that have a strong sense of place and distinctiveness, using an appropriate innovative design approach and incorporating a mix of housing and unit sizes that is appropriate for the location;

3.13 The linear form of the site somewhat limits the design of the scheme, although the changes to the external appearance of the properties has created a strong sense of place and distinctiveness. The internal changes to the existing dwellings will provide a mix of housing and unit sizes that is appropriate for the residents who will occupy the properties. It is important to advise at this juncture that existing residents will be given the opportunity to continue to occupy the development, during and after its completion.

d) creating or contributing to a coherent and legible place that is structured and articulated so that it is visually interesting and welcoming;

The changes to the scale and design of the dwelling has created a form of development which is visually pleasing and more welcoming.

e) creating and supporting continuity of built form and enclosure of spaces.

The proposal has sought to provide more clearly enclosed areas of private amenity spaces to each property.

3.14 Policy DM22 states that *“Residential development should be laid out to optimise amenity with streets and parking facilitating this primary objective. Therefore, in addition to the criteria above, development should”:*

f) where appropriate, apply innovative highways and parking measures designed to avoid the visual dominance of these elements in the design and layout of new developments, whilst still meeting highway safety standards;

3.15 The proposed change to the layout and size of the dwellings has allowed the parking to be retained with additional landscaping proposed to break up the views of the parking area when viewed from the south.

g) take opportunities for parking to support the street scene;

3.16 See response to f. above.

h) ensure appropriate levels of permeability and accessibility favouring sustainable transport routes and consider the needs of pedestrians and cyclists before car users;

3.17 The scheme has been designed to put the needs of pedestrians before car users.

i) integrate comfortably with surrounding street networks and enable integration into future additional development;

3.18 Due to the location of the development the proposal is not connected to surrounding street networks.

j) seek to create a safe and welcoming environment.

3.19 The layout of the scheme will ensure that public areas are overlooked and create a safe and welcoming environment. The provision of secure private amenity areas is another benefit to the proposed residents.

3.20 Policy DM22 advises that “*New dwellings should also be of a high architectural quality, meaning that*”:

k) they are fit for purpose and function well, providing adequate space, light and privacy;

3.21 The scheme is seeking to ensure that the dwellings are fit for purpose with particular attention being given to space, light and privacy.

l) they are adaptable in terms of lifetime changes and use;

3.22 Some of the dwellings already incorporate facilities for less able residents, whilst the others have been designed so that they can be readily adapted should the need arise.

m) they are well built and physically durable;

3.23 The proposed dwellings will be well built using a high quality and durable palette of materials.

n) they are the product of coherent and appropriate design principles.

- 3.24 As detailed the development proposals are unquestionably the product of coherent and appropriate design principles.
- 3.25 In the light of the above assessment the proposal unquestionably fulfils the criteria of Policy DM22: Residential Design.

Policy DM6: Flooding and Drainage

- 3.26 The site is situated in Flood Zone 1 and the application does not propose to change the means of surface water to foul drainage and as consequence the proposal is not considered to be in conflict with Policy DM6: Flooding and Sustainable Drainage Proposals.

Policy DM46: Parking Standards

- 3.27 As detailed above the application is seeking to retain the existing number of parking spaces which is reflective of the change in the level of occupancy of the refurbished dwellings. Due to the historic locational impacts of this site the latter part of Policy DM46: Parking Standards is of relevance which advises that “...*Exceptions may be made to parking standards in rural areas where satisfactory evidence and justification is included along with a Transport Assessment and/or Travel Plan that demonstrates why an exception ought to be made given the nature and location of the specific development proposal*” This policy states that “*All proposals for redevelopment, including changes of use, will be required to provide appropriately designed and sited car and cycle parking, plus make provision for emergency, delivery and service vehicles, in accordance with the adopted standards current at the time of the application*”.
- 3.28 In relation to this part of Policy DM46 the proposal makes provision for emergency, delivery and service vehicles and there will be adequate room within the rear amenity spaces of the dwellings to provide secure cycle storage.

Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity

- 3.29 As detailed this application has been accompanied by an ecological assessment which has concluded that the development of the site will have:
- No impacts on designated nature conservation sites.
 - No impacts on valued habitats.
 - No impact to bat roosts but a potential to disturb common/soprano pipistrelle commuting and foraging habits as a result of the lighting scheme for the new dwellings; to be mitigated by planning a wildlife-sensitive lighting scheme.
 - A possibility of minor impacts to a local hedgehog population; to be mitigated by precautionary working methods during the construction phase.

- A possibility of minor and temporary impacts on nesting birds; to be mitigated by sensitively timing the demolition and site clearance works or by using watching briefs to confirm nest absence.
 - No impacts on reptiles.
 - No impacts on amphibians including great crested newts.
 - Minor but proportionate wildlife enhancements for the new development are recommended in the form of two bat roost boxes and two sparrow nest boxes.
- 3.30 It is confirmed that the applicant is happy to accept the imposition of appropriately worded conditions to control and mitigate the impact of the development on wildlife.
- 3.31 The application is currently being assessed in relation to Biodiversity Net Gain and the results of this assessment will be submitted during the course of the consideration of this application. Initial assessments have indicated that a 10% BNG can be readily achieved.
- 3.32 As can be seen from the above the ecological enhancements and proposed works to secure a minimum of 10% BNG have demonstrated that the requirements of Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity have been met.
- Contribution to sustainable development based on economic, social and environmental objectives**
- 3.33 Paragraph 8 of the National Planning Policy Framework establishes that the purpose of the planning system is to contribute to the achievement of sustainable development, based on it performing economic, social and environmental objectives which should be sought jointly and simultaneously. The economic, social and environmental objectives are considered in more detail below.
- 3.34 This proposal would meet the social objectives by refurbishing an existing scheme which will bring much needed affordable housing to Rougham. The housing mix has been developed using data from the Councils Housing Strategy Team demonstrating that it meets local needs.
- 3.35 The environmental objectives associated with this scheme will involve the refurbishment of existing dwellings rather than their demolition and replacement. The scheme will result in the maintenance and enhancement of the existing habitat which will lead to landscaping and ecological benefits. The existing hedgerows and trees on the site will be retained and augmented as part of this development proposals and the implementation of a landscaping scheme will also result in bio-diversity and habitat enhancements.
- 3.36 The economic objectives of the scheme include benefits to the local economy through the upgrading and landscaping of the dwellings (i.e. work opportunities for local tradespeople), the servicing of the completed homes, and the consumer spending of prospective residents.

3.37 From the above it is clear that this application will achieve the social, economic and environmental objectives as advocated by paragraph 8 of the NPPF.

4. Conclusion

- 4.1 This Planning Statement has clearly demonstrated that the development proposals are fully in accordance with the policies contained within the West Suffolk Joint Development Management Policies Document . The housing scheme will unquestionably help to address a significant shortfall in the provision of affordable housing in West Suffolk by providing a range of house types.
- 4.2 The proposal will provide substantial social benefits in helping to increase the supply of energy efficient affordable housing. There would also be significant economic benefits to the local economy through the refurbishment of the dwellings, the servicing of the completed homes and the consumer spending of future residents. There would be limited environmental harm resulting from the development of this self-contained site which would be mitigated by landscaping and suitable habitat enhancement particularly in relation to the extensive areas of incidental open space provided within the development.
- 4.3 The development would constitute as a sustainable development by bringing undesirable units back into use. It is considered that the upgraded residential development on this site will help to increase the much-needed supply of affordable housing in an appropriate and sustainable way.
- 4.4 The existing access has adequate visibility splays at the junction of Almshouse Road. The access and parking arrangements are considered to be sufficient for the scale of the proposed development.
- 4.5 In view of the above, it is considered the scheme accords with both national and local policy and represents a suitable development proposal for the site that addresses all the relevant and material considerations. In this context, the proposal satisfies Section 38(6) of the Planning and Compulsory Purchase Act 2004 and it is considered that planning permission should be granted.

