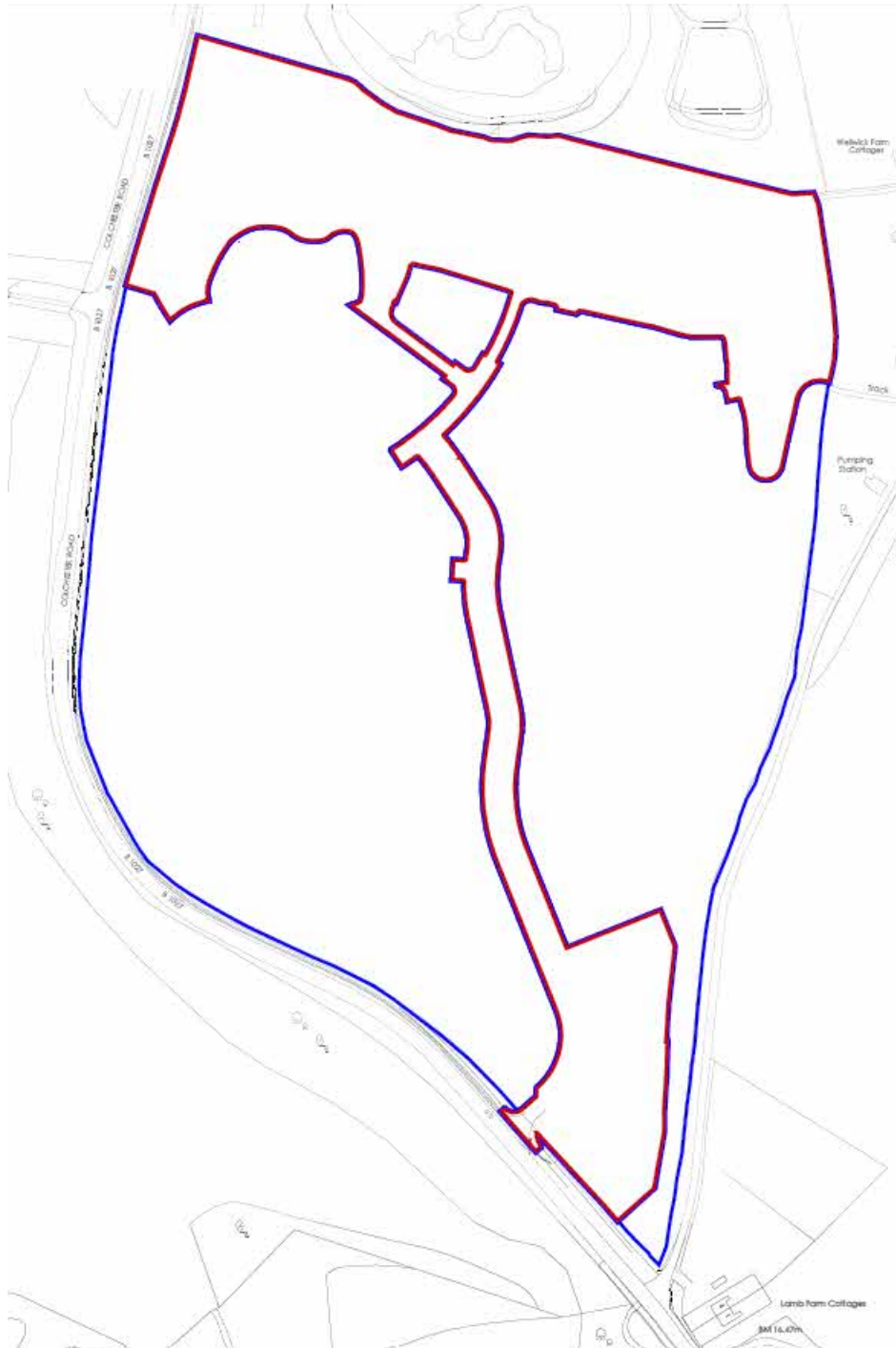


ST OSYTH ESTATE: WELLWICK SITE

Outline planning application for the erection of 37 dwellings; with all matters reserved other than the use of access from Colchester Road (as consented under 20/01124/OUT); associated public open space; landscaping and all associated ancillary works.

PLANNING, DESIGN & ACCESS STATEMENT APRIL 2024



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1. INTRODUCTION & BACKGROUND

- 1.1. A Design and Access Statement (DAS) is a short report accompanying a planning and/or listed building consent application to illustrate the process that has led to the development proposal, and to explain and justify the proposal in a structured way. The Government's Planning Practice Guidance (PPG) - which accompanies the National Planning Policy Framework (NPPF) - says that it is one of the ways in which good design can be achieved. The level of detail should be proportionate to the complexity of the application but should not be long. [Para 029 Reference ID: 14-029-20140306, PPG].
- 1.2. DAS's provide a framework to explain how the proposed development is a suitable response to the site and its setting and demonstrate that it can be adequately accessed by prospective users.
- 1.3. This DAS also doubles as a planning statement so is in essence a Planning, Design and Access Statement (PDAS). This is considered appropriate considering that development in the location sought has already been secured in principle.
- 1.4. This PDAS has been prepared by the Planning, Design and Heritage Team at City & Country in support of an outline application for 37 additional units at the Wellwick site, adjacent to the St Osyth Priory Estate.
- 1.5. Situated on the northeast side of the B1027 Colchester Road, and outside the historic park, Wellwick is part of the St Osyth estate and is a c. 16ha site dominated by a huge crater left behind following gravel extraction in the 1970s.
- 1.6. The site benefits from an implemented detailed planning consent, with the consented scheme serving as enabling development to help close the conservation deficit at St Osyth Priory and fund much needed restoration works.
- 1.7. The details of the relevant planning consents are summarised below in the Planning Background section of this PDAS.
- 1.8. The permitted works comprised a scheme of enabling development including bank stabilisation, an access road from Colchester Road, facilities for St Osyth's toxophily club (The Priory Bowmen) and a range of 190 residential units.
- 1.9. The archery club, situated to the north of the consented residential envelope, has found accommodation elsewhere in St Osyth so the area dedicated to this use is no longer required. We understand that they are happy in their alternative location do not intend to move location to the Wellwick site.
- 1.10. This application proposes to use that land for an additional 24 dwellings, plus deliver a further 13 dwellings to the south of the site near the site entrance, thus raising the total number on the Wellwick site to 227 dwellings in a mix of 2,3, 4 & 5 Bed homes. As such, outline consent for further enabling development is sought to provide additional funding for works to the historic assets on the St Osyth estate.

WHAT IS INCLUDED

- 1.11. As set out in Article 4 of Statutory Instrument 2013/1238 and PPG para 031, the following are covered in this DAS:
 - a) An explanation of the design principles and concepts applied to the proposals;
 - b) Demonstration of the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account. 'Context' is the particular characteristics of the application site and its wider setting which will be specific to the circumstances of an individual application;
 - c) Explanation of the approach to access and how relevant Local Plan policies have been taken into account;
 - d) Details of consultation undertaken in relation to access issues, and how it has informed the proposals; and,

- e) Details of how any specific issues which might affect access have been addressed.
 - f) Explanation of how any specific issues which might affect access to the building have been addressed.
- 1.12. The format of this DAS is derived from the CABE publication “Design and access statements: How to write, read and use them” (2006).
- 1.13. Additionally, this DAS also covers planning matters. It considers the enabling development case, planning history of the site, planning policy context and the planning assessment/considerations.

PLANNING BACKGROUND

- 1.14. Outline planning permission was granted on 18th March 2016, for the erection of 190 dwellings on 16.3 hectares of land; new junction and access roads; driveways; parking; footpaths; landscaping and all ancillary works; use of land as an archery range; construction of access drive and layout of parking area including siting of storage container for archery equipment. The proposals also allow for a new footway to be built along a section of Colchester Road, south of Wellwick (11/00333/OUT)
- 1.15. Reserved matters consent pursuant to 11/00333/OUT was secured on 1st July 2020 (18/01476/DETAIL). This consent was subsequently implemented, as confirmed by Tendring District Council (TDC).
- 1.16. A variation to the outline planning consent was then granted to vary Conditions 18 & 30 of the original permission to regularise the parameter plans (19/01171/OUT).
- 1.17. This was followed by a further Section 73 consent which allowed the variation of conditions 5, 6, 7, 8, 9, 10, 13, 14, 15, 16, 18, 19, 20, 21, 22, 23, 24, 25, 27 and 28 of 19/01171/OUT to allow for the discharge of such conditions in a phased manner (20/01124/OUT).
- 1.18. As described above, an Outline Planning Application for the redevelopment of the whole Wellwick site was granted in 2016 and in mid-July 2020, a completed layout was approved with full details. The approved masterplan is reproduced below.
- 1.19. The implemented detailed planning consent (18/01476/DETAIL) allocates the northern section of land to the archery club. This use is no longer required in this location and as such, a further 24 residential units are sought to the north of the consented residential envelope. Additionally, a further 13 units are proposed to the south of the site, along the southern/eastern edge of the main spine road, adjacent to the entrance. This proposal is explored and assessed throughout this PDAS.

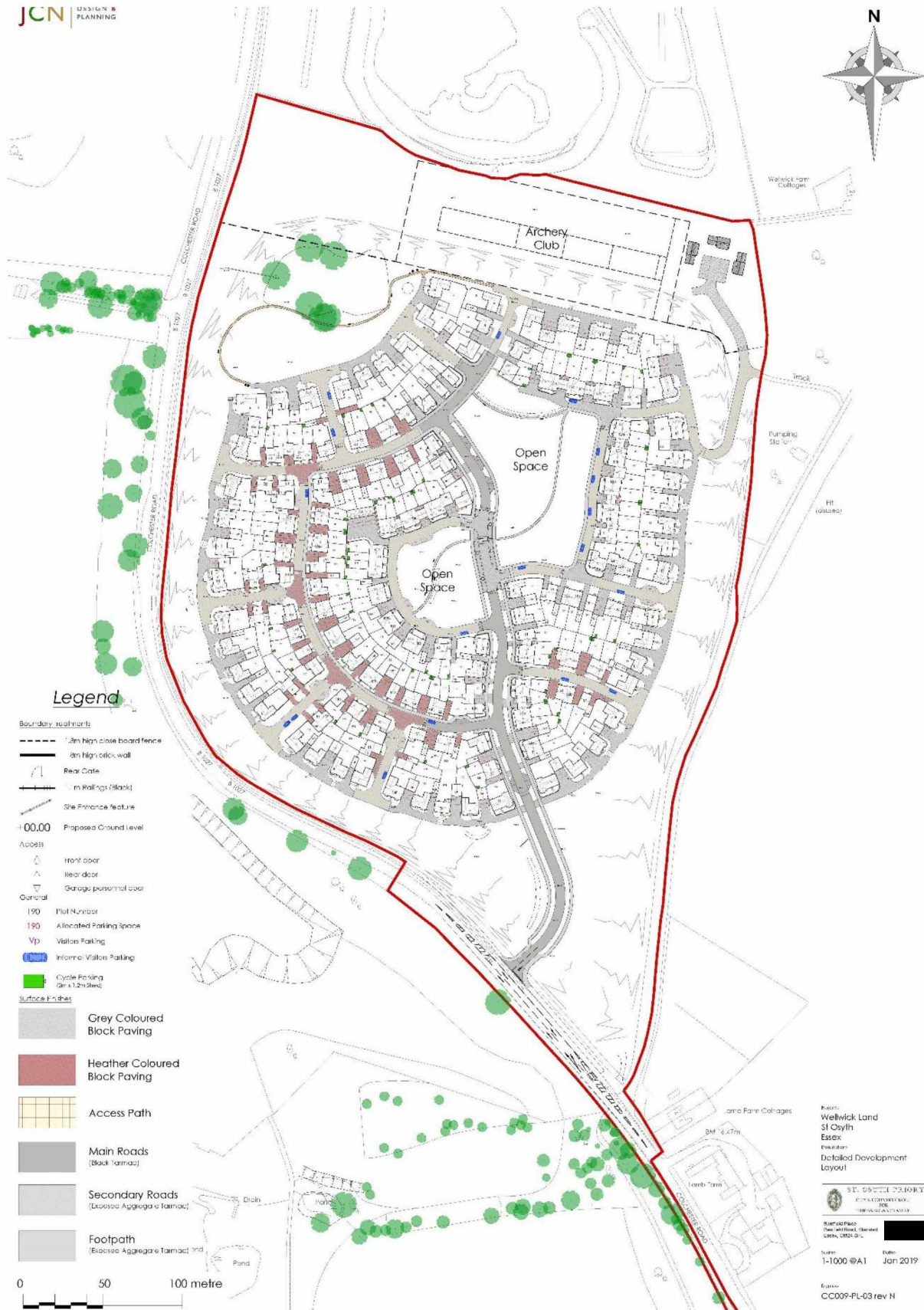


Figure 1 Consented Layout for 190 Units and Archery Club

ST OSYTH PRIORY AND ENABLING DEVELOPMENT NEED

- 1.20. Tendring District's most important single group of listed buildings is at St Osyth's Priory and its Registered Historic Park and Garden, as stated in TDC's Section 2 Local Plan (2013-2033). The St Osyth Priory Estate is unique owing to the exceptional range and diversity of its historic structures and its environmental and ecological features.
- 1.21. The buildings alone comprise 22 separate Grade I and Grade II * listed buildings (their grading placing them within the most significant 8% of all listed buildings), as well as a number of Scheduled Ancient Monuments, and the Registered Park and Garden.
- 1.22. The Estate is of such exceptional significance because it has a documented social and cultural history dating back over 900 years, with structures surviving from the monastic period. It has always been a place of high status making it truly of "special architectural and historic" interest as required for listing. The Priory precinct is a Scheduled Monument, and all its buildings are listed, several at Grade I and as a group with the Registered Park, well worthy of conservation i.e. care and protection so they can persist for the benefit of future generations.
- 1.23. The 2019 St Osyth Priory Business Plan (as amended) sets out the agreed vision for the Estate, with the overall aim to bring back into long term viable use the heritage assets at St Osyth Priory, as identified by TDC in the S106 Agreement (dated 14th March 2018). This is to be delivered whilst seeking to achieve the Council's goal of maximising public access and simultaneously addressing the conservation deficit associated with those assets -

Darcy House

The Gatehouse (completion of works)

Abbot's Tower, Chapel and 'Rivers Wall'

Brewhouse

West Barn

Tithe Barn, Cart Shed and Dairy

Rose Garden Walls

Crenellated Wall [Northern section of wall (with gate and windows) on the west side of the Bury]



Figure 2 Ariel photograph of St Osyth Priory Precinct

- 1.24. In conjunction with this, the commercial element of the overall scheme comprises three key business functions, as agreed in the 2019 Business Plan.

A Functions and Accommodation Offering: akin to a hotel. The core of this will be weddings and other functions held in Darcy House West (including Abbots Lodging) and the Tithe Barn, plus letting accommodation provided in other buildings.

A Visitor Attraction: This will be a combination of heritage attraction and country park, with an attractive retail, food and beverage offering.

A Holiday Cottages Offering: to make use of the environment and buildings when they are not booked for weddings and events.

- 1.25. A number of planning and listed building consent applications have been consented across the Estate to secure the key functions outlined above, and the intention remains that the whole estate will be managed as a single holistic entity to ensure the group value of the heritage assets are sustained and where possible enhanced.

The use of Darcy House east and south ranges as a wedding and events venue, including guest bedroom suites, has full planning and listed building consent (21/00799/FUL & 21/00798/LBC, as varied by 22/00662/LBC). Another key element of the functions offering is the creation of a visitor centre and a conference/functions/wedding reception use for the Tithe Barn, Cart Shed and Dairy (as consented under 14/01008/FUL & 14/01009/LBC).

The walled garden benefits from full planning approval and listed building consent to provide four holiday lets alongside a spa treatment facility (21/00839/FUL & 21/00838/LBC), contributing to the visitor attraction and holiday cottage offering.

To the southwest of the precinct area a mixed-use visitor destination is consented, comprising a café, farm shop, microbrewery, visitor centre and soft play (20/00719/FUL).

The majority of the holiday cottage offering across the Estate is formed by individual dwellings scattered around the parkland (19/00032/FUL) including Slip Cottages, Shell House, Pigeon House, Deer House, Nuns Hall, North Lodges and South Lodge. South Lodge is the first of these to reach completion, helping to set the precedent for the rest of the high-quality and unique holiday accommodation that will be delivered. Additionally, within the precinct area, the Gatehouse, Drying Shed (19/01523/FUL & 19/01524/LBC) and West Barn (20/00613/FUL & 20/00614) will also serve as holiday/event accommodation.

- 1.26. Various elements of the restoration works have already been secured through grant funding, but it has always been recognised that further enabling development will indeed be required.

- 1.27. The extensive restoration and conversion works to transform Darcy House into a wedding venue are partially complete, allowing for some weddings and other events to take place. The West Field new build development, located on the St Osyth Estate is very nearly completed and has been a successful case of consented enabling development in relation to the Priory working well in practice.

- 1.28. At a high level, the National Planning Policy Framework (NPPF) paragraph 208, reads *'Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.'* Key points are provided below specifically in relation to the need for enabling development at St Osyth Priory.

- 1.29. Historic England 'Enabling Development and Heritage Assets' Good Practice Guidance no.4 (June 2020) sets out that there are a number of situations where enabling development may be seen to be justifiable, notably (at paragraph 18), *'Repairing existing defects is an obvious part of securing the future conservation of the asset. Providing for the asset's maintenance thereafter and for the foreseeable future is a different but equally important concern, which may be achieved through finding the optimum viable and therefore sustainable use of the asset.'*

- 1.30. More specifically, paragraph 4.3 of the St Osyth Priory Business Plan sets out that *'Further enabling development will most definitely be required to meet the funding gap and the time constraints, as*

set out by the Council's Planning Committee Resolution, in September 2016; which would be for those assets within the schedule to be restored and back in beneficial use.'

- 1.31. It is envisaged that the additional enabling development proposed at Wellwick will primarily focus on funding further works to the Abbott's Lodgings. A viability assessment and calculations for the conservation deficient are provided in order to support this outline planning application for enabling development. Additional information to provide some narrative around this was also sent via email to Gary Guiver in February 2024.

THE APPLICATION

- 1.32. This enabling development application firstly deals with the section of the site on the northern boundary, where there is currently planning consent for an archery club. The land to the north is at a higher level and needs to be cut to bring it down to the same level as the approved detailed application. A landscaped area will be retained at the higher level providing a buffer between the new development and the existing holiday park on the neighbouring land to the north.
- 1.33. Secondly, this application seeks to agree the principle of an additional 13 units to the south of the parcel, providing an active frontage at the site entrance, along the spine road, before you reach the currently consented residential envelope. The properties will not be sunken as the properties to the north will be, but as the road progresses further into the site, the levels will slope downwards.
- 1.34. In principle, all the new houses will be of the same type as those deployed for the RM app, thus extending the approved layout using the same principles including for turning refuse vehicles and fire tenders.
- 1.35. Outline consent only is sought at this stage in order to secure the principle of residential development to the north of the already consented residential envelope.
- 1.36. Outline planning consent is sought for the erection of 37 dwellings; with all matters reserved other than the use of access from Colchester Road (as consented under 20/01124/OUT); associated public open space; landscaping and all associated ancillary works.
- 1.37. The following remaining matters are reserved for submission with the detailed planning consent -
- 'Appearance' - the aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.
 - 'Landscaping' - the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) n/a (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features;
 - 'Layout' - the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development.
 - 'Scale' - width and length of each building proposed within the development in relation to its surroundings.
- 1.38. As such an indicative outline masterplan has been prepared to demonstrate how the additional units could be accommodated within the area of the site previously set aside for the archery club and at the south of the site, with the detail reserved.
- 1.39. For avoidance of doubt, any areas shown in grey below are as consented under 18/01476/DETAIL, and remain unchanged. The red line boundary extends to include the consented access point connecting to the highway, Colchester Road. This access point was agreed through the outline consent for the wider scheme.



Figure 3 Proposed Indicative Layout

2. DESIGN & EVALUTION

PHYSICAL CONTEXT

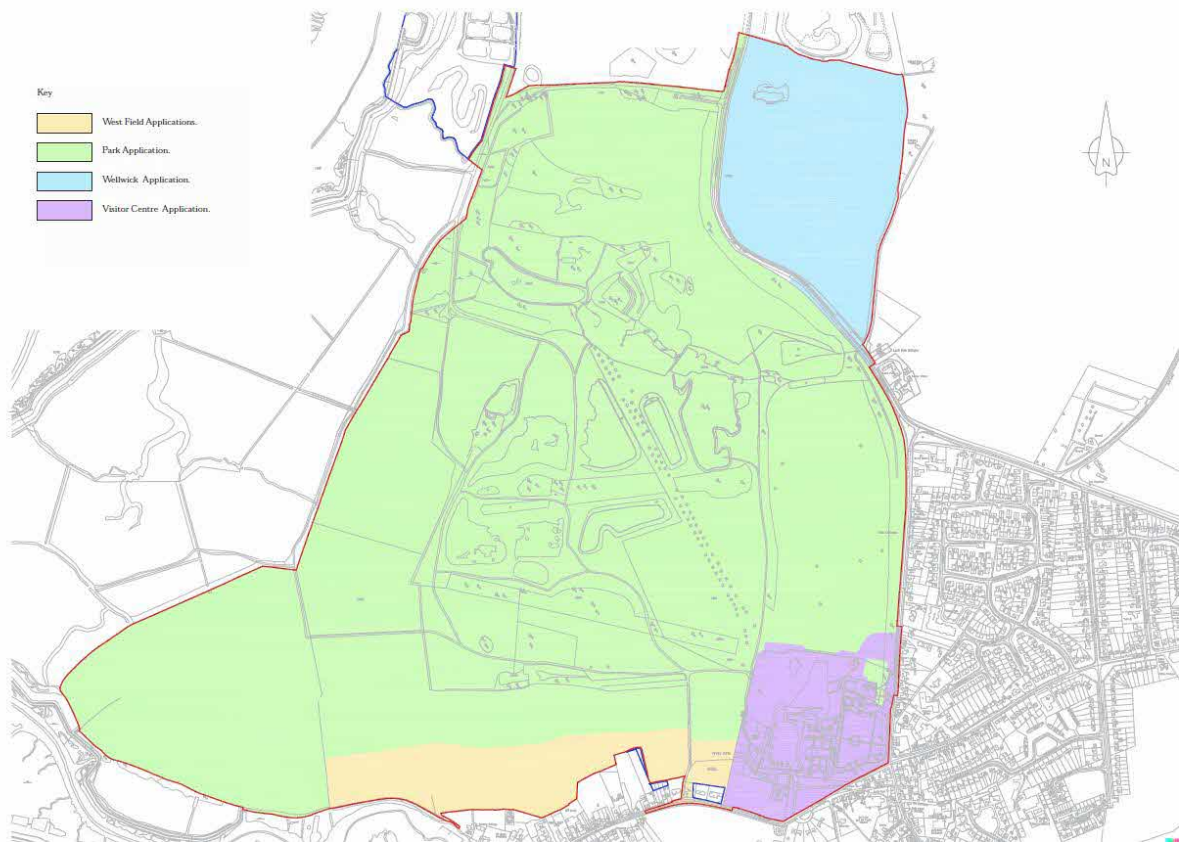


Figure 4 The wider setting of the site (shown in blue). St Osyth Priory park in green. Priory Precinct in purple

- 2.1. On entering St Osyth from the north on the B1027 Colchester Road, the Park presents a hedged boundary on the west side (Fig 4). The Wellwick hedges on the east side emphasise the rural feel but runs out into a layby where the B1027 Colchester Road turns south into St Osyth (Fig 5).



Figure 5 West hedge at access point



Figure 7 Colchester Road looking south to village access point



Figure 6 Aerial image of the Wellwick site showing Park to west, caravan site to north, farm to east



Figure 9 Looking SE from the NW corner of Wellwick

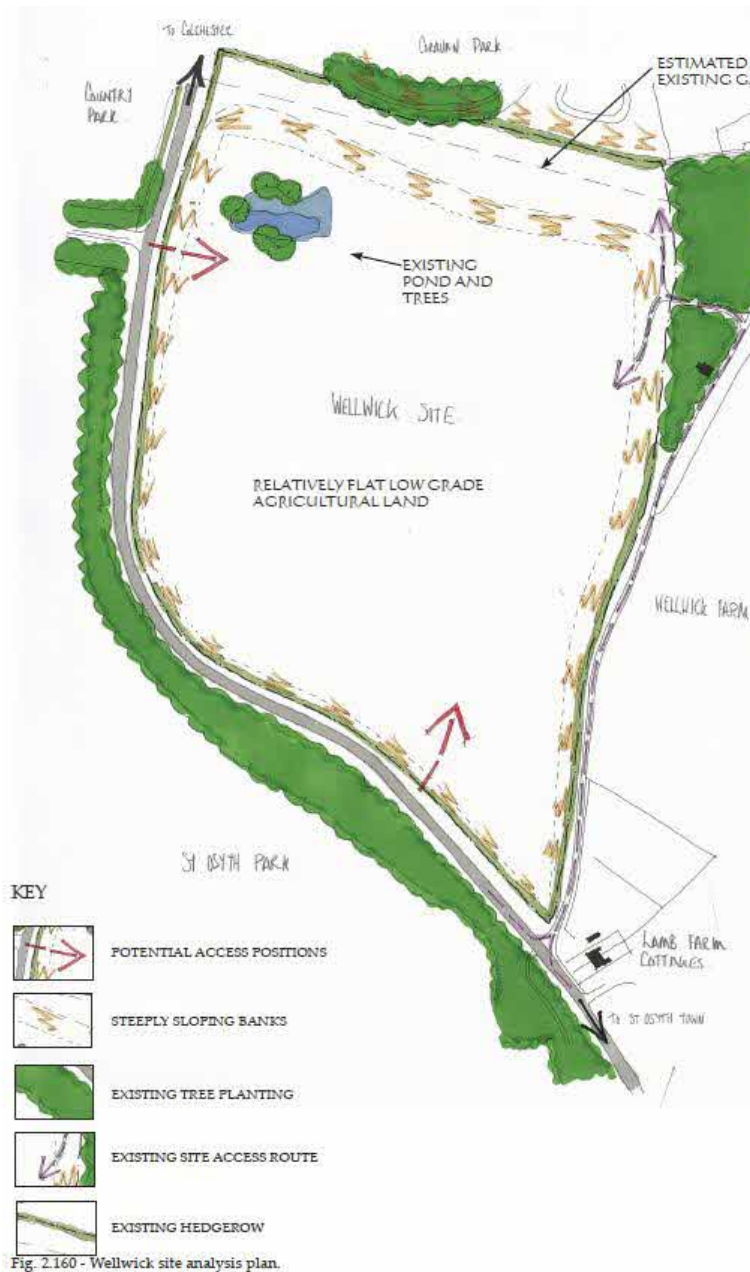


Figure 8 Site analysis

2.2. The immediate setting of the site is caravan park to the north, St Osyth park to the west and farmland to south and east. The Wellwick site comprises the north east of the Priory Estate and is separated from the Park by the Colchester Road. The application site of some 16 hectares is on the north side of Wellwick.

- 2.3. Topography. The site was quarried for gravel in the 1960s and 70s and the floor of the working has been back filled and levelled with washings from the plant making it clayey. It is still between 4m and 5m below the surrounding farmland with steep sided slopes and farmed as grassland.
- 2.4. Landscape. The Wellwick site as a whole is almost all grassland. It is hedged around and there is a small pond with trees in the NW. There are no buildings on site.
- 2.5. Heritage Significance. The site is not of heritage significance although it is opposite to the Park which is Grade II on the register of parks and gardens, so is part of its immediate setting.

HISTORY OF THE LANDSCAPE



Figure 10 1777 map of the Priory and setting



Figure 11 1896 OS map of north end of park and Wellwick site

- 2.6. As demonstrated by the 1896 map, the site was historically arable land and part of the outlying farms of the Priory estate before it was quarried in the 60s.

EVOLUTION OF DESIGN

- 2.7. Even though this is an outline design, the starting point was still the context appraisal and a reassessment of the principles and concepts developed for the extant permission for the Wellwick site. Detailed design is not to be agreed at this stage and as such this is a high-level design section.
- 2.8. This application deals with the section of the site on the northern boundary as well as to the south of the site, as clarified by the application red line boundary. The land to the north is at a higher level and will need to be cut to bring it down to the same level as the approved detailed application. This will minimise the visual impact of the additional properties as they will be less dominant within the wider landscape.
- 2.9. A landscaped area will be retained at the higher level providing a buffer between the new development and the existing holiday park on the neighbouring land to the north. Landscape effects – in particular on the historic landscape – and visual assessment has been key to the design process.
- 2.10. The proposed properties to the south, soon after the site entrance, will help create an attractive gateway to the development, whilst ensuring that high quality landscaping and ample POS can still comfortably be delivered.
- 2.11. A preliminary assessment was undertaken by Carden & Godfrey, the architects for the earliest options for the estate. A formal LVIA was later carried out by Liz Lake. As well as informing site selection and fine tuning of the positions and landscaping of the Park buildings and Visitor Centre, it was also fundamental in assessing the West Field setting issues. At Wellwick, it identified the work to be done in screening. With regard to the Wellwick, the LVIA identified that with good landscape proposals there would be no significant landscape or visual issues and the proposal is to carry forward the same approach.
- 2.12. This is further confirmed by an updated LVIA produced by Liz Lake Associates specifically in relation to the additional 37 units. It concludes that the site is considered to contribute in a limited way to the local landscape character and that the site is capable of accommodating development in line with that shown on the Illustrative Site Plan without causing material harm to the local landscape character or views and visual amenity of the area.
- 2.13. In principle, all the new houses will be of the same type as those deployed for the RM app, thus extending the approved layout using the same principles including for turning refuse and fire tenders. Although the layout itself is a reserved matter, the indicative layout shows that these principles can be successfully integrated amongst the additional units.
- 2.14. The storey heights parameter plan shows a maximum height of 14m and up to 3 storeys, as shown by Figure 12. It is proposed that the properties to the south are a maximum height of 2 storeys however as it is considered more appropriate as this area of the site will be more visible from Colchester Road.



Figure 12 Outline Storey Heights Plan

CONSTRAINTS AND OPPORTUNITIES

- 2.15. The results of the assessment of the site and the consultations with the Local authority have been evaluated.
- 2.16. Because the archery court is no longer needed, and given the work already carried out to prepare the site as a whole to fit into the local context, it seemed logical to give this final section over to housing particularly given the access can support additional units. Access is covered by Section 4 of this PDAS.
- 2.17. The Park and its setting, must be protected. Any re-use of Wellwick must have regard to its visual amenity.
- 2.18. The previously approved proposals allowed the creation of a high-quality, secure residential environment that is of sustainable design and construction yet increases the ability to maintain the Priory for future generations.
- 2.19. The assessment indicates that the land is not of historic importance nor is it of good quality for agriculture. Its edges are sensitive in that they add to the local network of hedged fields and should be protected but the interior can be developed. The existing pond should be protected, which is incorporated into the POS in the proposed scheme.
- 2.20. There is the opportunity to contribute to housing provision and the Priory enabling fund through a sensitive extension of the currently approved Wellwick scheme.
- 2.21. The proximity of neighbours, one the park, the other the caravan site, indicates the need for sensitive boundary treatments which can also be developed to increase local biodiversity.

3. PLANNING

PLANNING POLICY AND GUIDANCE

PLANNING CONTEXT

- 3.1. The planning history of the site is summarised by the Planning Background section of this PDAS, but in short, the Wellwick site benefits from an implemented detailed planning consent (18/01476/DETAIL), which allocates the northern section of land to the archery club.
- 3.2. As discussed, this use is no longer required in this location and as such, a further 24 residential units are sought to the north of the consented residential envelope. 12 residential dwellings are proposed to the south of the site.
- 3.3. For context, Wellwick is within Flood Zone 1 and therefore is at the lowest possible risk of flooding. The site does not lie within a conservation area, nor adjacent to one and does not contain any listed buildings, scheduled monuments or non-designated heritage assets.
- 3.4. The site does also not fall within any SSSIs, SPAs, RAMSARs, SACs and is also not within the green belt. Furthermore, it does not fall within a safeguarded sand/gravel area nor the coastal protection belt, as determined by the mapping for TDC's Section 2 Local Plan.
- 3.5. The northern portion of the site under consideration is unallocated in TDC's Section 2 Local Plan, as is the wider scheme. Residential enabling development in this location has however already been secured and this outline proposal follows suit.
- 3.6. The consented scheme for the site was granted as enabling development to fund crucial restoration works at St Osyth Priory. This outline planning application is also enabling development to boost the funding that the development site yields, realising greater public benefits to the St Osyth area and beyond.

NATIONAL PLANNING POLICY

- 3.7. The latest incarnation of the NPPF was published in December 2023 and accompanying guidance is set out by the Government in its Planning Practice Guidance (PPG).
- 3.8. Local policy should align to the overarching policies set out in the NPPF, but the key relevant policies are set out below.
- 3.9. Paragraph 8 of the NPPF -

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

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 well-designed, beautiful and safe places, 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 3.10. Paragraph 96 of the NPPF -

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

3.11. Paragraph 114 of the NPPF –

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

3.12. Paragraph 123 of the NPPF –

Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

3.13. Paragraph 128 of the NPPF –

Planning policies and decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places

3.14. Paragraph 135 of the NPPF –

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) 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.

3.15. Paragraph 65 of the NPPF -

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

3.16. Paragraph 196 of the NPPF -

In 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

3.17. Paragraph 214 of the NPPF -

Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.'

3.18. As a setting for a heritage asset, the previous DAS - and this one continues this process - considers Historic England's GPA2: "Managing Significance in Decision-Taking in the Historic Environment" (March 2015) and GPA3: "The Setting of Heritage Assets" (December 2017).

LOCAL PLANNING POLICY

3.19. Two main policy documents apply to this application, namely, the Tendring District Local Plan 2013-2033 and Beyond: Sections 1 and 2.

3.20. Enabling development is defined in the Section 2 Local Plan as *Development promoted primarily as a way of saving an important Listed Building, registered garden or scheduled monument that is neglected, dilapidated, or otherwise perceived to be "at risk". The term enabling development can also apply to development specifically designed to raise money to achieve other community benefits.*

3.21. The following local planning policies from the Section 1 LP are considered to be of relevance -

Policy SP1 - Presumption in favour of sustainable development

Policy SP2 - Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

Policy SP4 - Meeting housing needs

Policy SP6 - Infrastructure and connectivity

Policy SP7 - Place shaping principles

3.22. The following local planning policies from the Section 2 LP are considered to be of relevance –

Policy SPL2 - Settlement development boundaries

Policy SPL 3 - Sustainable design (more applicable to RM stage)

Policy HP 1 - Improving health and wellbeing

Policy HP 3 - Green infrastructure

Policy HP 5 - Open space, sports and recreation facilities

Policy LP 1 - Housing supply

Policy LP 2 - Housing choice (more applicable to RM stage)

Policy LP 3 - Housing density and standards (more applicable to RM stage)

Policy HP 4 - Housing Layout (more applicable to RM stage)

Policy LP 5 - Affordable Housing

Policy PPL 1 - Development and flood risk

Policy PPL 4 - Biodiversity and geodiversity

Policy PPL 5 - Water conservation, drainage and sewerage

Policy PPL 10 - Renewable energy generation and energy efficiency measures (more applicable to RM stage)

Policy CP 1 - Sustainable transport and accessibility

Policy DI 1 - Infrastructure delivery and impact mitigation

SUSTAINABILITY AND PUBLIC BENEFIT

3.23. The current proposals concern the extension of housing on a site already approved for this purpose. The principle of consenting enabling development in this location is therefore already established.

3.24. As well as adding to the local housing supply, the project will increase the enabling fund for the repair of the Priory buildings.

3.25. Section 2 of the NPPF sets out that sustainable development in the planning system has three overarching objectives, which are independent and need to be pursued in mutually supportive ways. Ultimately the purpose of the planning system is to contribute to the achievement of sustainable development.

3.26. The NPPF defines the three key overarching sustainability objectives as follows –

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 well-designed, beautiful and safe places, 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

3.27. It is also important to note that public benefits do not always have to be visible or accessible to the public in order to be genuine public benefits (Paragraph 020 of Historic Environment Guidance

PPG), for example a heritage benefit could be sustaining or enhancing the significance of a heritage asset and the contribution of its setting or securing the optimum viable use of a heritage asset in support of its long term conservation.

- 3.28. The public benefits that will already be generated from the consented Wellwick scheme will only be enhanced by an additional 37 new homes, particularly when considering the enabling development case, which will further serve to reduce the significant conservation deficit at the Priory, fund additional restoration works at the Priory, all helping open up the unique Estate to the public.
- 3.29. Housing need - The provision of additional units beyond those consented will provide further provision of high-quality new homes within Tendring District will also help to address the national housing shortage.
- 3.30. Green space, biodiversity and connectivity - The proposal development significantly increases the amount of publicly accessible space, which is discussed in further detail within this PDAS. This therefore provides opportunity for notable biodiversity enhancements (at least 10% biodiversity net gain), with diverse planting and areas created for new habitats to encourage native wildlife species. Attractive POS and walking routes to increase the site's permeability and connectivity will also encourage residents to spend more time outdoors in nature, serving to improve wellbeing alongside mental and physical health, as well as reaping environmental benefits. Its very close proximity to the Priory estate with its public will further encourage a healthy lifestyle for residents, improving quality of life.

In turn the healthy lifestyle that will be encouraged, as above, will reduce the burden on the NHS and other healthcare/ mental health services.

- 3.31. Energy efficiency - Although the detail on this point is reserved for the detailed planning submission, we are looking to deliver energy efficient new homes to include solar panels, high levels of insulation and air source heat pumps, to minimise the impact on the environment and reduce householder bills.

Delivery of high quality and energy efficient new housing to reduce householder bills will contribute towards reducing the NHS burden. Research from the BRE has calculated that poor quality housing costs the NHS £1.4bn a year. The health service spends £383m a year treating homeowners with illnesses related to cold living conditions.

We will also provide electric car charging points to encourage low carbon electric car travel.

- 3.32. Internal design - Again, the detail on this point is reserved for the detailed planning submission, but the houses will be carefully designed to encourage areas for home working and studying, reducing the need to travel to the office/workplace as frequently. This will not only reduce the number of likely vehicular journeys, but also improve work-life balance for new residents, providing social and environmental benefit.
- 3.33. Furthermore, some examples of the wider public benefits arising from the restoration and development at St Osyth Priory are provided below, which as highlighted throughout this document is very closely related and situated to the Wellwick land. Future residents will be able to realise these benefits directly. It is apparent that there will be significant local and immediate benefit, but also wider benefits to Tendring District and beyond.
- 3.34. The relationship to the wider sustainability objectives/pillars as defined by the NPPF are also considered.

Figure 13 Public Benefits of Restoration/Development at St Osyth Priory

| Public Benefit | Sustainability Objective (economic, social, environmental, heritage) |
|--|--|
| The enabling development will directly fund identified restoration works at St Osyth Priory, which is a collection of historic assets of both local and national importance, to put back into beneficial use to sustain them for future generations | Heritage & social |
| Reuse and repurpose of existing listed buildings to secure long term viable use | Environmental, economic & heritage |
| Boost to tourism & economy in local area & Tendring District following the restoration and opening up of St Osyth Priory & opening of visitor destination/events facilities | Economic & social |
| Increased visitors in the St Osyth area will in turn lead to additional spending and investment to local shops & services | Economic & social |
| Catalyst for regeneration, integration of historical landmarks will upgrade the quality and prosperity of the local area | Economic & social |
| A significant number of permanent jobs for local people will be created in areas such as hospitality, event management and retail, as the restoration works progress towards completion. | Economic & social |
| Generate local jobs in construction & trades throughout the build/supply chain process - St Osyth restoration works | Economic |
| The restoration works facilitate the Education Centre at the Priory, providing excellent opportunities for educational visits for local schools, the local community and other groups to engage in local history as well as participating in educational outdoor activities such as pond dipping and archaeological digs within the Registered Park and Garden. | Social |
| The opening up of the Priory to the public will build upon community cohesion and local opportunity, with celebrations held already for local school children for the Queen's Coronation and St Osyth Day within the Priory Chapel for members of the public to attend. Expansion will only follow as additional funds are secured to facilitate delivery of further restoration works. | Social |
| In conjunction with the works relating to the reuse and repurpose of the historic environment at the Priory, which in itself is more sustainable and environmentally friendly than new build, there will be great enhancement to the natural environment including the wider parkland with new tree planting, improvement of woodland and pasture for rare native breeds and wildlife to increase the ecological value of the estate and enhance biodiversity. | Environmental, heritage & social |

PLANNING ASSESSMENT

- 3.48. As summarised in the Planning Context section of this PDAS, the site is free from any statutory and non-statutory planning designations, and the minimal impact of the adjacent Registered Park and Garden and proximity to important listed buildings is considered within the Assessment-Physical Context section of this document.
- 3.49. Furthermore, the development site is located entirely within flood zone 1, which aligns to Policy PPL 1 of the Local Plan and Paragraph 130 of the NPPF, favouring development in areas of lower flood risk.

- 3.50. The LVIA produced by Liz Lake Associates concludes that the site is considered to contribute in a limited way to the local landscape character and that the outline proposals would not cause material harm to the local landscape character or views and visual amenity of the area.
- 3.51. Local Plan Policy HP 5 states a requirement for a minimum of 10% of the gross site area being open space. This is comfortably achieved with the consented scheme and the proposal for an additional 37 units serves to increase the amount of POS across the site by 1.14ha. This is due to the loss of the archery club, making more of the northern area of the site publicly accessible. When considering the proposals alongside the wider consented scheme, a total of 6.74ha of POS will be delivered (if including the banks) which is 43.5% of the total site area.
- 3.52. Policies HP 3 and 5 also emphasise the importance of green spaces. This links into Policy HP 1 which is focused on improving health and wellbeing, recognising the importance of contact with nature and access to open spaces in relation to wellbeing – this topic is explored further in the Sustainability and Public Benefits section of this PDAS.
- 3.53. The redesign of this area also supports policies relating to efficient use of land, whilst ensuring that development is sympathetic to the local area and well designed, such as paragraph 124 of the NPPF. Arguably, this is a much efficient use of the land, also yielding greater public benefits and increasing the amount of open space that is freely accessible.
- 3.54. As this is an enabling development scheme, there is no affordable housing proposed and therefore a conflict with Policy LP 5 is noted. This does however follow the approach taken with the wider scheme, which has consent for private dwellings only, with the enabling/viability case taking precedence.
- 3.55. As set out in the St Osyth Priory and the Enabling Development section of this PDAS, the need for further enabling funds in relation to St Osyth Priory is recognised by TDC and is clearly set out in the approved St Osyth Priory Business Plan (paragraph 4.3). At a national level, Historic England Guidance as well as the NPPF make the case for enabling development, with paragraph 208 of the NPPF asking if the *benefits from an enabling development proposal, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.*
- 3.56. The enabling development case should therefore be given more weight than this conflict, to ensure that enabling funds for St Osyth Priory are maximised, helping to further reduce the identified conservation deficit.
- 3.57. At the heart of the NPPF is a presumption in favour of sustainable development. It is considered that the three key overarching objectives of sustainability, as defined by Section 2, Paragraph 8 of the NPPF, are met and furthermore there are additional heritage related public benefits that are unique, significant, and directly relevant. Sustainability and public benefits from the additional development proposed at Wellwick in addition to the wider benefits from the enabling works at St Osyth Priory are explored in more detail in the Sustainability and Public Benefits section of the PDAS. These benefits should be given significant weight in considering the planning balance.
- 3.58. Although there is some limited conflict with the Local Plan, the benefits identified from the scheme delivery and associated enabling development restoration works at the Priory are considered to demonstrably outweigh this. Furthermore, the principle of development in this location is already established and the access point is already consented.
- 3.59. Regarding the practicalities of how the separate planning consents will interact, various conditions attached to the existing planning consent(s) can be tidied up via a Section 73 application in order to remove reference to the archery club, should this application be supported by TDC. This will ensure that there are two separate outline consents for the scheme which work together and do not conflict each other.

CONSULTATION AND INVOLVEMENT

- 3.84. We have engaged with both Tendring District Council and St Osyth Parish Council via consultation and discussion over several months.

- 3.85. Discussion regarding the proposals has taken place with Gary Guiver, Head of Planning at TDC. There were no obvious initial concerns highlighted and it was recognised that development in this location is already established. As such it was agreed that we would proceed to submit a new outline planning application to cover the additional 37 units proposed and that the planning case would be formally assessed by TDC throughout the planning process.
- 3.86. Furthermore, we also presented our initial proposal, concerning the 24 units to the north of the site, to St Osyth Parish Council in the Summer of 2023. We responded to various queries raised regarding the proposals and requested written feedback, but it was concluded that formalised comments would be provided by the Parish Council at planning consultation stage.
- 3.87. The need for additional enabling development in connection with St Osyth Priory was understood, alongside the fact that the principle of development in this location is established. The Parish Council are aware of our intention to submit an outline planning application for some additional new homes, and we will continue to engage with them throughout the outline planning process.
- 3.88. After consideration, it was concluded that wider public consultation was not necessary, given the circumstances. Notably the fact that residential development is already consented on the site, the lack of direct neighbours and the early engagement with the Parish Council.

4. ACCESS

ACCESS PROVISION

- 4.1. Access into the site, to the south-west corner has been designed and approved for the consented scheme.
- 4.2. The proposed scheme for the additional 37 dwellings makes use of the same access point, as depicted by the red line boundary for the outline consent sought. A highways note has been submitted in support of this planning application in order to confirm that the additional dwellings can comfortably be accommodated by the consented access.
- 4.3. The site location in terms of access to public transport and connectivity has already been assessed as part of the extant planning consent. The residential use was deemed acceptable in this location and as such this topic is not explored further within this document.
- 4.4. Therefore, there are no access constraints in respect of the additional development sought.
- 4.5. Details of parking provision will be provided with a detailed proposal submitted pursuant to the outline consent, but the indicative masterplan prepared demonstrates that both vehicular and cycle parking can comfortably be accommodated in line with local planning policy.

5. CONCLUSION

- 5.1. For the reasons set out in this PDAS, it is considered that an additional 37 dwellings further to the consented Wellwick scheme (190 dwellings) would be sustainable, proportionate and support a host of public benefits.
- 5.2. Like the consented scheme, this proposal would serve as enabling development to fund further restoration works at St Osyth Priory, Tendring District's most important single group of listed buildings. There is an identified and agreed need for such enabling development.
- 5.3. As set out in this PDAS, there are significant public benefits associated with the restoration and opening up of the Priory, which the future Wellwick and St Osyth residents will directly benefit from, as well as the District more widely and beyond.
- 5.4. Furthermore, the principle of development in this location is already established. An access is already consented that is capable of facilitating the further homes. 37 additional new homes would provide a beneficial and practical solution to the land now freed up by the archery club, all whilst increasing the amount of publicly accessible open space and increasing opportunity for biodiversity enhancement.