

# Planning Statement

**Sturmer Hall,  
Church Walk,  
Sturmer,  
Haverhill,  
CB9 7XD.**



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<b>Date of Application</b>	March 2026
<b>Local Planning Authority</b>	Braintree District Council
<b>Applicant</b>	Mr. Daniel Hannan
<b>Development Description</b>	Outline planning permission with all matters reserved except for access, for the change of use of Sturmer Hall to a Special Educational Needs and Disabilities (SEND) school for up to 120 young adults, including associated access arrangements
<b>Site Address</b>	Sturmer Hall, Church Walk, Sturmer, Haverhill, CB9 7XD.
<b>Our Reference</b>	25-42
<b>Report Revision</b>	V1.2

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## 1. Introduction

1.1. This Planning Statement has been prepared by Meadows Ltd on behalf of Mr Daniel Hannan (The Applicant) to accompany an outline planning application with all matters reserved except for access and change of use application for a Special Educational Needs and Disabilities (SEND) school for up to 120 young adults at Sturmer Hall, Church Walk, Sturmer, Haverhill, CB9 7XD.

1.2. The purpose of this statement is to:

- Set out the scope and vision of the proposal.
- Demonstrate compliance with the Braintree District Local Plan (adopted 2022) and the National Planning Policy Framework (NPPF) (2024)
- Present the compelling educational and social need for additional SEND provision in the district and wider region.
- Explain the community and sustainability benefits of the scheme.

1.3. The proposal represents an opportunity to deliver a transformative facility that directly responds to identified gaps in local and national SEND provision.



**Figure 1 – Extract from Concept Site Plan (Source: Agora Architects)**

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## 2. Development Description

### *Site and Context*

- 2.1. Sturmer Hall is a site with a long history and of varying uses. The site itself is accessed via Church Walk, a predominantly gravel roadway leading from the main A1017 road which leads to Haverhill to the north and towards Braintree in the south.
- 2.2. Church Walk provides an access point to a number of different sites and uses in addition to Sturmer Hall. These include Sturmer Garden Centre, a private dwelling and St Marys Church. Whilst the church is next door to the site, the proposals will not affect its current or future use.
- 2.3. The Sturmer Hall site contains a number of buildings. These include the main hall building itself, currently used as a hotel. There is also a complex of outbuildings that have been converted to form an entertainment venue, predominantly used for weddings but also used for other celebrations. There is also an area currently used as a service yard, which has grass bunds surrounding the area which provides an effective screen.
- 2.4. The predominant use of the site is for grounds associated with the current use as a hotel, either mown grass or areas of trees. There is also a large pond immediately to the south of the entertainment complex. Enclosing the site are boundaries with significant and established vegetation boundaries.

### *Site Designations*

- 2.5. The site is not attributed any direct designations (e.g. AONB, SSSI or SAC) that could immediately hinder development opportunity.
- 2.6. The site has a small area of Flood Zones 2 and 3 along its southern boundary leading from the main pond. None of the proposed new structures are proposed within or immediately adjacent to these areas and therefore it is considered not to have an impact on these proposals.
- 2.7. In addition, Sturmer Hall and part of its grounds are identified as a Scheduled Monument. As this application is outline, details regarding the Hall itself are limited to a change of use to office space only. Any physical changes (if required) would be shown in any follow up Reserved Matters application).
- 2.8. The listing description taken from the Historic England entry is as follows:

*"Sturmer is first noted in the epic poem 'The Battle of Maldon' of c.1000 AD as Sturmere, interpreted as meaning a lake formed by the river Stour. In the Domesday Book of 1086 the manor is recorded as having a mill and beehives. Sited approximately 1 km west of the River Stour, the site of the hall, in close proximity to the C11 and later Church of St Mary, is very likely to be that of the Domesday Manor.*

*The buried archaeological remains of the former buildings within the moated enclosure, the remains of the moat itself and putative mill to the south were scheduled as an ancient monument in 1995 from documentary and earthwork evidence, but there has been no archaeological*

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*evaluation of the buried deposits. The historic Ordnance Survey (OS) map of 1881 indicates that the south, east and western half of the moat's ditches were backfilled by this date and the southern area of the central building platform was in use as a garden. The platform may have been levelled to assist the landscaping. To the south, the map shows the main mill pond defined to the east by a dam, to the east of which is a linear pond interpreted as the remains of a tail race. This arrangement is depicted in the 1959 OS map. The main pond remains to this day; an island has been constructed and a brick culvert uncovered at the west end. The tail race has been infilled, but a concrete lined culvert within a small copse of trees at the east edge of the pond allows water into the stream which flows eastwards.*

*The monument is formed by two separate scheduled areas of protection. The northern scheduled area contains the remains of the moated site which has maximum dimensions of 78m north-south and 65m east-west. The northern arm and north-west corner of the moat remain visible as an earthwork with waterfilled ditches measuring a maximum of 12m in width. The moat arms to the east, west and south have been infilled and are no longer visible on the ground but are preserved as buried features. The existing Hall is sited in the northern part of the central platform.*

*The southern scheduled area lies approximately 35m south of the moated site. It contains the remains of a mill complex comprising a mill pond which remains waterfilled, and a dam and tail race to the east which survive as buried archaeological features. A stream running east-west feeds the pond through a brick culvert at the western edge. The mill pond is sub-rectangular measuring approximately 70m east-west by a maximum of 50m north-south and is defined to the east by the dam. The tail race survived as a pond measuring approximately 30m by 5m until the 1990s, but is backfilled and survives as a buried archaeological feature. A C20 concrete lined culvert allows the eastward flow of water from the main pond. The position of the mill site, leats and channel sluice gate is not visible at ground level, but will be preserved as buried features within the scheduled area.*

### Exclusions

*Excluded from the scheduling are all standing buildings and structures, including all modern road surfaces, footpaths and paved garden areas, although the land beneath them is included, and fencing."*

- 2.9. It is proposed that the construction of all new buildings would be outside of the "protected" area as identified the Historic England map extract shown below.

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**Figure 2: Extract from Historic England mapping showing extent of Scheduled Monument area (Source: Historic England)**

2.10. In addition, the "Parish Church of St Mary The Virgin" is listed Grade I by Historic England. These proposals do not affect the building itself, nor its setting. The Church is outside the parameters of the application site and will continue in its current use.

### ***The Proposal***

2.11. The vision is to deliver a purpose-built SEND school and transitional accommodation that blends education, therapeutic support and community integration.

2.12. The main key features of the proposals are as follows:

- A SEND school for up to 120 young adults aged 16-25.
- Forest school principles underpinning the design, drawing on restorative qualities of nature.
- Hydro spa facilities for therapeutic use by pupils and available to the community outside school hours, promoting integration and financial sustainability.

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- Residential accommodation to act as a stepping-stone between supported education and independent living.
  - A curriculum focused on independence, life skills and social integration, including training in cooking, budgeting and personal care.
- 2.13. The vision for this project is to establish a calm and nurturing environment where pupils with SEND can thrive. With excellent access to both public footpaths and highways, the school will also be well-connected to its community, ensuring inclusivity and ease of access for families, staff, and visitors.
- 2.14. The importance of delivering new SEND schools is widely recognised. Recent evidence published by UK Parliament in January 2025 has highlighted the scale of the challenge:
- "The system to support children and young people with special educational needs (SEN) in England is reaching, or, arguably, has already reached, crisis point... In 2023, the Department estimated that national demand for state special school places exceeded capacity by at least 4,000 pupils, with 63% of schools over-capacity and supporting 9,500 extra pupils."*
- 2.15. This proposal seeks to respond positively to that urgent need by providing a purpose-built facility that not only expands capacity but also sets out to redefine what a SEND school can be: inclusive, sustainable, and deeply connected to its landscape. The result will be a school designed around the needs of its pupils, creating opportunities for improved learning outcomes, smoother transitions into adulthood, and a supportive environment that gives every child and young adult the best chance to succeed.
- 2.16. The accommodation will provide a safe and nurturing setting where residents can begin to develop the skills, routines, and confidence required for greater independence. With structured support in place, the focus will be on fostering self-reliance, social interaction, and life skills such as cooking, budgeting, and personal care. Importantly, the accommodation will encourage integration with both the school and the wider community, helping young adults to prepare for further education, employment, or independent living opportunities.
- 2.17. By bridging the gap between education and adulthood, this element of the proposal ensures that pupils are not only supported during their school years but are also given a clear and practical pathway into adult life—empowering them to thrive beyond the classroom and within society.

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### 3. Relevant Planning History

- 3.1. A search of the Braintree District Council’s online planning records identified two previous planning applications on this site in recent years.
- 3.2. A search of the immediate surrounding area was also carried out and whilst this identified a number of planning applications, as most of them were either householder applications or for other uses, none of them were considered relevant to the proposals on this site.
- 3.3. Below are the applications that were identified on the site itself:

<b>Application Reference Number</b>	<b>Description of Development</b>	<b>Decision</b>
97/01416/FUL	Construction of 2no. barns and associated farm buildings to replace demolished buildings	Approved
03/00230/FUL	Construction of 2no. barns and associated farm buildings to replace demolished buildings – Renewal of application number 97/01416/FUL	Approved



**Figure 3: CGI Image of the Main S.E.N.D. Concept Building (Source: Agora Architects)**

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## 4. Planning Policy Context

### *Introduction*

4.1. In making this application, consideration has been made of relevant local and national planning policy and guidance.

### *Local Planning Policy*

4.2. The site is located within Braintree District Council; as such any development must account for the development strategies and plans in place. Therefore, the relevant local plan consists of the Braintree District Local Plan 2013 - 2033 Sections 1 and 2 adopted in 2022.

### *Braintree District Local Plan*

4.3. The following policies are taken from the shared strategic section with Colchester and Tendring:

- SP7 Place Shaping – new development should create high quality places that reflect character and sustainability.

4.4. The following “Braintree specific” policies are of particular relevance in the determination of this proposal:

- LPP33 Specialist Housing
- LPP43 Parking Provision
- LPP47 Built and Historic Environment
- LPP52 Layout and Design of Development
- LPP57 Heritage Assets and their Settings
- LPP60 Educational Establishments
- LPP61 Local Community Services and Facilities
- LPP63 Natural Environment and Green Infrastructure
- LPP66 Protection, Enhancement, Management and Monitoring of Biodiversity
- LPP67 Landscape Character and Features
- LPP74 Flooding Risk and Surface Water Drainage
- LPP75 Surface Water Management Plan
- LPP76 Sustainable Urban Drainage Systems

### *National Planning Policy Framework*

4.5. The National Planning Policy Framework (NPPF) 2024 and National Planning Practice Guidance are both material planning considerations. The NPPF sets out the Government’s planning policies

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for England and how these are expected to be applied while the NPPG sets out Government guidance in relation to planning related issues in England.

### 4.6. The relevant sections from the National Planning Policy Framework include:

NPPF 02: Achieving sustainable development.

NPPF 04: Decision-making.

NPPF 08: Promoting healthy and safe communities.

NPPF 11: Making effective use of land

NPPF 12: Achieving well-designed places.

NPPF 15: Conserving and enhancing the natural environment.

NPPF16: Conserving and enhancing the historic environment.

### 4.7. The key relevant paragraphs in the NPPF are as follows:

- Paragraph 8 - the NPPF sets out that planning should achieve sustainable development by balancing social, economic and environmental objectives.
- Paragraph 8(b) – the need to support strong, vibrant and healthy communities by ensuring a sufficient range of services, including education.

### 4.8. Whilst not specifically relevant to SEND schools, paragraph 100 of the NPPF states the following regarding the general provision of educational facilities:

*It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

*(a) give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and*

*(b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted*

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## 5. Assessment of Planning Policy

### *Principle of Development*

5.1. Sturmer Hall is situated to the west of the main village of Sturmer which is recognised as a “Third Tier” settlement as per the Local Plan. This is defined as an “other village which has a development boundary”. As such, the proposal’s accordance with the criteria for this is set out as follows:

- 1) The site is considered brownfield development which, whilst different from conventional brownfield sites in that there has been no industrial use previously, is similar in nature in terms of using under-utilised land and ensures that the new development relates well to existing buildings. The site benefits from direct access to a highway.
- 2) The proposal is for a SEND school that is commensurate with the size of the site to ensure adequate provision of amenity and a scale which conforms with that of the existing wider settlement. Whilst at outline stage, the intention is to deliver a development which complements the existing architectural vernacular of the immediate surrounds and the village.
- 3) Whilst at outline stage, the design will ensure the development contributes to enhancing the historic nature and connectivity of communities.
- 4) The site is not considered a visually important gap within the countryside as it is not visible from the highway and doesn’t make a significant contribution to the character and distinctiveness of the village’s surrounding landscape. It is well screened by existing and established vegetation which will be retained.

### *Local Plan Policy Considerations*

5.2. It is clear that the Local Plan does not provide comprehensive planning policy for proposals for new SEND schools. The policies listed previously are considered relevant or part relevant and in some cases only certain elements of the policy can be attributed to the site.

5.3. Policy LP33 Specialist Housing does not relate directly to accommodation at SEND schools. However, it does provide support specifically for “young or vulnerable adults” who require specialist accommodation. The proposals for this site will provide specialist accommodation facilities.

5.4. Policy LPP47 states that the Council will promote and secure a high standard of design and layout in all new development which protects and enhances the historic environment. Whilst these proposals are in outline at this stage, it is clear the design of the new buildings and their location on the site have taken into consideration the historic setting.

5.5. Policy LPP60 provides guidance on proposed educational establishments. Unfortunately, the guidance does not extend to SEND schools. Nevertheless, the policy states that the Council will support appropriate and well-designed proposals for new school and education facilities in sustainable locations on sites of a sufficient size to accommodate the range of facilities required.

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- 5.6. As the accompanying indicative site plan shows, the site has enough space to accommodate the required facilities without adversely impacting on the existing land uses.
- 5.7. Policy LPP61 addresses local community services and facilities. This policy states that the provision of new or enhance community facilities will be supported. Whilst the final details of the hydro provision will be confirmed in a follow up reserved matters application, it is proposed that local people will be able to access these facilities outside of the school's normal opening hours.
- 5.8. Considering the above justifications, we believe the proposal is on accordance with the relevant policies set out in the Local Plan.

### ***National Planning Policy Framework (2024)***

- 5.9. In Paragraph 10 of the NPPF states 'so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development'. Paragraph 8 of the NPPF sets out three dimensions to sustainable development:
- Economic – helping to build a strong, responsive and competitive economy.
  - Social - supporting strong, vibrant and healthy communities.
  - Environmental - contributing to protecting and enhancing our natural, built and historic environment.
- 5.10. The economic aspect of the policy states: "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". The proposed development will help contribute to the SEND school provision in Sturmer and the wider area, as well as aid in supporting local services and the fostering of a rural community.
- 5.11. The social aspect of the policy states: "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". The proposed development will improve the SEND school provision and is designed in a way that is in-keeping with the character of the village.
- 5.12. The environmental aspect of the policy states: "*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*". The site has no protections or designations which would render the development immediately unacceptable. The development makes effective use of an otherwise underutilised site and incorporates soft landscaping to enhance the biodiversity and natural environment on site. The developers have a responsibility to undertake development that minimises waste and pollution and which aligns with climate and carbon targets.

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5.13. These objectives are interdependent and need to be pursued in mutually supportive ways so opportunities can be taken to secure net gains across each. Paragraph 9 states that these are not criteria against which every decision can or should be judged; policies and decisions should play an active role in guiding development to sustainable solutions but should also take into account local circumstances to reflect the character, needs and opportunities of each area. At paragraph 39, it is highlighted that local planning authorities should approach decisions in a positive and creative way; working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area is recommended.

### *Other Material Planning Considerations and Planning Balance*

5.14. We have sought to assess the proposal in relation to the circumstances that the Local Plan is considered up to date.

5.15. The benefits of the scheme can be summarised as follows:

The site is located in a highly sustainable location adjacent to other residential development and with good transport links via the A1017 road and the nearby town of Haverhill.

The proposal will provide for much needed SEND school facilities. This means that there is the potential for the school to employ staff and families of attendees who can help support a variety of local facilities and services (for example shops, public transport and businesses).

The proposed development provides temporary employment opportunities for builders and trades, taxation income from land sale and property purchase, as well as the opportunity to provide for employment through the school and supporting businesses.

5.16. The development may be of some detriment to the environmental and ecological health of the site, but this has been considered as part of the Ecological Appraisal which sets out potential enhancement opportunities. The plans also demonstrate that soft landscaping will take place to create new habitats as well as planting, so most environmental harm will be short-term. The development will have a minor impact on the landscape and character of the area, however the site itself is screened off from the road and nearby public rights of way by hedgerows and trees. The proposed development has been identified to have low scale impact on habitat and protected species. The proposal would be acceptable in relation to biodiversity impact with the proposed mitigation and enhancement measures implemented. On this basis we believe that the benefits outweigh the harm.

5.17. It is therefore considered that whilst the site is not within a settlement boundary, it does provide exceptional benefits when considered against the chronic need for such facilities, together with employment opportunities and business opportunities for support services and their families.

## 6. The Need for SEND School Provision

6.1. This has been briefly highlighted elsewhere in this statement. However, it cannot be overstated the importance of delivering new SEND schools is widely recognised. Recent evidence published by UK Parliament in January 2025 has highlighted the scale of the challenge:

*"The system to support children and young people with special educational needs (SEN) in England is reaching, or, arguably, has already reached, crisis point... In 2023, the Department estimated that national demand for state special school places exceeded capacity by at least 4,000 pupils, with 63% of schools over-capacity and supporting 9,500 extra pupils."*

6.2. This proposal seeks to respond positively to that urgent need by providing a purpose-built facility that not only expands capacity but also sets out to redefine what a SEND school can be: inclusive, sustainable, and deeply connected to its landscape. The result will be a school designed around the needs of its pupils, creating opportunities for improved learning outcomes, smoother transitions into adulthood, and a supportive environment that gives every child and young adult the best chance to succeed.

### **Local Context**

6.3. In Essex and West Suffolk, it is widely known that existing special schools are oversubscribed, with parents facing long commutes and a lack of post 16-19 opportunities.

6.4. The following is the current situation:

- Edith Borthwick School (Braintree): recently expanded but continues to operate at full capacity with a long waiting list.
- Lexden Springs School (Colchester): newly built in 2021 but demand already outstrips the number of places.
- Southview School (Witham): this school focuses on physical disabilities but does not offer transitional accommodation.
- Haverhill/West Suffolk: there is limited local SEND provision, with many young people placed outside their home district.

6.5. The above highlights that there are a number of gaps in the provision of SEND services. This proposal helps fill these gaps which are as follows:

- Lack of post-16 and transitional SEND provision in Braintree and the wider Essex/Suffolk border.
- Over-reliance on out of district placements, increasing costs and travel times.
- Insufficient facilities that integrate education with independent living skills.

### **Community and Socio-Economic Benefits**

6.6. As highlighted previously, the proposals will have facilities that can be used by local residents outside the normal school opening hours. In turn, this will provide a number of community and socio-economic benefits as follows:

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- Meeting urgent educational need by providing up to 120 additional specialist places.
- Reducing travel and costs and supporting families locally, lowering reliance on distant placements.
- Providing community integration: shared use of hydro spa facilities and opportunities for interaction between pupils and local residents.
- Providing skills and independence by helping young adults prepare for employment, further education or independent living.
- Economic benefits: supporting local employment in education, care and facility management.

6.7. Further case study evidence of SEND provision in the local area can be found in Appendix A.



**Figure 4: CGI Image of Cabin Concept (Source: Agora Architects)**

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## 7. Pre-Application Engagement and Scheme Evolution

- 7.1. Pre-application advice was sought from Braintree District Council under reference 25/60186/PREAPP, in order to establish the acceptability of the principle of development and to identify any key constraints at an early stage. The Local Planning Authority confirmed that the principle of a Special Educational Needs and Disabilities (SEND) school is broadly supported, recognising the clear and pressing need for additional specialist educational provision within the District and wider area. The site was also considered to represent a generally suitable and sustainable location, providing a balance between accessibility to nearby settlements and a tranquil environment conducive to the needs of SEND students.
- 7.2. Notwithstanding this support in principle, the pre-application response identified a number of areas requiring further consideration. In particular, concerns were raised in respect of the impact of the proposals on designated heritage assets, including the Scheduled Monument and the Grade I listed Church of St Mary. The Council advised that, in its current form, the level of heritage harm would be significant and would require further justification in the overall planning balance. In addition, further information was requested in relation to the residential accommodation and the commercial elements of the hydrotherapy and wellbeing facility, in order to fully understand their role and necessity within the scheme.
- 7.3. The Applicant has carefully reviewed the pre-application feedback and has undertaken a series of targeted amendments to the scheme in order to address the concerns raised, with particular emphasis on reducing heritage impacts and improving the relationship between the proposed development and the historic environment. The revised scheme includes a reconfigured car park layout and access arrangement which removes the need for excavation within the Monument Protection Zone, thereby avoiding direct impacts on archaeologically sensitive areas. In addition, new hedgerow planting has been introduced to the northern boundary to provide effective screening of parked vehicles and to reinforce the rural character of the site. The hydrotherapy facility has also been redesigned to remove the requirement for piles or intrusive foundations within the pond bed, thereby reducing both physical and visual impacts on the historic landscape.
- 7.4. These amendments represent a clear and proportionate response to the issues identified through the pre-application process and demonstrate a commitment to delivering a scheme that is both policy compliant and sensitive to its context. The evolution of the proposals has resulted in a more carefully considered layout, reduced intervention within sensitive areas, and an enhanced landscape framework that better integrates the development into its surroundings.

### *Heritage Considerations*

- 7.5. The site is of considerable historic significance, containing a Scheduled Monument comprising a moated site and mill complex of pre-Conquest origin, as well as being located within the setting of the Grade I listed Church of St Mary. These assets form a strongly interrelated group, representing the remains of a historic manorial landscape of national importance. The significance of the Scheduled Monument lies not only in its visible earthworks, but also in its buried archaeological remains, which have the potential to provide important evidence of medieval settlement and land use. The relationship between the monument and the church contributes substantially to their collective significance and legibility within the landscape.

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7.6. Consultation has been undertaken with relevant heritage consultees, including Historic England. At the time of submission, Historic England has not provided a formal response; however, informal feedback has been received which has informed the evolution of the scheme. This feedback acknowledges that the removal of elements which interrupt the spatial relationship between the moat and the church represents a positive design principle and highlights the opportunity to enhance the significance and legibility of the site through the reduction of built form in sensitive areas.



**Figure 5: CGI Image of Hydro Building Concept (Source: Agora Architects)**

7.7. Historic England has also raised concerns regarding elements of the original proposals, particularly the use of piling and land raising within the Scheduled Monument, which, whilst potentially reducing the need for excavation, would nonetheless result in harm to both the physical fabric and the setting of the monument. It was noted that the threshold for obtaining Scheduled Monument Consent is high and that proposals introducing new structures or deposits within the monument are unlikely to be supported. Concerns were also expressed regarding the proximity of the proposed car parking and associated vehicle movements, which were considered to have the potential to adversely affect the setting of the monument.

7.8. Similarly, advice from the County Historic Buildings Consultant emphasised the national importance of the Scheduled Monument and its strong group value with St Mary's Church. It was noted that the introduction of additional built form within the immediate and wider setting of these assets has the potential to erode their significance, particularly where development encroaches upon key views or spatial relationships. The consultant also highlighted the importance of maintaining the open character of the land between the two scheduled areas, which currently allows an appreciation of their historic and functional relationship.

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7.9. In response to these concerns, the scheme has been revised to reduce its impact on the historic environment. Built form has been carefully repositioned to avoid the most sensitive areas, and construction approaches have been amended to minimise ground disturbance. The removal of intrusive elements and the enhancement of landscape features serve to reinforce the historic setting and improve the legibility of the heritage assets. These changes represent a meaningful reduction in harm and demonstrate a clear understanding of the site's significance and the requirements of national and local heritage policy.



**Figure 6: CGI Image of SEND School Main Building (Source: Agora Architects)**

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## 8. Other Considerations

### *Flood Risk and Drainage*

- 8.1. A Flood Risk Assessment has been prepared in support of the application (Ref: IE25/081/FRA, November 2025), which considers the potential risk of flooding to and from the site, as well as the implications of the proposed development. The assessment confirms that the site lies predominantly within Flood Zone 1, indicating a low probability of flooding, with limited areas of Flood Zones 2 and 3 located along the southern boundary associated with the existing pond and watercourse. Importantly, all proposed “more vulnerable” development has been directed to areas within Flood Zone 1, in accordance with the sequential approach set out in national policy.
- 8.2. The principal sources of flood risk identified are surface water (pluvial) flooding and, to a lesser extent, fluvial flooding associated with nearby watercourses. Surface water mapping indicates that there are areas of medium to high risk within the central and southern parts of the site; however, these are generally localised and associated with existing topographical features. Predicted flood depths are typically shallow, in the order of 0.2 to 0.3 metres, and are not considered to present a significant constraint to development.
- 8.3. The assessment concludes that the proposed development can be safely accommodated on the site, subject to the implementation of appropriate mitigation measures. These include the preparation of a surface water drainage strategy incorporating sustainable drainage systems, the development of a Flood Evacuation Plan, and further investigation of localised surface water ponding. The layout of the development has been designed to respond to identified risks, ensuring that vulnerable uses are located in areas of lowest risk and that flood risk is not increased elsewhere.
- 8.4. Overall, the findings of the Flood Risk Assessment demonstrate that the site is suitable for the proposed development in flood risk terms and that the requirements of the National Planning Policy Framework can be satisfied.

### *Landscape*

- 8.5. Existing mature trees and natural features will be retained where possible, with new planting introduced to reinforce biodiversity and create safe, tranquil outdoor learning spaces.
- 8.6. One of the many benefits of this site is the setting and the landscape forms part of this. The mature and extensive vegetation on all boundaries ensures that the site is well screened from the village and surrounding countryside.

### *Design*

- 8.7. The development will adopt inclusive design principles, ensuring accessibility for pupils with varied needs.
- 8.8. The school and accommodation will be low-impact, sympathetic in scale, and reflective of the rural character.

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- 8.9. The design has been guided by Agora Architects' commitment to contextual sensitivity, inclusivity, and sustainability. Each element of the proposal has been carefully developed to respond to the site's distinctive topography, landscape character, and rural setting, ensuring the architecture enhances its surroundings rather than competes with them.
- 8.10. The Special Educational Needs (SEN) School forms the heart of the scheme and is designed around principles of wellbeing, independence, and sensory engagement. Natural materials, generous glazing, and biophilic elements create calm, supportive spaces that foster connection with the environment. The hydrotherapy and wellbeing facilities extend this ethos, using natural ventilation, timber cladding, and soft landscaping to establish a tranquil, restorative setting.
- 8.11. The supported living cabins are conceived at a domestic scale to promote familiarity and independence for residents, combining accessibility with a homely character. Across all components, a unified architectural language ties together form, material, and function.
- 8.12. Sustainability underpins the entire proposal, with passive design measures complemented by active systems such as photovoltaic panels, rainwater harvesting, and ground-source heating. These interventions ensure a low-energy, environmentally responsible development that prioritises user wellbeing while contributing positively to the local landscape and community.

## Ecology

- 8.13. A Preliminary Ecological Appraisal (PEA) was undertaken by Arbtech Consulting Ltd in September 2025 for land at Sturmer Hall, Church Walk, Haverhill (CB9 7XD), to inform a planning application for the construction of 12–15 care bungalows and a new Special Educational Needs (SEN) school.
- 8.14. The assessment area comprises approximately 4.2 hectares and includes modified grassland, gravel storage areas, bramble scrub, and sealed surfaces. The habitats present are generally of *low ecological value* and are typical of previously developed land. No statutory or non-statutory designated sites occur within or adjacent to the development boundary.
- 8.15. No evidence of protected species such as bats, badgers, or dormice was found, and no significant invertebrate or reptile populations were recorded. Birds were observed nesting within bramble scrub and buildings, therefore any vegetation clearance should occur outside the nesting season (March–August inclusive). Suitable mitigation measures are recommended to safeguard any residual wildlife interest, including provision of bird boxes, bat boxes, and hedgehog houses as part of a wider Ecological Enhancement and Management Plan.
- 8.16. A Biodiversity Net Gain (BNG) assessment has been carried out to quantify habitat loss and identify on-site or off-site enhancement opportunities. Overall, the PEA concludes that the site presents no significant ecological constraints to the proposed development, subject to implementation of the recommended mitigation and habitat enhancement measure

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## 9. Conclusion

- 9.1. The proposal relates to an outline planning application with all matters reserved except for access and change of use application for a Special Educational Needs and Disabilities (SEND) school for up to 120 young adults at Sturmer Hall, Church Walk, Sturmer, Haverhill, CB9 7XD.
- 9.2. This proposal represents a sustainable, inclusive, and well-considered response to an urgent local and national need. It is fully aligned with the objectives of the NPPF and Braintree District Local Plan, delivering essential educational infrastructure while respecting heritage, landscape and ecology considerations as well as enhancing community wellbeing.
- 9.3. The development of a SEND school and transitional accommodation at Sturmer Hall will:
  - Address the critical shortage of SEND places.
  - Provide a nature-connected, nurturing environment for vulnerable young people.
  - Deliver community integration and long-term resilience.
- 9.4. The proposed scheme lies in flood zone 1, the lowest risk of flooding, is acceptable from a flood risk perspective and no exception or sequential tests are required.
- 9.5. To conclude, we would emphasise that there is a strong case in favour of this proposal. All planning applications should be considered on their own individual merits with the basic assessment process being whether the positives outweigh the negatives. As such, we highlight that the proposal takes account of all relevant Local Planning Authority and National Planning policies, and it constitutes sustainable development in economic, environmental and social terms. At present there is a clear government drive for the provision of SEND education facilities. We therefore consider the benefits of the proposal are not outweighed by any harm.
- 9.6. It is considered therefore, that the principle of the proposed development is in accordance with the NPPF and local planning policy and as such it should be approved.

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## Appendix A: Case Study Evidence of SEND Provision

### 1. Introduction

This appendix provides case study evidence to demonstrate the shortfall in SEND provision across Braintree District and the wider Essex/Suffolk border. It directly supports NPPF para 95 and Local Plan Policies LPP 52 and LPP 71.

### 2. Edith Borthwick School, Braintree

- All-through special school (ages 3–19).
- Rebuilt in 2015, still at capacity with waiting lists.
- Gap: No provision beyond 19.

### 3. Lexden Springs School, Colchester

- Relocated to a £14m facility in 2021, doubled capacity.
- Demand already exceeds supply.
- Gap: Oversubscription continues.

### 4. Southview School, Witham

- Specialist for physical and medical needs (ages 3–19).
- Gap: Narrow remit, no transition to adulthood support.

### 5. Suffolk / West Suffolk (Haverhill Area)

- Very limited SEND provision, especially post-16.
- Heavy reliance on out-of-county placements.

### 6. Cross-Regional Trends

- Capacity pressures across all schools.
- Lack of transitional pathways 16–25.
- Reliance on out-of-area placements.

### 7. Relevance to Sturmer Hall Proposal

- Provides 120 places and transitional accommodation.
- Reduces reliance on distant placements.
- Complements, not duplicates, existing provision.

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