

# Public Document Pack



	<b>DEVELOPMENT CONTROL COMMITTEE B</b>
<b>DATE:</b>	<b>WEDNESDAY, 5 FEBRUARY 2020 9.30 AM</b>
<b>VENUE:</b>	<b>KING EDMUND CHAMBER - ENDEAVOUR HOUSE, 8 RUSSELL ROAD, IPSWICH</b>

For consideration at the meeting on Wednesday, 5 FEBRUARY 2020, the following additional or updated papers that were unavailable when the Agenda was printed.

## TABLED PAPERS

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5	<b>SA/19/17 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 8 JANUARY 2020</b>	3 - 12
	To Follow	
b	<b>DC/19/03924 LAND TO THE WEST OF THE FORMER BACON FACTORY, ELMSWELL</b>	13 - 14
c	<b>DC/19/02312 LAND ON THE SOUTH SIDE OF FRAMLINGHAM ROAD, LAXFIELD, SUFFOLK</b>	15 - 22

For more information about this meeting, including access arrangements and facilities for people with disabilities, please contact the Committee Officer, Committee Services on: 01449 724930 or Email: [Committees@baberghmidsuffolk.gov.uk](mailto:Committees@baberghmidsuffolk.gov.uk)

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## NOVEMBER 2019

It was resolved that the Minutes of the Meeting held on 27 November 2019 were confirmed and signed as a true record.

### 89 TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME

None received.

### 90 SA/19/16 SCHEDULE OF PLANNING APPLICATIONS

In accordance with the Council's procedure for public speaking on planning applications a representation was made as detailed below:

Application Number	Representations From
DC/19/03659	Anthony Bryant (Brundish Parish Council) Amy Finn (Objector) Rupert Durrant (Applicant) Cllr Julie Flatman (Ward Member)
DC/19/02878	Jonathan Miller (Old Newton Parish Council) Michael Helliwell (Objector) Leslie Short (Agent) Cllr Rachel Eburne (Ward Member)
DC/19/03924	Peter Dow (Elmswell Parish Council) Geoff Armstrong (Agent) Cllr Sarah Mansel (Ward Member) Cllr Helen Geake (Ward Member)

The Chair announced before the commencement of SA/19/16 that the applications would be taken in the following order:

1. DC/19/03659
2. DC/19/02878
3. DC/19/03924

### 91 DC/19/03659 NEWTONS FARM, STRADBROKE ROAD, BRUNDISH, WOODBRIDGE, SUFFOLK, IP13 8BG

#### 91.1 Item C

Application Proposal	DC/19/03659 Full Planning Application – Erection of 5 No dwellings (following demolition of agricultural buildings).
Site Location	<b>BRUNDISH</b> – Newtons Farm, Stradbroke Road, Brundish, Woodbridge, Suffolk, IP13 8BG

- 91.2 The Case Officer presented the application to the Committee outlining the proposal before Members, the layout of the site, and the officer recommendation of approval with conditions.
- 91.3 The Case Officer responded to Members' questions on issues including: that no response had been received from Planning Policy, and that it was deemed as feasible that the trees could be moved across the site but that a condition could be added to replant the trees if this failed.
- 91.4 The Area Planning Manager and Case Officer responded to Members' questions on issues including: the conversion of agricultural buildings under Class Q applications, and that a pond was proposed to be re-introduced on site.
- 91.5 Members considered the representation from Anthony Bryant of Brundish Parish Council who spoke against the application.
- 91.6 Members considered the representation from Amy Finn, who spoke as an objector.
- 91.7 Members considered the representation from Rupert Durrant, who spoke as the Applicant.
- 91.8 The Applicant responded to Members' questions on issues including: that a housing needs survey had not been conducted and what the positive impact of the development would be.
- 91.9 Members considered the representation from Councillor Julie Flatman who spoke as the Ward Member.
- 91.10 The Ward Member responded to Members' questions on issues including: that there were no bus services in the area.
- 91.11 Members debated the application on the issues including: the relevance of Class Q applications with regards to the site as this was not a Class Q application, the footprint of the building being significantly larger than the existing agricultural buildings, that the sites location was not sustainable, and that the proposed design was not in-keeping with the layout of the area which included the proposed height of the development.
- 91.12 The Area Planning Manager advised Members that the previous Class Q permission was a relevant material planning consideration and that it was within the Committee's prerogative to decide whether the enlargement of the footprint of developed land was acceptable.
- 91.13 Councillor John Matthissen proposed that the application be refused for the reason detailed below:

The application was refused for the following reason:-

The site benefits from a potential fallback position created by the previous (and now lapsed) Class Q barn conversion (Ref 3481/16) and full planning permission for the creation of one residential dwelling (Ref DC/18/02008) on site. However, it is considered that this application far exceeds both the scale of development and footprint of development established under this position. The increase in the number of dwellings and increase in the developed area of the site is such that it is not considered to be directly comparable and beyond the permitted allowance of Class Q that accepts the burden of development within strict criteria based on the principles of reuse of existing buildings and to restrict potential harm. Therefore, it is necessary to consider whether the development of the site would represent sustainable development without any potential fallback position or when this position is exceeded. When weighed against the three strands of the sustainability set out within the NPPF, while some positive benefits can be found when considering the social and economic impacts of development, the location of the site poorly connected to serviced (including education) and there are no nearby facilities to speak of such that there would be an overwhelming dependency on the use of private car travel by future residents of the site. It is further considered that the design of the proposed development would be out of keeping and out of character with the surrounding development and rural environment. Consequently, the scale of the environmental harm identified and scale of the development, when balanced against benefits of the site and any fallback position, would clearly and demonstrably outweigh the benefits of approving the application judged on its merits. The development is considered contrary to Local Plan 1998 policies H7 and GP1, Core Strategy policies CS1, CS2 and CS5 and NPPF.

91.14 Councillor Barry Humphreys MBE seconded the motion.

91.15 Members continued to debate the application on the issues including: Planning Appeal decisions that had taken place in the area, the visual impact of the proposed development, and the scale of the development.

91.16 By a unanimous vote

91.17 **RESOLVED**

**The application was refused for the following reason:-**

**The site benefits from a potential fallback position created by the previous (and now lapsed) Class Q barn conversion (Ref 3481/16) and full planning permission for the creation of one residential dwelling (Ref DC/18/02008) on site. However, it is considered that this application far exceeds both the scale of development and footprint of development established under this position. The increase in the number of dwellings and increase in the developed area of the site is such that it is not considered to be directly comparable and beyond**

the permitted allowance of Class Q that accepts the burden of development within strict criteria based on the principles of reuse of existing buildings and to restrict potential harm. Therefore, it is necessary to consider whether the development of the site would represent sustainable development without any potential fallback position or when this position is exceeded. When weighed against the three strands of the sustainability set out within the NPPF, while some positive benefits can be found when considering the social and economic impacts of development, the location of the site poorly connected to serviced (including education) and there are no nearby facilities to speak of such that there would be an overwhelming dependency on the use of private car travel by future residents of the site. It is further considered that the design of the proposed development would be out of keeping and out of character with the surrounding development and rural environment. Consequently, the scale of the environmental harm identified and scale of the development, when balanced against benefits of the site and any fallback position, would clearly and demonstrably outweigh the benefits of approving the application judged on its merits. The development is considered contrary to Local Plan 1998 policies H7 and GP1, Core Strategy policies CS1, CS2 and CS5 and NPPF.

**92 DC/19/02878 LAND OFF CHURCH ROAD, CHURCH ROAD, OLD NEWTON, IP14 4EF**

92.1 A short comfort break was taken between 10:36-10:45 after the completion of DC/19/03659 but before the commencement of DC/19/02878.

92.2 Item B

Application	DC/19/02878
Proposal	Outline Planning Application (some matters reserved – access and landscaping to be considered) – Erection of up to 64 dwellings (including up to 22 affordable dwellings).
Site Location	<b>OLD NEWTON</b> – Land Off Church Road, Church Road, Old Newton, IP14 4EF
Applicant	Mr North

92.3 The Case Officer presented the application to the Committee outlining the proposal before Members, the layout of the site, the previous approval on site, and the officer recommendation of approval with conditions.

92.4 The Area Planning Manager advised Members that the officer recommendation was updated to include the conditions as set out by the Environmental Management Officer as detailed in page 165 & 166 of the Agenda and that the Ecological measures be secured by condition.

- 92.5 The Case Officer responded to Members' questions on issues including: that the details of the dwellings locations would be available in a reserved matters application.
- 92.6 Members considered the representation from Jonathan Miller, of Old Newton Parish Council, who spoke against the application.
- 92.7 Members considered the representation from Michael Helliwell, who spoke as an objector.
- 92.8 The Objector responded to Members' questions on issues including: that the meadow associated with the application was not a Site of Special Scientific Interest (SSSI).
- 92.9 Members considered the representation from Leslie Short, who spoke as the Agent.
- 92.10 The Area Planning Manager clarified that the relevance of the Council's current policies had been tested at Appeals and were subsequently ruled as being out of date.
- 92.11 Members considered the representation from Councillor Rachel Eburne, who spoke as the Ward Member.
- 92.12 Members considered the written representation from Councillor Keith Welham, which was read out by the Chair.
- 92.13 Members debated the application on the issues including: the current Local Plan and settlement boundary, the Draft Joint Local Plan which included the proposed allocations and updated settlement boundary.
- 92.14 The Area Planning Manager advised Members that the Draft Joint Local Plan had negligible weight at its current stage, and that it and the previous local plan showed that the site was outside the settlement boundary.
- 92.15 Members continued to debate the application on the issues including: the Council's current and draft proposals for settlement boundary policies, the comments of the Parish Council, and the scale of the development.
- 92.16 In the absence of any further comments the Chair asked the committee to consider whether they would accept the resolution of a deferral to seek further Ecological comments due to the current holding objection.
- 92.17 The Area Planning Manager further advised that if Members were minded to defer then further information could be sought regarding the Deliverability of the site.
- 92.18 Councillor John Matthissen proposed that the application be deferred to seek further information on the Ecological mitigation measures and to confirm the deliverability of the site with the Applicant.



92.19 Members debated the merits of a deferment and whether the further information would significantly change Members view of the application to make a substantive resolution.

92.20 No seconder was found for the proposed deferral. The motion subsequently fell.

92.21 Councillor Harry Richardson proposed that the application be approved as detailed in the updated officer recommendation. Councillor Barry Humphreys MBE seconded the motion.

92.22 By 4 votes to 3

92.23 **RESOLVED**

**That Outline Planning Permission is Granted subject to conditions.**

**(1) Subject to the prior agreement of a Section 106 Planning Obligation on appropriate terms to the satisfaction of the Chief Planning Officer to secure:**

- **Affordable housing**
- **On site open space and includes management of the space to be agreed and requirement for public access at all times.**

**(2) That authority be delegated to the Chief Planning Officer to GRANT Planning permission subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:**

- **Standard time limit (3yrs for implementation of scheme/Outline/Reserved/Section73)**
- **RM to include layout, appearance etc. and detailed cross sections that show relationship of finished development with all adjoining sites + a minimum of 10% open space**
- **Approved Plans (Plans submitted that form this application)**
- **Phasing Condition (To allow phasing of the development and allows spreading of payments under CIL)**
- **External Materials to be submitted and chosen from traditional vernacular palette**
- **Swift boxes installation scheme to be agreed**
- **Hedgehog fencing scheme to be agreed**
- **SuDs conditions**
- **Market housing mix prior to or concurrent with reserved matters to be agreed**
- **Renewable Energy scheme to be agreed**
- **Rainwater harvesting to be agreed**
- **Construction Plan to be agreed.**
- **Level access to enable wheelchair access for all dwellings/buildings.**

**(3) And the following informative notes as summarised and those as may be deemed necessary:**

- Proactive working statement
- SCC Highways notes
- Support for sustainable development principles

(4) That in the event of the Planning obligations or requirements referred to in Resolution (1) above not being secured and/or not secured within 6 months that the Chief Planning Officer be authorised to refuse the application on appropriate ground

**Additional Conditions:**

- Ecological Coniditions as set out in the updated Consultee response

**93 DC/19/03924 LAND TO THE WEST OF THE FORMER BACON FACTORY, ELMSWELL**

93.1 Item A

Application	DC/19/03924
Proposal	Outline planning application (some matter reserved – access to be considered) for site redemption works (phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space, and associated landscaping (Phase 2).
Site Location	<b>ELMSWELL</b> – Land to the west of the Former Bacon Factory, Elmswell
Applicant	Harrow Estates PLC

93.2 The Case Officer presented the application to the Committee outlining the proposal before Members, the layout of the site, and the officer recommendation of approval.

93.3 The Case Officer and Area Planning Manager responded to Members' questions on issues including: the proposed access to the site, that there would be only one access, the advice that was given in the Suffolk Design Guide, the response from the Highways Authority, and the proposed vehicle routes that could be taken from the site to the A14.

94.4 Members considered the representation from Peter Dow of Elmswell Parish Council who spoke against the application.

94.5 Members considered the representation from Geoff Armstrong who spoke as the Agent.

94.6 The Case Officer responded to further questions from Members regarding the

capacity for healthcare and that this would be mitigated through the Community Infrastructure Levy (CIL).

94.7 Members considered the representation from Councillor Sarah Mansel who spoke as a Ward Member.

94.8 Members considered the representation from Councillor Helen Geake who spoke as a Ward Member.

94.9 The Ward Members responded to Members' questions on issues including: the expansion of schools in the area, and the current status of the Neighbourhood Plan.

94.10 Members debated the application on the issues including: the contents of the Suffolk Design guide , specifically regarding the access to the site and its suitability. Members continued to debate on issues including: the provision for education including the schooling provision, the proposed cycle benefits and the details of what these would be, and any risks of flooding downstream.

94.11 A short adjournment was taken between 12:55-13:01.

94.12 The Area Planning Manager addressed the Committee outlining concerns regarding the Highways comments and the proposed improvements and updated the officer recommendation as follows:

- That the application is deferred for the reason below:
- Officers Considered that given the questions raised on Highways matters during the presentation and debate that further consideration and detail was needed to provide Members with sufficient information to take a decision forward. Further details as to the highway considerations and improvements shall be compiled and the application would be returned to the MSDC Development Control B Committee.

94.13 Councillor Guthrie proposed that the application be deferred as detailed in the updated officer recommendation. Councillor John Matthissen seconded the motion.

94.14 By a unanimous vote

94.15 **RESOLVED**

**That the application was deferred for the reason below:**

- **Officers Considered that given the questions raised on Highways matters during the presentation and debate that further consideration and detail was needed to provide Members with sufficient information to take a decision forward. Further details as to the highway considerations and improvements shall be compiled and the application would be returned to the MSDC Development Control B Committee.**

**94 SITE INSPECTION**

94.1 None requested.

The business of the meeting was concluded at 1.03 pm.

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Chair

Your Ref:DC/19/03924  
Our Ref: SCC/CON/3473/19  
Date: 15 January 2020

**All planning enquiries should be sent to the Local Planning Authority.**

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

The Planning Department  
MidSuffolk District Council  
Planning Section  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

For the attention of: Daniel Cameron

Dear Daniel,

**TOWN AND COUNTRY PLANNING ACT 1990**

**CONSULTATION RETURN: DC/19/03924**

**PROPOSAL:** Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)

**LOCATION:** Land to the West of the former Bacon Factory West of Station Road Elmswell IP30 9ED

Following the deferral of the application at the Committee on 8th January, to assist the LPA to address concerns raised by the committee members, the County Council, as Highway Authority, make the following comments:

**Junction Capacity**

The Transport Assessment (TA) document supporting this application assessed the junctions within Elmswell and the only junction that was highlighted as a concern was School Road/ Church Road junction. By using the existing traffic flows, it determined that junction is functioning within capacity with the highest RFC being 0.54 (when RFC is 1.00, it is at capacity). By adding the traffic from the committed developments and the growth factor, this junction, the RFC increases to 1.00 in 2024; running at capacity. By adding this development's traffic, the RFC increases to 1.05; this equates to additional 6 cars queuing on School Road with an additional wait time of 86 seconds. Model predictions for queues and delays are unlikely to occur as in reality, drivers find an alternative route rather than queuing; travel down New Road to Cross Street junction and turn east or west, depending on their destination. Also, if work allows, people often travel out of the peak hours to avoid queues and delays.

**Level Crossing**

The TA recorded the queuing that the level crossing in the AM and PM peak periods. The level crossing operates 3 times per hour during the AM peak and 5 times per hour during the PM peak. The maximum time for the 'closure' was recorded as 4.19 minutes with maximum queue 22 vehicles in the AM peak and 6.04 minutes with maximum queue 17 vehicles in the PM peak. The queues clear after each closure; we consider this would be a safety concern if they did not clear. The calculated maximum number of vehicles from the development would be 3. However, It is considered that residents from the development would time their journeys to avoid these barrier operation times (as they are consistent every day).

### Cycle Link between Elmswell and Woolpit

Suffolk County Council and Sustrans are working together to deliver this cycle route between the villages. This will be included in the developing Local Transport Plan which has local support but the concept is still in draft.

### Public Transport Considerations

Travelling by train. from Elmswell, the journey time to Ipswich is 26 minutes and Cambridge is 58 minutes. The request for funding of £50,000 enable the local Community Transport provider to potentially recruit paid drivers which would then facilitate a regular scheduled trip from the new homes facilities in the village, Woolpit health centre and connections with the 384/385 routes between Bury and Stowmarket. It is considered Elmswell is a sustainable location and with the proposal to contribute to community transport, this will improve access for all users.

- From the above statement, we consider that the proposal for additional 65 dwellings would not create severe impact on the highway as
- 'appropriate opportunities to promote sustainable transport modes has been supported, safe and suitable access to the site can be achieved for all users' as outlined in paragraph 108 and
- development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe' as paragraph 109 of the NPPF.

Yours sincerely,

**Samantha Harvey**

**Senior Development Management Engineer**

Growth, Highways and Infrastructure

# Agenda Item 7c

The Rt Hon Robert Jenrick MP  
Secretary of State for Housing, Communities and Local Government  
House of Commons  
London  
SW1A 0AA

31/01/2020

By email and post

Dear Secretary of State

## **DC/19/02312 - outline planning application for 49 houses on south side of Framlingham Road**

I should like to request, on behalf of Laxfield Parish Council, that you exercise your powers as Secretary of State to call in the decision on the above planning application on the grounds that it:

- may conflict with national policies on important matters
- may have significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority

We make this request on the grounds that we believe:

- the Local Planning Authority (LPA) is not taking into account the overarching requirements of the UK Sustainable Development Strategy in determining whether the application represents sustainable development (for example, in disregarding the requirement that growth must be sustainable growth, not simply growth for its own sake)
- the LPA is disregarding the views and needs of the local community in being minded to grant permission for a development which will fundamentally alter the character and sense of place of the village, and damage the identity of the existing community and the place in which we live
- that it is disregarding the cumulative impact of development on a small rural village

This is nationally significant in that there is no evidence that LPAs are taking any strategic overview of the cumulative impact of development on a particular location. There is, however, clear evidence of the same pattern of disregarding the impact of development on the character and sense of place of vulnerable and often fragile rural communities in other locations across the UK.

I attach a copy of the Parish Council's objections to the proposal (as originally submitted for a development of 65 housing units, and as amended to the current application for 49 units) to help set this request in context.

Yours sincerely



Sue Innes  
Chair, Laxfield Parish Council

Dear Sirs,

## **Objection to DC/19/02312 - outline planning application for 65 houses on south side of Framlingham Road**

Laxfield Parish Council wishes to express its strong objection to the proposed development at Framlingham Road, Laxfield.

We believe that the development proposed is contrary to the policies set out within the Mid Suffolk Core Strategy Development Plan (adopted 2008) and in the emerging Joint Local Plan. The applicant makes reference to the provisions of paragraph 49 of the National Planning Policy Framework (NPPF), which provides that applications for housing should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. As Mid Suffolk District Council has published a Housing Land Supply Position Statement in March 2019 which concludes that the requirements of the NPPF are currently met, this argument has no validity.

Furthermore, this development cannot be considered to represent sustainable development. The Planning Statement sets out the degree to which it is considered to meet economic, social and environmental objectives, but these do not adequately consider the context of this development and reflect the reality of its location. To respond to these observations (*extracts from the Planning Statement in italics*):

*8.2.3 The construction phase will stimulate the local economy through the employment of construction workers/professionals and the sourcing of building materials.* The applicant has no control over the employment of those working on the development, nor on the sourcing of materials: the intention is that the site will be sold to a developer if planning permission is granted. There is no provision within the application to require sourcing of local materials nor local employment and this is therefore an entirely specious argument. *Secondly, future occupiers of the development will utilise local services and facilities, including those within Laxfield, supporting the local economy.* Most of the services and facilities within Laxfield are thriving without the additional pressure of a large development taking place at a single stroke; they would be much better able to cope with a number of smaller developments which would be more appropriate to the scale of the village. Some of the services in the surrounding area which would be essential for a development of this size are already at capacity or beyond: the doctors' surgeries in Fressingfield, Framlingham and Halesworth, for example.

*8.2.8 The development in this instance provides of up to 65 dwellings, including 35% affordable housing, and whilst the size and mix of the units is yet to be agreed, the proposal will provide a range of properties to cater for the needs of the community.* The indicative layout for the development suggests that a significant number of four- and five-bedroom houses is likely to be included in a full application, along with a few two-bedroom and just under 50% three-bedroom houses. This is not a range of housing that would meet local needs: Laxfield already has an over-supply of larger houses, and the predominant need is for truly low-cost – rather than 'affordable' – and self-build housing, along with sheltered housing and smaller units (as indicated in the research carried out for the emerging Neighbourhood Plan).

This research found that there was no appetite amongst the residents of the Parish for large-scale development outside the settlement boundary: 97% of residents favoured a number of small developments as being the best way to meet local housing needs. The primary needs identified are for sheltered accommodation; self-build housing; smaller (2-3 bedroom) housing units; and starter homes. Great concern was expressed about affordability and the fact that many local people cannot afford to enter the housing market.



Furthermore, there was almost no support from residents for development at a rate of more than 20 houses/year – almost all respondents strongly supported development of no more than 10 units/year over the Neighbourhood Plan period, ie to 2036.

Both the rate of development and the overall size of this proposal are entirely disproportionate to the immediate context: this development alone represents almost 15% of the current number of housing units in the Parish as a whole, and it is therefore completely out of keeping with the scale of the existing village and surroundings. The site was allocated in the 2017 Strategic Housing Land Availability Assessment for no more than 25 housing units on only part of the total site area, specifically in order to reduce the impact on the village of developing this site.

Although the Neighbourhood Plan is not yet ‘made’, the NPPF (in paragraph 29) specifically states that neighbourhood planning gives communities the power to develop a shared vision for their area, and (in paragraph 48) - allows for local authorities to give weight to emerging plans and we would therefore strongly urge Mid Suffolk District Council to take the findings of the Neighbourhood Plan research into account in reaching a decision regarding the appropriateness of the proposed development in this particular location. The NPPF states in paragraph 77 that planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. That the development proposed might be considered appropriate in some circumstances is not disputed: but we firmly believe that it is not appropriate for Laxfield; it is not responsive to the circumstances of the village or the Parish, and it does not reflect local needs.

**8.2.9 – 8.3.3 Provision of a School car park** These paragraphs refer to the proposed provision of 17 school car parking spaces, and 17 drop-off parking spaces within the development. Whilst it is acknowledged that the school and pre-school (which are co-located) would need additional accommodation provision to satisfy the need for places resulting from the proposed development, we understand that this school – in common with most others across Mid Suffolk – is currently at capacity but predicts a falling roll over the next few years. It is therefore arguable that the space released within the current school grounds for expansion would be sustainable in the medium to longer term. In addition, we firmly believe that the negative impacts of the proposed development would far outweigh the benefit offered by the parking and drop-off spaces indicated. In terms of safety, for example, the parking spaces are located across the road from the school and there is therefore an immediate hazard unless supervision is provided for pupils crossing the road (with substantially increased traffic levels from the new development). The Parish Council recognises the importance of supporting the school and pre-school, including the need for improved parking arrangements, but we believe that such arrangements could be made in better ways than as part of the proposed development.

**8.3.4 – 8.4** The bus services referred to in the Planning Statement are not adequate to be considered an effective alternative to car transport: the service which operates between Laxfield and Framlingham and then on to Ipswich, for example, operates once a day in each direction during the week. Train and bus services connecting from local provision to further afield are not sufficiently accessible to allow reliable travel to work or study opportunities. The argument that “*there are opportunities to access public transport*” therefore does not give an accurate picture of how realistic an option this really is. The development as proposed also clearly intends to be almost wholly reliant on transport by car, as the extent of provision of parking and garaging in the indicative layout clearly shows. The Planning Statement also makes no reference to options such as electric car charging or car sharing. Although there is reference to creating and extending the footpath network within the village, in reality this refer to creating a short length of footpath across land which is not in the applicant’s ownership, which therefore may not be a viable part of the development. There is

no potential to integrate this proposed development into the layout of the village: it is essentially separate because it sits outside the existing settlement boundary.

Environmental sustainability is not addressed in terms of design and layout of the proposed development (apart from the provision of an attenuation pond) with no reference to sustainable design and construction principles or techniques – or indeed anything other than public transport services. We would argue that any housing development cannot be considered environmentally sustainable unless sustainable design and construction is a fundamental requirement. The availability (or otherwise) of public transport is a very small component of environmentally sustainable housing.

Transport is, however, extremely important in terms of the proposed development for very different reasons. The single access to the site is located directly opposite the primary school on an already-busy C class road which is in very poor repair, with blind bends and narrow passing places. This road – and particularly the part adjacent to the proposed development site - is notorious locally for a number of accidents which have occurred at the blind bends just outside the existing settlement boundary. These were, thankfully, not serious enough to be reported to the police, but are still evidence that the road is unsuitable for the additional traffic which would be generated by the proposed development. In addition, the junctions at either end of Framlingham Road – with the High Street at the Laxfield end, and with the B1116 at the other – have no potential for alteration to cope with the additional traffic levels and we would therefore suggest that the applicant should (if the application is successful) be required to prove that the extra vehicle movements during and post-construction can be safely managed at these points.

The Transport Assessment provided as part of the documentation supporting this application states that the impact on local roads will be minimal. However, we believe that this assessment does not truly reflect the nature of the roads and the traffic in the specific context of Laxfield: the impact of the additional car movements might well be very small in the context of an urban environment, but in such a rural environment it would be extremely detrimental and represent a significant extra risk to both pedestrians and other road users.

In conclusion, we would add that the Parish Council is not opposed to new development in Laxfield in principle, and would actively support development which is appropriate to the expressed views and needs of local residents. We believe that there are other, far more appropriate options available: the Neighbourhood Plan group is actively developing proposals to support these views and needs (for example, through the establishment of a Community Housing Trust) at a rate and scale which is consistent with the rural nature of the Parish. We therefore firmly believe that Mid Suffolk District Council should refuse permission for the develop

Dear Sirs,

## **Objection to DC/19/02312 - outline planning application for 49 houses on south side of Framlingham Road**

Laxfield Parish Council notes that the proposal previously submitted has been amended to reduce the number of homes provided to 49 instead of 65. However, we believe that the fundamental principles of our previous objection still stand and we therefore wish to express our strong objection once again to the proposed development.

We believe the amended proposal is still entirely contrary to the policies set out within the Mid Suffolk Core Strategy Development Plan (adopted 2008) and in the emerging Joint Local Plan. To reiterate and emphasise some of the points made in our previous objection:

- The National Planning Policy Framework (NPPF) provides that applications for housing should be considered in the context of the presumption in favour of sustainable development. Laxfield has been identified in the emerging Local Plan as a hinterland settlement, which means that there are more sustainable locations for development within the District. The village is suffering from a reduction in the level of infrastructure and services it used to have: there is, for example, now no doctor's surgery and the regular bus service to Halesworth was terminated at the end of October.
- Laxfield has already delivered almost all of the housing contribution identified as appropriate in the emerging Local Plan, and over a very short timescale: 63 of the 65 housing units identified over the Plan period have already been granted planning permission (as shown in Appendix 1). The cumulative impact of this proposal in addition to the recent permissions for new development would be substantial and extremely damaging to the existing community, which is already suffering from the loss of services, and it would be a clear contravention of the presumption in favour of sustainable development to allow it to proceed.

***PLEASE NOTE: Since this letter was originally written, another planning application has been granted for a single housing unit. Appendix 1 has been updated to reflect this. Furthermore, an application for 11 housing units, as a second phase of an existing development, is currently awaiting a decision. We have every reason to believe that this application is very likely to be granted.***

- The scale of the proposed development is entirely disproportionate to a rural location: it still represents some 10% of Laxfield's existing housing stock even despite the reduction in numbers in the revised scheme. We believe that this development is more suited to an urban location where the comparative impact would be much smaller.
- The proposed site is at the edge of the village, leading into open countryside. Although the indicative design shown in the submission includes open space at the edge of the development, this cannot offset the visual impact of a large-scale development in such a rural location. The site is currently good agricultural land and is cultivated as such, and we see no need for its use to be changed for this particular purpose.
- The existing highways networks around the area are inadequate to cope with a development of this size: Framlingham Road itself is a minor road which is single-track in places and is in very poor repair. There is substantial local concern about the safety of locating the entrance to the site immediately opposite the school where there are already issues associated with

traffic at the beginning and end of the school day. This will only be exacerbated by the addition of a further 49 homes in such close proximity.

- The proposal includes an indicative masterplan for the site but the application is currently for access only with all other matters reserved. This means that the indicative scheme shown could very easily be changed in the future, and that it is not possible for the proposal to be assessed fully at this stage. We feel that this is not acceptable for a scheme which would have such a significant impact on the local environment if it were to be permitted. If the District Council were minded to consider the application further, we would request that a detailed planning submission be required so that all parties can assess the information appropriately.

We reiterate that we firmly believe that Mid Suffolk District Council should refuse permission for the development as proposed.

**APPENDIX 1 (updated): Planning permissions which contribute to Laxfield's assessed contribution of 65 homes over the period to 2036**

<b>Planning Permission Reference</b>	<b>Site Address</b>	<b>Date of approval</b>	<b>Net dwellings outstanding 2018</b>	<b>Net dwellings outstanding 2019</b>
M /3610/12/FUL	Co-operative Food Store, High Street	15/01/2013	1	
M /3844/12/FUL	Belle View, Cake Street	04/04/2013	1	
M /1683/13/FUL	The Old Boys School, Market Street	29/08/2013	1	
M /3064/13/FUL	2 Framlingham Road	03/12/2013	1	
M /2326/14/FUL	Brick barn at Corner Farm, Banyards Green	03/06/2015	1	
M /1683/15/FUL	Land rear of St. Helens, High Street	23/07/2015	1	
M /1073/16/FUL	Fishers Farm, Dennington Rd	11/05/2016	1	
M /3500/16/PRN	Corner Farm, Banyards Green	12/10/2016	2	
M /3642/16/OUT	Land on west side of Bickers Hill Road	11/04/2017	10	
DC/17/03501/FUL	The Villa High Street	12/09/2017	1	
DC/17/04032/FUL	Land to rear of Underlimes and St. Helens, High Street	06/10/2017	1	
DC/17/04774/PRN	Chestnut Tree Farm Framlingham Road	13/11/2017	1	
DC/17/04375/FUL	Land adjacent to Mill Road (south side of 13 Noyes Avenue)	23/11/2017	12	
DC/17/05227/FUL	Yew Tree Farm Station Road	13/03/2018	2	
DC/17/06313/FUL	Land to rear of Suffolk House, Underlimes and St. Helens, High Street	13/03/2018	1	
DC/17/05818/FUL	Land to rear of Suffolk House, High Street	22/03/2018	1	
DC/18/02051/FUL	Low Farm House Barn Mill Road Laxfield IP13 8HH	17/07/2018	0	1
DC/18/03616/FUL	Sandale Banyards Green Laxfield Woodbridge Suffolk IP13 8EU	29/10/2018	0	1
DC/18/04432/FUL	Land To Rear Of	28/11/2018	0	1

Planning Permission Reference	Site Address	Date of approval	Net dwellings outstanding 2018	Net dwellings outstanding 2019
	Underlimes And St Helens High Street, Laxfield IP13 8DU			
DC/19/00038/FUL	Land To The East Of Mill Road, Laxfield	13/02/2019	0	4
DC/19/01441	Land To The Rear Of Suffolk House, High Street, Laxfield, Suffolk,	21/05/2019	0	3
DC/19/01082	Land At Chestnut Tree Farm, Framlingham Road, Laxfield, Suffolk	16/05/2019	0	1
DC/19/01072	Barn At Little Meadows Farm Banyards Green Laxfield Woodbridge Suffolk IP13 8EU	25/04/2019	0	1
DC/19/00156	Land to the East of Mill Road, Laxfield, Suffolk	18/10/2019	0	13
DC/19/03856	Prior Approval for Change of Use of Agricultural Building to Dwellinghouse, The Timbers, Banyards Green	15/11/2019	0	1
				<b>26</b>

**Total relevant permissions = 64**