

# Public Document Pack



<b>COMMITTEE:</b>	<b>DEVELOPMENT CONTROL COMMITTEE B</b>
<b>DATE:</b>	<b>WEDNESDAY, 10 JULY 2019 9.30 AM</b>
<b>VENUE:</b>	<b>FRINK ROOM (ELISABETH) - ENDEAVOUR HOUSE, 8 RUSSELL ROAD, IPSWICH</b>

<b>Councillors</b>		
<u>Conservative and Independent Group</u> Peter Gould Kathie Guthrie (Chair) Barry Humphreys (Vice-Chair) Harry Richardson	<u>Green Group</u> Terence Carter John Matthissen Rowland Warboys	<u>Liberal Democrat Group</u> Mike Norris

This meeting will be broadcast live to Youtube and will be capable of repeated viewing. The entirety of the meeting will be filmed except for confidential or exempt items. If you attend the meeting in person and make a representation you will be deemed to have consented to being filmed and that the images and sound recordings could be used for webcasting/ training purposes.

The Council, members of the public and the press may record/film/photograph or broadcast this meeting when the public and the press are not lawfully excluded.

## **AGENDA**

### **PART 1**

#### **MATTERS TO BE CONSIDERED WITH THE PRESS AND PUBLIC PRESENT**

Page(s)

- 1 **APOLOGIES FOR ABSENCE/SUBSTITUTIONS**
- 2 **TO RECEIVE ANY DECLARATIONS OF PECUNIARY OR NON-PECUNIARY INTEREST BY MEMBERS**
- 3 **DECLARATIONS OF LOBBYING**
- 4 **DECLARATIONS OF PERSONAL SITE VISITS**
- 5 **SA/18/3 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 12 JUNE 2019** 1 - 12
- 6 **TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

7	<b>SA/18/4 SCHEDULE OF PLANNING APPLICATIONS</b>	13 - 14
	<i>Note: The Chairman may change the listed order of items to accommodate visiting Ward Members and members of the public.</i>	
a	<b>DC/18/03114 LAND SOUTH WEST OF, MAIN ROAD, SOMERSHAM, SUFFOLK</b>	15 - 80
b	<b>DC/18/05313 LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON</b>	81 - 182
c	<b>DC/19/01310 LAND ADJACENT TO THE PRINCIPAL'S HOUSE, STOKE ROAD, THORNDON, EYE, SUFFOLK, IP23 7JG</b>	183 - 234
d	<b>DC/17/02782 LAND OFF CHURCH ROAD, ACCESS VIA GARDEN OF "THE FIRS", THURSTON</b>	235 - 338
e	<b>DC/19/01604 LAND ADJACENT BT EXCHANGE, RISING SUN HILL, RATTLEDEN, SUFFOLK, IP30 0RL</b>	339 - 370

8 **SITE INSPECTION**

*Note: Should a site inspection be required for any of the applications this will be decided at the meeting.*

***Would Members please retain the relevant papers for use at that meeting.***

**Notes:**

1. The Council has adopted a Charter on Public Speaking at Planning Committee. A link to the Charter is provided below:

[Charter on Public Speaking at Planning Committee](#)

Those persons wishing to speak on a particular application should arrive in the Council Chamber early and make themselves known to the Officers. They will then be invited by the Chairman to speak when the relevant item is under consideration. This will be done in the following order:

- Parish Clerk or Parish Councillor representing the Council in which the application site is located
- Objectors
- Supporters
- The applicant or professional agent / representative

Public speakers in each capacity will normally be allowed 3 minutes to speak.

2. Ward Members attending meetings of Development Control Committees and Planning Referrals Committee may take the opportunity to exercise their speaking rights but are not entitled to vote on any matter which relates to his/her ward.

### **Date and Time of next meeting**

Please note that the next meeting is scheduled for Wednesday, 7 August 2019 at 9.30 am.

### **Webcasting/ Live Streaming**

The Webcast of the meeting will be available to view on the Councils Youtube page:  
[https://www.youtube.com/channel/UCSWf\\_0D13zmegAf5Qv\\_aZSg](https://www.youtube.com/channel/UCSWf_0D13zmegAf5Qv_aZSg)

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@babergmidsuffolk.gov.uk](mailto:Committees@babergmidsuffolk.gov.uk)

### **Introduction to Public Meetings**

Babergh/Mid Suffolk District Councils are committed to Open Government. The proceedings of this meeting are open to the public, apart from any confidential or exempt items which may have to be considered in the absence of the press and public.

### **Domestic Arrangements:**

- Toilets are situated opposite the meeting room.
- Cold water is also available outside opposite the room.
- Please switch off all mobile phones or turn them to silent.

### **Evacuating the building in an emergency: Information for Visitors:**

If you hear the alarm:

1. Leave the building immediately via a Fire Exit and make your way to the Assembly Point (Ipswich Town Football Ground).
2. Follow the signs directing you to the Fire Exits at each end of the floor.
3. Do not enter the Atrium (Ground Floor area and walkways). If you are in the Atrium at the time of the Alarm, follow the signs to the nearest Fire Exit.
4. Use the stairs, not the lifts.
5. Do not re-enter the building until told it is safe to do so.

## Mid Suffolk District Council

### Vision

**“We will work to ensure that the economy, environment and communities of Mid Suffolk continue to thrive and achieve their full potential.”**

### Strategic Priorities 2016 – 2020

#### 1. Economy and Environment

**Lead and shape the local economy by promoting and helping to deliver sustainable economic growth which is balanced with respect for wildlife, heritage and the natural and built environment**

#### 2. Housing

**Ensure that there are enough good quality, environmentally efficient and cost effective homes with the appropriate tenures and in the right locations**

#### 3. Strong and Healthy Communities

**Encourage and support individuals and communities to be self-sufficient, strong, healthy and safe**

### Strategic Outcomes

**Housing Delivery** – More of the right type of homes, of the right tenure in the right place

**Business growth and increased productivity** – Encourage development of employment sites and other business growth, of the right type, in the right place and encourage investment in infrastructure, skills and innovation in order to increase productivity

**Community capacity building and engagement** – All communities are thriving, growing, healthy, active and self-sufficient

**An enabled and efficient organisation** – The right people, doing the right things, in the right way, at the right time, for the right reasons

**Assets and investment** – Improved achievement of strategic priorities and greater income generation through use of new and existing assets ('Profit for Purpose')

# Suffolk Local Code of Conduct

## 1. Pecuniary Interests

Does the item of Council business relate to or affect any of your/your spouse /partner's pecuniary interests?

Yes

No

Declare you have a pecuniary interest

Leave the room. Do not participate or vote (unless you have a dispensation)

Breach = criminal offence

## 2. Non-Pecuniary Interests

Does the item of Council business relate to or affect any of your non-pecuniary interests?

Yes

No

No interests to declare

Declare you have a non-pecuniary interest

Participate fully and vote

Breach = non-compliance with Code

# Agenda Item 5

## MID SUFFOLK DISTRICT COUNCIL

Minutes of the meeting of the **DEVELOPMENT CONTROL COMMITTEE B** held in the King Edmund Chamber - Endeavour House, 8 Russell Road, Ipswich on Wednesday, 12 June 2019 - 09:30

### **PRESENT:**

Councillor: Kathie Guthrie (Chair)  
Barry Humphreys MBE (Vice-Chair)

Councillors: Peter Gould Sarah Mansel  
John Matthissen Richard Meyer  
Mike Norris Rowland Warboys

### **Ward Member(s):**

Councillors: David Burn

### **In attendance:**

Officers: Area Planning Manager (JPG)  
Planning Lawyer (IDP)  
Principal Planning Officer (BH/MR)  
Development Management Planning Officer (AS)  
Governance Officer (RC)

### **1 APOLOGIES FOR ABSENCE/SUBSTITUTIONS**

An apology of absence was received from Councillor Terence Carter.

Councillor Sarah Mansel substituted for Councillor Terence Carter.

### **2 TO RECEIVE ANY DECLARATIONS OF PECUNIARY OR NON-PECUNIARY INTEREST BY MEMBERS**

Councillor Barry Humphreys MBE declared a non-pecuniary interest in application DC/18/05397 as a Member of Stowmarket Town Council.

Councillor Richard Meyer declared a non-pecuniary interest in application DC/19/01356 as the Ward Member.

### **3 DECLARATIONS OF LOBBYING**

Councillors John Matthissen, Richard Meyer, Kathie Guthrie, Barry Humphreys MBE and Peter Gould declared that they had been lobbied on application DC/19/00061 by Councillor Jessica Fleming.

**4 DECLARATIONS OF PERSONAL SITE VISITS**

None declared.

**5 SA/19/1 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 24 APRIL 2019**

It was resolved that the Minutes of the meeting from 24 April 2019 were confirmed and signed as a true record.

**6 TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

None received.

**7 SITE INSPECTION**

7.1 The Case Officer presented application DC/18/03114 to Members outlining that the request for a site visit had been received from Councillor Killett before the end of her term of Office.

7.2 Councillor Guthrie proposed that Members undertake the site visit. Councillor Richard Meyer seconded the motion.

7.3 By a unanimous vote

**7.4 RESOLVED**

**That Members of the MSDC Development Control B Committee undertake a site visit of application DC/18/03114 on Wednesday 3 July 2019.**

**8 SA/19/2 SCHEDULE OF PLANNING APPLICATIONS**

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

**Schedule of Applications**

<b>Application Number</b>	<b>Representations From</b>
DC/19/01356	Cllr Richard Meyer (Ward Member)
DC/18/05397	None
DC/19/01248	Kate Beer (Objector) Jane Storey (Supporter) Ben Elvin (Agent) Cllr Sarah Mansel (Ward Member)



DC/19/00061	Roger Greenacre (Stuston Parish Council) Cllr David Burn (Ward Member)
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**9 DC/19/01356 LAND AT WARREN FARM, THE STREET, BADWELL ASH, SUFFOLK**

9.1 Item 1

Application Proposal	DC/19/01356 Outline Planning Application (all matters reserved)- Erection of up to 21 No dwellings including new access ( re-submission of withdrawn application DC/18/05331)
Site Location	<b>BADWELL ASH</b> – Land at Warren Farm, The Street, Badwell Ash, Suffolk
Applicant	Mrs Elaine Tague

9.2 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.

9.3 The Case Officer responded to Members’ questions on issues including: the response from the Planning Policy team, the access to the site, the landscaping on the site and the response from the Environmental Sustainability Officer.

9.4 Members considered the representation from the Ward Member, Councillor Richard Meyer.

9.5 The Ward Member responded to Members’ questions on issues including the number of available places at the local schools.

9.6 Members debated the application on the issues including: the affordable housing provision on the site, the response from the Parish Council, and the proposed Landscaping.

9.7 Councillor Barry Humphreys MBE proposed that the application be approved as detailed in the officer recommendation.

9.8 Councillor Peter Gould seconded the motion.

9.9 Members continued to debate the application on the issues including: the sustainability of the proposal, the landscaping and that the detail would be decided within a reserved matters application.

9.10 By 5 votes to 2

## 9.11 RESOLVED

That authority be delegated to Acting Chief Planning Officer to grant outline planning permission (full planning permission for the proposed access) for the proposed development

- (1) Subject to the prior agreement of a Section 106 Planning Obligation on appropriate terms to the satisfaction of the Acting Chief Planning Officer to secure:
- Affordable housing provision – 35% of the total number of dwellings that are constructed on the site

This shall include

- Properties shall be built to current Housing Standards Technical requirements March 2015 Level All ground floor 1 bed flats to be fitted with level access showers, not baths.
  - The council is granted 100% nomination rights to all the affordable units on initial lets and 75% on subsequent lets
  - All affordable units to be transferred freehold to one of the Councils preferred Registered providers.
  - Adequate parking provision is made for the affordable housing units including cycle storage for all units.
  - Commuted sum option available to be paid instead of on site provision should the LPA agree to such request.
- Contributions to school transportation from this site only to school as follows:  
Primary age pupils - £26 880  
Secondary age pupils - £14 400
  - A creation order to be made by Suffolk County Council to create a legal link between FP7 Badwell Ash and FP5 Langham - estimated cost £5,400.
  - A footbridge over the ditch to link FP7 Badwell Ash and FP5 Langham on the ground, thereby creating the entirely off road circular walking route for residents of the new development and existing local residents - estimated cost £1,600.

(2) That the Acting Chief Planning Officer be authorised to grant Planning Permission upon completion of the legal agreement subject to conditions as summarised below and those as may be deemed necessary by the Acting Chief Planning Officer :

- Standard time limit (3yrs for application for approval of reserved matters and commencement of development commenced not later than two years from final approval of reserved matters)
- Approved Plans (Plans submitted that form this application)
- Phasing Condition (To allow phasing of the development and allows

spreading of payments under CIL)

- Written Scheme of archaeological investigation
- No occupation of buildings until the site investigation and post investigation assessment completed
- Agreement of a Construction Management Plan
- Proposed site access to have appropriate site splays with no obstruction above 0.6 m permitted in the splays
- Footway link to be provided to existing footway network prior to any dwelling being occupied
- Details of estate roads and footpaths to be approved
- No dwelling to be occupied until carriageways and footways serving that dwelling have been constructed
- Details of discharge of surface water on to highways to be approved
- Details of manoeuvring areas, parking (including electric charging points), secure cycle storage to be approved
- Details for storage and presentation of refuse/recycling bins to be approved
- Provision and approval of a Sustainability and Energy Strategy

(3) And the following informative notes as summarised and those as may be deemed necessary by the Acting Chief Planning Officer:

- Proactive working statement
- SCC Highways notes
- Support for sustainable development principles
- Unexpected ground conditions reported to the Local Planning Authority
- Responsibility for the safe development of the site rests with the developer
- Archaeological investigation in accordance with agreed brief
- Informatives recommended by Anglian Water

(4) That in the event of the Planning obligations referred to in Resolution (1) above not being secured that the Acting Chief Planning Officer be authorised to refuse the application on appropriate grounds.

(5) That in the event of the Planning obligations referred to in Resolution (1) above not being secured within 6 months that the Acting Chief Planning Officer be authorised to refuse the application on appropriate grounds.

**10 DC/18/05397 LAND TO THE WEST OF FARRIERS ROAD, EDGEComb PARK, STOWMARKET (IN THE PARISH OF COMBS) IP14 2FD**

10.1 Item 2

Application Proposal	DC/18/05397 Submission of details under Outline Planning Permission 1492/15: Appearance, Landscaping, Layout and Scale for Phase II for up to 110* dwellings to incorporate a sheltered housing scheme of up to 60 units and public open space areas. *NOTE – the applicant has applied for 90 units only, with a consequent reduction in the number
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Site Location	of sheltered housing units. <b>STOWMARKET-</b> Land West of Farriers Road, Edgecomb Park, Stowmarket (In the Parish of Combs) IP14 2FD
Applicant	Construct Reason Limited.

- 10.2 The Case Officer presented the application to the Committee Outlining the proposal before Members, the layout of the site, the associated decision on the first phase of the site, and the officer recommendation of approval with conditions.
- 10.3 The Area Planning Manager advised Members that the site before Members was an allocated site under the Stowmarket Area Action Plan and as such was not subject to the Community Infrastructure Levy (CIL) and that the application had been subject to a Section 106 Agreement for the Outline Application.
- 10.4 The Case Officer and Area Planning Manager responded to Members' questions on issues including: a landscaping requirement being conditioned and that there had been no response from the Environmental Sustainability Officer.
- 10.5 The Governance Officer read out a statement from the Ward Member Councillor Gerard Brewster.
- 10.6 Members debated the application on the issues including: the possibility of a bus gate, the mix of housing on the site, and the possibility of traffic.
- 10.7 The Area Planning Manager advised Members that after reviewing the outline permission, the consultee comments and the original consultee comments from the Highways Authority there had never been any request for a Bus Gate, and that it was not part of the application before Members.
- 10.8 Members continued to debate the application on the issues including: the connectivity of the proposal.
- 10.9 Councillor John Matthissen proposed that the application be deferred to look into the possibility of a Bus gate, to review the highways response, and to review the landscaping on the site.
- 10.10 Councillor Sarah Mansel seconded the motion.
- 10.11 By 3 votes to 5
- The Motion was lost.
- 10.12 Councillor Barry Humphreys MBE proposed that the application be approved as detailed in the officer recommendation with the additional condition as follows:
- Details of landscaping to boundary to be agreed.

Councillor Peter Gould seconded the motion.

10.13 By 5 votes to 3

10.14 **RESOLVED**

**(1) That the Corporate Manager- Planning for Growth be authorised to approve reserved matters of appearance, layout, scale and landscaping subject to conditions:**

- **Compliance with drawings**
- **Relocation of bin points**

**Additional Conditions:**

- **Details of landscaping to boundary to be agreed.**

**11 DC/19/01248 LAND TO THE EAST OF, SHARPES ROW, WOOLPIT, SUFFOLK**

11.1 A short comfort break was taken between 11:00-11:10 after the completion of application DC/18/05397 and before the commencement of DC/19/01248.

11.2 Item 3

Application Proposal	DC/19/01248 Outline Planning Application (Access to be considered) – Erection of 1no. dwelling and associated annexe and outbuildings (following demolition of existing building/ retention of workshop approved under 4996/16) utilising existing vehicular access.
Site Location	<b>WOOLPIT-</b> Land to the East of, Sharpes Row, Woolpit, Suffolk
Applicant	Mr and Mrs Beadman

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

11.4 The Case Officer responded to Members' questions on issues including: the location of the appeal site that was listed within the tabled papers.

11.5 Members considered the representation from Kate Beer who spoke as an objector.

11.6 Members considered the representation from Jane Storey, who spoke as a supporter. It was noted at the meeting that Jane Storey spoke as a member of the public and not in her capacity as a County Councillor.

11.7 The supporter responded to Members' questions on issues including: the access would also be used by agricultural vehicles.

11.8 Members considered the representation from Ben Elvin who spoke as the Agent on behalf of the Applicant.

11.9 The Agent responded to Members' questions on issues including: the ownership of the access lane, and the site was not used for commercial use.

11.10 Members considered the representation from the Ward Member, Councillor Sarah Mansel.

11.11 Members debated the application on the issues including: that the site was currently designated as previously used land, the state of the access lane, and the current permissions on the site.

11.12 Councillor Barry Humphreys MBE proposed that the application be approved as detailed in the officer recommendation with the additional condition that:

- Any outbuildings agreed in reserved matters shall be ancillary to the host dwelling and for domestic use only.

11.13 Councillor Mike Norris seconded the motion.

11.14 **RESOLVED**

**That the Acting Chief Planning Officer be authorised to Grant Planning Permission subject to conditions as summarised below and those as may be deemed necessary by the Acting Chief Planning Officer:**

- **Standard Time Limit – Reserved Matters**
- **Submission of Reserved Matters**
- **Approved Plans and Documents**
- **Landscaping and Aftercare**
- **Those required by the Local Highway Authority**
- **Annex Occupation Restriction**
- **No Commercial / Business Uses**
- **No more than 10 vehicles to be stored on site at any time**
- **Noise assessment and mitigation to be agreed prior to first use**
- **Hours of working during construction**
- **Restriction on burning / dust during construction**

**Additional Condition:**

- **Any outbuildings agreed in reserved matters shall be ancillary to the host dwelling and for domestic use only.**

**12 DC/19/00061 LAND AT SCOLE ROUNDABOUT, (JUNCTION BETWEEN A413 & A140)**

12.1 Item 4

Application	DC/19/00061
Proposal	Application for Advertisement Consent – Installation of a freestanding 12m totem sign.
Site Location	<b>STUSTON</b> – Land at Scole Roundabout, (Junction between A413 & A140)
Applicant	McDonald’s Restaurants Limited.

12.2 The Case Officer presented the application to the Committee outlining the proposal before Members, the layout of the site, the relevant history of the site, the tabled papers before Members, and the officer recommendation of approval with conditions.

12.3 The Case Officer responded to Members’ questions on issues including: the current height of the BP sign being 9 metres, that an identical sign to the one proposed had been approved on a previous application within close proximity to the proposal before Members.

12.4 Members considered the representation from Roger Greenacre of Stuston Parish Council who spoke against the application.

12.5 Members considered the representation from the Ward Member, Councillor David Burn.

12.6 The Ward Member responded to Members questions on issues including: the contents of the tabled papers.

12.7 Members debated the application on the issues including: that a fall-back position had been set by the approval on a previous application, that Members wanted to ensure that two of the signs were not erected.

12.8 A short break was taken between 12:25-12:30 for the Area Planning Manager and Case Officer to explore the option of whether a condition could be added so that two signs were not erected.

12.9 After the break the Area Planning Manager advised Members of the condition as follows if they were minded to approve the application:

- The hereby approved advert shall not be implemented if application DC/18/03527 is first implemented. Should application DC/18/03527 be implemented following the implementation of the advert hereby approved under this application then the approved advert under this consent shall be removed from site and site restored to its former condition within one month of implementation of DC/18/03527. Reason: In the interests of proper planning following the intentions of the application and to avoid cumulative harm to amenity.

12.10 Councillor Sarah Mansel proposed that the application be approved as detailed in the officer recommendation with the additional condition as advised by the Area Planning Manager.

12.11 Councillor John Matthissen seconded the proposal.

12.12 By a unanimous vote

12.13 **RESOLVED**

**That the Acting Chief Planning Officer – Planning for Growth be authorised to Grant Advertisement Consent subject to conditions as summarised below and those as may be deemed necessary by the Corporate Manager:**

- **Standard time limit**
- **Standard approved plans and documents condition**
- **Standard advertisement conditions (As required by Schedule 2 of the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended)):**
  - **No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.**
  - **No advertisement shall be sited or displayed so as to –**
    - (a) **endanger persons using any highway, railway, waterway, dock, harbour, or aerodrome(civil or military);**
    - (b) **obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; or**
    - (c) **hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.**
  - **Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.**
  - **Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.**
  - **Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.**

**Additional Condition:**

- **The hereby approved advert shall not be implemented if application DC/18/03527 is first implemented. Should application DC/18/03527 be implemented following the implementation of the advert hereby approved under this application then the approved advert under this consent shall be removed from site and site restored to its former condition within one month of implementation of DC/18/03527. Reason: In the interests of proper planning following the intentions of the**



**application and to avoid cumulative harm to amenity.**

The business of the meeting was concluded at 12.33 pm.

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Chair

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# Agenda Item 7

## MID SUFFOLK DISTRICT COUNCIL

### DEVELOPMENT CONTROL COMMITTEE B

10<sup>th</sup> July 2019

#### INDEX TO SCHEDULED ITEMS

<u>ITEM</u>	<u>REF. NO</u>	<u>SITE LOCATION</u>	<u>MEMBER/WARD</u>	<u>PRESENTING OFFICER</u>	<u>PAGE NO</u>
7A	DC/18/03114	Land South West of, Main Road, Somersham, Suffolk	Cllr John Field / Blakenham	Jack Wilkinson	15-80
7B	DC/18/05313	Land on the South Side of Bildeston Road, Offton	Cllr Daniel Pratt/ Battisford and Ringshall	Mark Russell	81-182
7C	DC/19/01310	Land Adjacent to the Principal's House, Stoke Road, Thorndon, Eye, Suffolk, IP23 7JG	Cllr Andrew Stringer/ Mendlesham	Gemma Walker	183-234
7D	DC/17/02782	Land Off Church Road, Access Via Garden of "The Firs", Thurston	Cllr Wendy Turner & Cllr Harry Richardson / Thurston	Mark Russell	235-338
7E	DC/19/01604	Land Adjacent BT Exchange, Rising Sun Hill, Rattlesden, Suffolk, IP30	Cllr Penny Otton/ Rattlesden Ward	Jamie Edwards	339-370

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# Agenda Item 7a

## Committee Report

**Item 7A**

**Reference:** DC/18/03114

**Case Officer:** Gemma Walker

**Ward:** Blakenham

**Ward Members:** Cllr John Field

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## RECOMMENDATION – APPROVE PLANNING PERMISSION

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### Description of Development

Planning Application - Residential development of 42 dwellings, together with associated public open space, access roads, garaging and car parking.

### Location

**Address:** Land South West Of, Main Road, Somersham, Suffolk

**Parish:** Barking and Somersham

**Site Area:** 1.87ha

**Conservation Area:** Not in Conservation Area

**Listed Building:** Not listed

**Received:** 09/07/2018

**Expiry Date:** 20/07/2019

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**Application Type:** Full Plans Planning Permission

**Development Type:** Small Scale Major Dwellings

**Environmental Impact Assessment:** N/A

**Applicant:** Hopkins and Moore (Developments) Limited

**Agent:** N/A

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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The application is referred to committee for the following reason:

- The application is a Major Application, requiring determination by Planning Committee as the amount of houses proposed exceeds 15 in total.

### Details of Previous Committee / Resolutions and Member Site Visit

Member Site Visit - 3<sup>rd</sup> July 2019

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## **PART TWO – APPLICATION BACKGROUND**

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## **Summary of Policies**

FC01 - Presumption In Favour of Sustainable Development  
FC01\_1 - Mid Suffolk Approach to Delivering Sustainable Development  
FC02 - Provision and Distribution of Housing  
CS01 - Settlement Hierarchy  
CS02 - Development in the Countryside & Countryside Villages  
CS03 - Reduce Contributions to Climate Change  
CS04 - Adapting to Climate Change  
CS05 - Mid Suffolk's Environment  
CS06 - Services and Infrastructure  
GP01 - Design and layout of development  
HB14 - Ensuring archaeological remains are not destroyed  
H07 - Restricting housing development unrelated to needs of countryside  
H13 - Design and layout of housing development  
H14 - A range of house types to meet different accommodation needs  
H15 - Development to reflect local characteristics  
H16 - Protecting existing residential amenity  
H17 - Keeping residential development away from pollution  
T09 - Parking Standards  
T10 - Highway Considerations in Development  
RT04 - Amenity open space and play areas within residential development  
CL08 - Protecting wildlife habitats  
National Planning Policy Framework (NPPF)

## **Supplementary Planning Documents**

Suffolk Adopted Parking Standards (2015)  
Suffolk Design Guide (2000)

## **Pre-Application Advice**

Pre-application discussions were held between the Applicant and Council Officers under reference DC/17/05640. Comments expressed were largely positive, taking into account the planning policy position at the time.

## **Consultations and Representations**

During the course of the application consultation and representations from third parties have been received. These are summarised below.

### **A: Summary of Consultations**

#### **SCC Travel Planning**

No objection.

#### **Environmental Health - Air Quality**

No objection.

#### **Environmental Health - Land Contamination**

No objection.

#### **Public Rights of Way Officer**

No objection.

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**Local Lead Highways Authority (LLHA)**

No objection.

**Local Lead Archaeological Service**

No objection.

**SCC Strategic Development**

No objection.

**Place Services - Landscaping**

No objection.

**Waste Officer**

No objection.

**Anglian Water**

No objection.

**Arboricultural Officer**

No objection.

**Place Services - Ecology**

No objection.

**Local Lead Flood Authority (LLFA)**

No objection.

**SCC Fire and Rescue**

No objection.

**Public Realm**

No objection.

**Affordable Housing Officer**

No objection.

**BMSDC – Heritage Team**

Low level of less than substantial harm, following initial 'moderate' concerns. The proposal in its current form is considered to cause a low level of less than substantial harm to the significance of the nearby listed buildings, because it would diminish their setting. This harm should be weighed against public benefits as per para. 196 of the NPPF.

If you are minded to approve the application we would recommend the following condition. Notwithstanding the material details provided, manufacturer's details of all proposed facing and roofing materials should be submitted.

**Environmental Health - Sustainability**

Objection. The proposal is too vague in its commentary around the sustainability benefits provided in relation to new build.

## Somersham Parish Council

### Objection.

- Inadequate provision has been made for the dispersal of flood water on the site, where there is an existing problem regularly affecting Main Road.
  - There is inadequate provision for the disposal of foul water from the site
  - There are serious problems of access to and from the site and Main Road. Visibility of 90 metres in each direction from the entrance to the site has not been established.
  - Increased traffic in these circumstances causes unnecessary danger to drivers, pedestrians and cyclists
  - The close proximity of the site to Grade Two listed buildings - the Duke of Marlborough Public House and Kings Cottage, Lower Somersham Post Office, Street Farm – is incompatible with the setting and outlook of those properties and therefore directly conflicts with an essential element of the heritage listings.
  - The Parish Council is also reflecting the near-unanimous view of local residents, expressed at a special meeting in June and in frequent messages and conversations, that the above planning problems should lead directly to refusal of the application.
- 

### **B: Representations**

11 objections have been received, summarised as follows:

- Proposal raises concerns over road safety.
- The application and provided information are misleading and biased.
- Raised pedestrian risks in accessing village amenities through the absence of pathway and crossing, coupled with reduced visibility.
- No opportunity to construct footpath to reduce pedestrian risk.
- Inadequate provision of rural bus to serve the proposal.
- Proposal gives rise to an unsustainable increase in traffic.
- Existing road conditions are not suitable and will fall further into disrepair with increased traffic and industrial vehicles.
- Proposal cannot be served by the existing infrastructure.
- Proposed development is considered damaging to the countryside.
- Risk to cyclists using the roads.
- Proposal's modern mass housing will have a detrimental visual impact to the existing character and appearance of the area.
- Proposal will lead to the overdevelopment of the site.
- Light pollution from the proposed dwellings.
- Development of the land will exacerbate water drainage problems.
- Increased drainage problems pose damage to timber framed dwellings.
- Strain on local healthcare services.
- Proposal poses strains to local school.
- Vibration damage to dwellings caused by heavy traffic and land testing.
- Concerns regarding threat to wildlife.
- Inadequate sewerage system to serve proposal.
- The proposal is unnecessary given the proximity of other developments in neighbouring villages.
- Damage to heritage assets.
- The existing road is not wide enough for two-way traffic.
- Main road is unlit posing safety issues.



- Proposal does not comply with local and strategic policies.
  - Land in this proposal has previously been refused planning permission.
  - Noise pollution.
  - Inadequate parking per household within the proposal.
  - Danger of restricted emergency vehicle access.
  - Proposal puts village at risk of overdevelopment.
  - Road has a sharp bend, is extremely narrow and motorists have a short line of sight which increased traffic will exacerbate.
  - Local facilities are inadequate to serve the proposal.
  - No safe footpath to serve an increase in students to the school.
  - Increase in school traffic at peak time due to a lack of footpath and safe school walking route.
  - Light pollution will disrupt wildlife.
  - Proposed urbanisation poses threat to endangered species.
  - Flats included in the proposal are unsuitable for the village.
  - Increased air pollution from an increase in traffic.
  - The proposed dwellings are cramped and do not complement the countryside surroundings.
  - Properties will be overlooked.
  - Proposal poses privacy issues.
- 1 no. petition was also received comprising of 164 signatures, which has been validated and recorded by the Corporate Manager for Democratic Services. Officers note the nature and extent of the document lodged.

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## **PART THREE – ASSESSMENT OF APPLICATION**

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From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.

### **1. The Site and Surroundings**

- 1.1 The application concerns an area of land extending to 1.87ha on the western edge of the village of Somersham. Somersham is defined as a 'Primary Village' in the Mid Suffolk Core Strategy 2008. The site has a frontage to Main Road (a classified 'C' road).
- 1.2 The site is described as being in agricultural use (equine grazing paddocks) accessed via a shared vehicular and pedestrian entrance from a point slightly north-western of the Main Road frontage, with a shingled track running south-west into the site, before turning 90 degrees to turn north-westwards, leading to an existing storage barn and two smaller stable buildings sited adjacent to the north-western boundary. A similar sized small stable building lies broadly opposite to these, adjacent to the south-eastern side boundary of the site.
- 1.3 The site is outside, but adjoining, the defined settlement boundary and outside the designated Conservation Area. Listed Buildings are within close proximity of the

subject site, namely the Grade II Listed Public House known as the Duke of Marlborough.

- 1.4 The site rises south-westwards away from the Main Road frontage and is currently enclosed by a combination of semi-mature deciduous trees and lengths of hedging along either side boundary, with more definitive hedging running to either side of the access to Main Road. The south-western rear boundary of the site is visually open, with only a 1.2m high timber post and rail fence delineating and separating the site from the arable field beyond.
- 1.5 The site is visually unconstrained.

## **2. The Proposal and Site History**

- 2.1 The application is for full plans planning permission for the erection of 42 No. dwellings, together with associated public open space, access roads, garaging and car parking.
- 2.2 The application is supported by a suite of plans. Key elements of the proposed layout are as follows:
  - Construction of a new vehicular and pedestrian access point into the site from Main Road to the north-east, in order to serve the development.
  - Formation of a new area of soft-landscaped public open space.
  - Mix of detached, semi-detached and block dwellings together with detached garaging.
  - Mix of 2, 1.5 and single storey dwellings.
  - Allocated parking and driveway areas, with private drive accesses.
  - Retention of majority of trees along the western, northern and southern boundaries of the site.
  - Significant area of public open space provided on the northern part of the site.
  - Affordable Housing provision of 15 dwellings (equivalent to 35%).

## **3. The Principle of Development**

- 3.1 The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites to provide for 5 years housing provision against identified requirements (Paragraph 73). For sites to be considered deliverable they have to be available, suitable, achievable and viable. The District is able to demonstrate a 5 year housing land supply. As such, the 'tilted balance' as set out under Paragraph 11(d) is not engaged.
- 3.2 Policy CS1 of the Core Strategy identifies a settlement hierarchy as to sequentially direct development, forming part of a strategy to provide for a sustainable level of growth. The Policy identifies categories of settlement within the district, with Towns representing the most preferable location for development, followed by the Key Service Centres, Primary then Secondary Villages.
- 3.3 The proposal site is located outside of a defined Settlement Boundary, in the countryside, and is therefore in conflict with Policy CS1 of the Core Strategy. The proposal represents housing development in the countryside, and in applying the principle of policy, the proposal is inconsistent with the aims and objectives of CS1.

- 3.4 However, LPA Officers acknowledge Planning Appeal decision APP/W3520/W/18/3194926 for Woolpit, which does reduce the weight of CS1 and other policies given the age of the Local Plan and conflicts with the NPPF. CS1 is therefore 'weighted' accordingly.
- 3.5 Further to the consideration of CS1, Policy CS2 states that in the countryside development will be restricted to defined categories in accordance with other plan policies which include (inter alia) rural exception housing. This housing may comprise; agricultural workers dwellings; possible conversion of rural buildings; replacement dwellings; affordable housing on exception sites; sites for Gypsies and Travellers and travelling showpeople; the extension of dwellings; and the reuse and adaption of buildings for appropriate purposes. The proposal does not constitute any of the category of housing types listed in Policy CS2. The site is not a rural exception site. There is no policy support for the proposal to be found at Policy CS2.
- 3.6 Saved Policy H7 of the Local Plan states that in the interests of protecting the existing character and appearance of the countryside, outside settlement boundaries there will be strict control over proposals for new housing. The provision of new housing will normally form part of existing settlements. The proposal is contrary to Policy H7.
- 3.7 Paragraph 79 of the NPPF seeks to avoid isolated dwellings in the countryside unless certain circumstances apply: a rural worker need; the optimal viable use of a heritage asset; involves re-use of redundant buildings; involves subdivision of an existing dwelling; or is a design of exceptional quality. The proposal does not meet any of these criteria. The proposal finds no support at Paragraph 79 of the NPPF.

#### **4. Sustainable Development**

- 4.1 Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and, as with the NPPF requirements, the Council will work proactively with developers to resolve issues that improve the economic, social, and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must be demonstrated against the principles of sustainable development. Furthermore, as set out above the proposal shall be considered with regards to sustainability and the requirements of Paragraph 8 of NPPF.

#### **5. Economic Dimension**

- 5.1 The provision of up to 42 no. dwellings will give rise to employment during the construction phase of the development. Furthermore, future occupiers of the development would be likely to use local services and facilities. The New Anglia 'Strategic Economic Plan' (April, 2014) acknowledges that house building is a powerful stimulus for growth and supports around 1.5 jobs directly and 2.4 additional jobs in the wider economy for every home built.
- 5.2 Furthermore, there will be a positive benefit through support of local amenities, facilities and services available in Somersham and surrounding villages from future owner / occupiers. Financially, the proposal would contribute to Council Tax, and also CIL although these are not material planning considerations but are included for completeness.

## **6. Social Dimension**

- 6.1 In respect to the provision of new housing, the development would provide a benefit in helping to meet housing need within the District through the delivery of additional dwellings, which would further be in an accessible location, making a contribution to securing a vibrant and sustainable community.
- 6.2 The proposal yields positive benefits through the potential for interaction by owner / occupiers within Somersham and surrounding villages. Positive contribution to the local community can in some instances generate stronger communities. The proposal provides a contribution to much needed housing, especially rural housing.

## **7. Environmental Dimension**

- 7.1 Paragraph 78 of the NPPF seeks to promote sustainable development in rural areas advising '*housing should be located where it will enhance or maintain the vitality of rural communities*', and recognises that where there are groups of smaller settlements, development in one area may support services in another.
- 7.2 The relationship to existing built development - Whilst the site is located outside of the defined Settlement Boundary, its relationship to the built up area is suitably related. The settlement pattern of Somersham is relatively mixed as it extends east and west from the historic core. The settlement pattern is relatively sporadic, with the application site located close to the centre. As such, and in consideration of the extent of the defined red line outline, the proposal is spatially acceptable.
- 7.3 The relationship to facilities and services, and their accessibility – Whilst Officers acknowledge the site is located in the countryside, the proposal lies adjacent the Somersham settlement boundary. Somersham is designated a Primary Village, served by a sufficient range of local services and facilities, all of which are within convenient walking distance of the subject site. These include; village hall, charity stall, playing fields, sports facility, 2 public houses, primary school, St Mary's Church, Baptist Church, car garage and community shop. A pedestrian footpath along the site frontage provides effective pedestrian access to the village's amenities. The proposed pedestrian footpath provision is an endorsed design response ensuring future on site occupant / owners can safely access the village. It is acknowledged that the footpath proposed along the site frontage heading south (out of the village) and north (into the village) do not connect to an existing footpath, however this is not fatal to the application. The site benefits from the provision of an existing footpath opposite, which leads both north and south, linking the site to the rest of the village at a pedestrian level. Public transport accessibility from the site is good with bus stops located at the nearby Duke of Marlborough (both directions) on Main Road. The accessible bus network (route 111) provides a viable option for residents to commute to other settlements for employment, education and healthcare etc. As such, there is opportunity for residents to choose more sustainable modes of transport than the private vehicle.
- 7.4 The Environmental Health – Sustainability Officer has objected to the scheme based upon the sustainability statement submitted. Officers consider the comments expressed, which relate to a largely 'vague' statement of insufficient depth. The consultee has stated that the statement does not provide adequate detail or information. Officers and members must therefore weigh up the comments made against the material planning policies contained within the Development Plan (if any) and NPPF.

7.5 In summary reference to Paragraph 8 of the NPPF, the scheme offers an effective use of land in the terms expressed, with good benefits materialising without undue harm to biodiversity, ecology or natural resources. In summary, the site is spatially acceptable, and is within reasonable access of facilities and services. On balance, the principle is acceptable.

## **8. Design and Layout**

8.1 Policy CS5 requires development to be of a high-quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district.

8.2 Policy H13 of the Local Plan requires new housing development to be expected to achieve a high standard of design and layout and be of a scale and density appropriate to the site and its surroundings, whilst Policy H15 of the Local Plan similarly requires new housing to be consistent with the pattern and form of development in the area and its setting.

8.3 Policy GP1 of the Local Plan states that proposals comprising poor design and layout will be refused, requiring proposals to meet a number of design criteria including maintenance or enhancement of the surroundings and use of compatible materials.

8.4 The purpose of the site layout plan is to illustrate the quantum of development, that being 42 no. dwellings, complete with parking provision, internal roadways, pedestrian footpaths and open space, can be accommodated at the site in an acceptable form.

8.5 Appropriate design is proposed for the new build units given the location within Somersham. The scheme adopts similar aesthetic details of existing residential dwellings within the close area, and therefore harmonises with the character and form established. Certainly, the existing domestic dwellings of two-storey form establish the principle of two-storey new build. It is also noted that the area is visually unconstrained, with varying design precedent offered. Such variance can in some instances attract a more expressive design, however, the scheme responds appropriately to the existing visual character. Officers acknowledge the heritage assets in close proximity (discussed later in the report under Section 16).

8.6 The scale and form mix provides a good standard of living accommodation for future owner / occupiers. The single storey, 1.5 and 2 storey form is acceptable, and integrates well with the existing contour of the land. The materials palette adopted is welcomed by Officers. The proposed blend of materials (secured through planning condition) ensure that the scheme would integrate with the surrounding area, through appropriate facing brick, render and weatherboard, and associated timber fenestration details all beneath slate and pantile roofs.

8.7 The proposal offers suitable design and an effective layout, offering an efficient and practical use of the land adjoining the Settlement Boundary. Officers consider the design to be sympathetic to the character of the surrounding area, without undue design or layout harm. Officers consider that there is a good degree of betterment for the area through the design and layout cues proposed, reflecting Policies CS5, H13, GP01 and the NPPF.

## **9. Site Access, Parking and Highway Safety Considerations**

- 9.1 Policy T9 and T10 requires development to be delivered with safe and sufficient highways access and function.
- 9.2 Paragraph 109 of the NPPF confirms that 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. This is interpreted as referring to matters of highway capacity and congestion, as opposed to matters of highway safety. The courts have held that the principle should not be interpreted to mean anything other than a severe impact on highway safety would be acceptable (*Mayowa-Emmanuel v Royal Borough of Greenwich [2015] EWHC 4076 (Admin)*).
- 9.3 On site parking is offered in accordance with the Suffolk Adopted Parking Standards SPD (2015), ensuring future residents are provided with on-site parking provision, thus avoiding parked vehicles on the public highway, and is spatially deliverable in conjunction with the number of residential units proposed. Furthermore, the LLHA have embraced the provision of off-site highways improvements, which will enhance function and efficiency for all future and existing occupants, secured through S106.
- 9.4 Officers acknowledge the 3<sup>rd</sup> party representations which object heavily to the scheme on traffic grounds, in particular the new access, and also pedestrian safety. Officers recognise these concerns, particularly at the Mill Lane / Street Farm junction as cited in the registered petition. Officers must consider the comments expressed by the LLHA also. The LLHA raise no objection to the proposed access arrangement nor the anticipated increase in traffic generated by the proposal on the local road network. The internal layout responds well in respect to parking spaces, turning areas, road and footway layout. Performance against the Suffolk Adopted Parking Standards (2015) shows that the parking needs for a 42 no. dwelling development can be delivered, including visitor parking. In addition to the *Mayowa-Emmanuel* case law, there is little before Officers to suggest a highways compliant development could not be achieved, underpinned by the LLHA comments.

## **10. Archaeology**

- 10.1 This site lies in an area of archaeological potential recorded on the County Historic Environment Record. Previous Geophysical Survey (Magnitude Surveys, 2018) was inconclusive therefore a trial trenched evaluation will be required to ground truth the geophysical survey results, especially given the size of the proposed development and the fact that this site and the surrounding area more generally, has not previously been subject to systematic archaeological investigation. The site's proximity to the river, its location on light soils, and the cropmark features (SSH 007) and multi-period finds scatters (SSH 015, SSH 016) which have been recorded in the vicinity mean there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.
- 10.2 In accordance with Paragraph 141 of the NPPF any permission granted should be the subject of a planning condition to record and advance understanding of the

significance of any heritage asset before it is damaged or destroyed. Standard pre and post investigative conditions are recommended.

## **11. Impact on Residential Amenity**

11.1 Policy H13 of the Local Plan seeks to ensure new housing development protects the amenity of neighbouring residents. Policy H16 of the Local Plan seeks to protect the existing amenity of residential areas.

11.2 Paragraph 127 of the NPPF sets out a number of core planning principles as to underpin decision-taking, including, seeking to secure a good standard of amenity for all existing and future occupants of land and buildings. The impact of the works is considered fully, and there is little before Officers to suggest the scheme would result in a materially intrusive development, which would hinder and oppress the domestic enjoyment and function of adjacent property, to an unacceptable level. Officers do not consider that the site is overdeveloped by virtue of the quantum of development shown on the proposed plans, demonstrating sufficient amenity space and parking provision.

11.3 The interface between the proposed dwellings is designed in a sufficiently sensitive manner ensuring that the internal amenity of the future occupants of the dwellings is achieved to a satisfactory level. The site layout demonstrates the site is readily capable of accommodating 42 no. dwellings in a manner that will not unduly compromise the residential amenity of future occupiers of the development or occupiers of neighbouring dwellings. More specifically, suitable distances between dwellings can be achieved to ensure no unacceptable loss of daylight, sunlight, or overlooking to the existing residents would ensue. It is noted that no objections have been received from residents in respect to potential loss of sunlight / daylight, visual bulk, overshadowing or loss of privacy.

11.4 Built form visible from a private vantage point does not necessarily result in adverse private residential amenity harm. There is little to suggest the development cannot accord with local policies H13 and H16.

## **12. Impact on the Character and Appearance of the Area**

12.1 In addition to Policies CS5, H13 and GP01, Paragraph 127 of the NPPF attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development.

12.2 Design should respond to the character of the area, offering uplift and betterment to the existing locality, which Officers encourage. In this respect, the inevitable urbanising effects of the scheme would result in built form visible from private and public vantage points, however this is not considered to be unacceptably harmful to the character and appearance of the unconstrained area. Officers note that objections raised do not relate to adverse character affects either. The scheme reflects the essence of Policy CS5, H13, GP01, and Paragraph 127 of the NPPF.

## **13. Landscape Impact and Trees**

13.1 Policy CS5 of the Core Strategy seeks to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the

landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encouraging development that is consistent with conserving its overall character.

- 13.2 The site is not in an area of special character designation such as an Area of Outstanding Natural Beauty or Special Landscape Area. Nor is the site adjoining, or in proximity to, any designated landscape areas of special significance. Whilst built form will naturally be visible, the depth of the valley reduces such landscape impact, but built form visible from a private and public vantage point is nonetheless considered.
- 13.3 The proposal adopts a proportionate setting through appropriately sized dwelling units, with adequate domestic garden spaces, and the sizable 0.25Ha of public open space area to the north. The density of the proposed development equates to 22.46dpHa (with public open space included). This is a policy compliant scheme, reflecting Paragraphs 57 – 58 of the PPG. The scheme does not therefore represent overdevelop through the eyes of policy.
- 13.4 The site is currently enclosed by a combination of semi-mature deciduous trees and lengths of hedging along either side boundary, with more definitive hedging running to either side of the access to the Main Road site frontage. The south-western rear boundary of the site is visually open, with only a 1.2m high timber post and rail fence delineating and separating the site from the arable field beyond. Built form will be visible from Main Road, along with views from the north and south, and from the densely agricultural west. Built form visible from a public vantage point does not necessarily result in adverse character harm. In this instance, the visual impact on the broader landscape will be limited. A comprehensive landscaping scheme ensures landscape character impacts are mitigated further. It is noted that none of the objections received to date have raised concern regarding landscape character effects. The proposal responds positively to Policy CS5.

#### **14. Ecology**

- 14.1 Policy CS5 of the Core Strategy requires development to protect, manage and enhance Mid Suffolk's biodiversity.
- 14.2 Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) requires all 'competent authorities' (public bodies) to 'have regard to the Habitats Directive in the exercise of its functions.' For a Local Planning Authority to comply with regulation 9(5) it must 'engage' with the provisions of the Habitats Directive.

#### **15. Flooding and Drainage**

- 15.1 The application is supported by a Drainage Strategy, and a suitably reflected site layout. The Planning Statement outlines that the development will be served by a Sustainable Urban Drainage System (SUDs) meaning the surface water run-off from the development will not be any greater than the current run-off rate. It is considered that the risk of flooding to the site has been adequately considered and therefore development of the site with the proposed mitigation measures does not pose an unacceptable flood risk to future occupants of the site or neighbouring occupants off



site. There is nothing before Officers to suggest a flood and water compliant development could not be delivered.

- 15.2 The drainage details have been reviewed by the LLFA who raise no objection to the proposal, subject to conditions.

## **16. Impact on Heritage Assets**

- 16.1 Policy HB1 of the Local Plan seeks to protect the character and appearance of buildings of architectural or historic interest, particularly protecting the settings of Listed Buildings.
- 16.2 Section 66 of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Listed Building or its setting.
- 16.3 In this case there are specific NPPF policies relating to designated heritage assets that should be considered.
- 16.4 Paragraph 185 of the NPPF identifies that the impact of a proposal on the significance of a heritage asset should be taken into account, in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 16.5 Paragraph 193 - 194 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 16.6 The NPPF defines the setting of a heritage asset as the surroundings in which it is experienced. The extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset; may affect the ability to appreciate that significance; or may be neutral.
- 16.7 The nearest designated heritage asset is located immediately north of the site, in the form of the Duke of Marlborough Public House. There is an acceptable level of separation distance between the built extent of the proposal, carrying a limited adverse contribution to the setting of this Grade II listed building. The layout of the site reflects this, through the location of the public open space to the north ensuring that the immediate setting of the heritage asset remains largely unaltered.
- 16.8 The Heritage Officer (HO) initially raised concern with the proposal, and the Application subsequently submitted amended plans. Comments are expressed verbatim:

*“The amended site plan shows that the layout of plots 40-42 has been amended to leave the former plot 42 undeveloped. The size of the dwelling on plot 1 has been reduced, although the height has not, and the design has been simplified. In all, this has reduced the level of less than substantial harm to the nearby listed buildings. In summary, some of the concerns raised by Heritage in our initial response have been addressed, including the amendment to plot 42, and a reduction in the scale of the building on plot 1. We would still consider that a certain amount of harm would be*

*caused to the character of the area which forms part of the wider setting of the listed buildings, by the addition of two-storey buildings to the front of the site and the use of gault brick in the material palette. Furthermore, the proposed red brick mixes all have a lot of variety in colouring (red, purple, grey and white). A brickwork mix that is more uniform in tones of red would be more reflective of the use of red brick on nearby historic properties, and would therefore likely be more appropriate. Submission of new proposed brick details could be dealt with through a condition.*

*The proposal in its current form is considered to still cause a low level of less than substantial harm to the significance of the nearby listed buildings, because it would diminish their setting. This harm should be weighed against public benefits as per para. 196 of the NPPF.*

*If you are minded to approve the application we would recommend the following condition. Notwithstanding the material details provided, manufacturer's details of all proposed facing and roofing materials should be submitted”.*

- 16.9 The proposal does not conflict with Policy HB1 or Paragraphs 185 and 193 - 194 of the NPPF to an unacceptable level warranting refusal. The overall public benefits (identified earlier in this report) of the scheme far outweigh the low level of less than substantial harm identified, for which Officers acknowledge and consider ‘on balance’ in full view of all material matters.

## **17. Public Open Space**

- 17.1 The scheme provides an area of public open space which is a welcome benefit for Somersham. The Public Realm Officer does not object to the proposal, stating that the management of the public open space should be secured through a management company / Parish. In addition, the Local Areas for Play (LAP) provision would not attract the need for play equipment. In any event, play equipment provision is not a fundamental aspect of the scheme

- 17.2 Based upon the current submission, a management plan for the public open space area (including any features) is required and it is most appropriate to secure this by way of planning obligation whereby the developer will establish a management company to manage the land or some other arrangement agreed with the Council. There is no proposal for the maintenance and management of the public open space area to be transferred to the Council.

## **18. Public Rights of Way**

- 18.1 The proposed development will have a direct impact on the local public rights of way (PROW) network. They are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism. The anticipated increased use of the PROW network as a result of the development will require the offsite improvement works by improving the surfacing on FP33 and FP35.

## **19. Affordable Housing**

- 19.1 Policy H4 of the Local Plan seeks an affordable housing provision of 35% of total units. The proposal provides 15 no. affordable homes, thus providing 35% affordable nature.

This is a welcome housing breakdown. The proposed plans label the open and affordable housing market mix as follows:

#### Open Market

- Type 660 - 2 Bed house (2 storey) x 3
- Type 790 - 3 Bed house (2 storey) x 2
- Type 800b - 2 Bed bungalow (1 storey) x 2
- Type 1013 - 3 Bed house (2 storey) x 2
- Type 1042 - 3 Bed house (2 storey) x 3
- Type 1050 - 3 Bed house (2 storey) x 1
- Type 1200sp - 3 Bed house (2 storey) x 1
- Type 1250b - 3 Bed bungalow (1 storey) x 1
- Type 1300 - 4 Bed house (2 storey) x 3
- Type 1355 - 4 Bed house (2 storey) x 2
- Type 1460 - 4 Bed house (2 storey) x 3
- Type 1639 - 4 Bed house (2 storey) x 1
- Type 2067 - 4 Bed house (2 storey) x 2
- Type 2223 - 4 Bed house (2 storey) x 1

TOTAL: 27 PLOTS

#### Affordable Rent & Shared Ownership

- 12 x Affordable Rent:
- 2 x 3 bedroom 5 person house @ 93sqm
- 5 x 2 bedroom 4 person house @ 79sqm
- 4 x 1 bedroom 2 person flat @ 50sqm
- 1 x 2 bedroom 4 person flat @ 70sqm
  
- 3 x Shared Ownership Tenure:
- 1 x 2 bedroom 4 person house @ 79sqm
- 2 x 3 bedroom 5 person house @ 93sqm  
(We cannot accept FOG/1.5 storey on site due to legal complications)

TOTAL: 15 PLOTS

19.2 Officers recommend the affordable housing contribution be secured through a Section 106 legal agreement, underpinned by the comments of the Strategic Housing Officer (SHO).

#### 19.3 Infrastructure

19.4 The proposed development has been assessed by Suffolk County Council's Development Contributions Manager. The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Provision of passenger transport
- Provision of library facilities
- Provision of additional pre-school places at existing establishments

- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

19.5 Officers note the pooled funds that the scheme would generate. The recommendation is made in full view of the comments expressed in relation to; education, pre-school provision, play space provision, transport issues, libraries, waste, supported housing, sustainable drainage systems, archaeology, fire service and superfast broadband.

19.6 Officers recognise the needs of the site and wider area, however, in the absence of a fully adopted infrastructure development plan the material weight applied to the identified infrastructure needs are limited.

#### 19.7 **Planning Obligations**

19.8 As noted above, the application would require the completion of a S106 agreement to secure the Affordable Housing, Public Open Space (Inclusive of Management Company), PROW improvement, and Public Transport improvements, summarised as follows:

- Affordable Housing at 35%
- Public Open Space inclusive of management company
- Public Rights of Way improvement works totalling £11,529.00.
- Public Transport improvements to install new bus stops on Main Road adjacent to and opposite the site completed under S278 or a contribution of £10,000.

19.9 Site specific mitigation will be covered by CIL comprising of contributions to education, pre-school provision, play space provision, transport issues, libraries, waste, supported housing, sustainable drainage systems, archaeology, fire service and superfast broadband.

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## **PART FOUR – CONCLUSION**

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### **20. Planning Balance and Conclusion**

20.1 The proposal Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, then that determination must be made in accordance with the plan unless material considerations indicate otherwise.

20.2 The NPPF dated 24<sup>th</sup> July 2018 contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.

20.3 In articulating the proposal amongst planning policy, the 'tests' of sustainability within the NPPF are principally engaged. Whilst the LPA is able to demonstrate that it has an adequate 5 year housing land supply, the Council still need to provide homes in

sustainable locations. Sequentially, the proposal hereby determined is considered through the eyes of Policy CS1 (applying appropriate weight), Paragraph 78 including the site's relationship to existing built development, and the relationship to facilities and services, and their accessibility, underpinned by the considerations of Paragraph 8.

20.4 The proposal is considered to form sustainable development within the criteria set out by the NPPF by reasons of the location of the site in relation to services generating a positive social, environmental and economic impact for Somersham and the wider area. The merits of the proposal outweigh the potential landscape, residential amenity, character, heritage and highways harm caused as a result of newly built dwellings outside of the settlement boundary. The proposal is considered to harmonise with local and national planning policies. The proposed development has been considered on the basis of its planning merits and the Officers recommendation is given accordingly, having had regard for all material planning considerations.

## **RECOMMENDATION**

**That authority be delegated to the Acting Chief Planning Officer to grant outline planning permission subject to a Section 106 Agreement for the following**

- Affordable Housing at 35%

Consisting of:-

- 12 x Affordable Rent:
  - 2 x 3 bedroom 5 person house @ 93sqm
  - 5 x 2 bedroom 4 person house @ 79sqm
  - 4 x 1 bedroom 2 person flat @ 50sqm
  - 1 x 2 bedroom 4 person flat @ 70sqm
- 3 x Shared Ownership Tenure:
  - 1 x 2 bedroom 4 person house @ 79sqm
  - 2 x 3 bedroom 5 person house @ 93sqm
- Public Open Space inclusive of management company
- Public Rights of Way surfacing improvement works to FP33 and FP35 totalling £11,529.00.
- Public Transport improvements to install new bus stops on Main Road adjacent to and opposite the site completed under S278 or a contribution of £10,000.

**And subject to the conditions as summarised below and those as may be deemed necessary by the Acting Chief Planning Officer:**

1. Time limit
2. Approved plans
3. Tree protection measures
4. Highways – visibility
5. Highways – details of estate roads and footpaths
6. Highways – binder course level
7. Highways – surface water discharge
8. Highways – loading / unloading
9. Highways – refuse / recycling
10. Highways – Deliveries Management Plan
11. Archaeology (Pre-Investigation)

12. Archaeology (Post-Investigation)
13. Ecology mitigation
14. Biodiversity enhancement
15. Landscaping scheme
16. Landscaping management plan
17. Surface water management / disposal strategy
18. SUDs details
19. Construction Surface Water Management Plan (CSWMP)
20. Materials
21. Fenestration
22. Levels (GFL and FFL)
23. Fire hydrant provision details

#### Notes

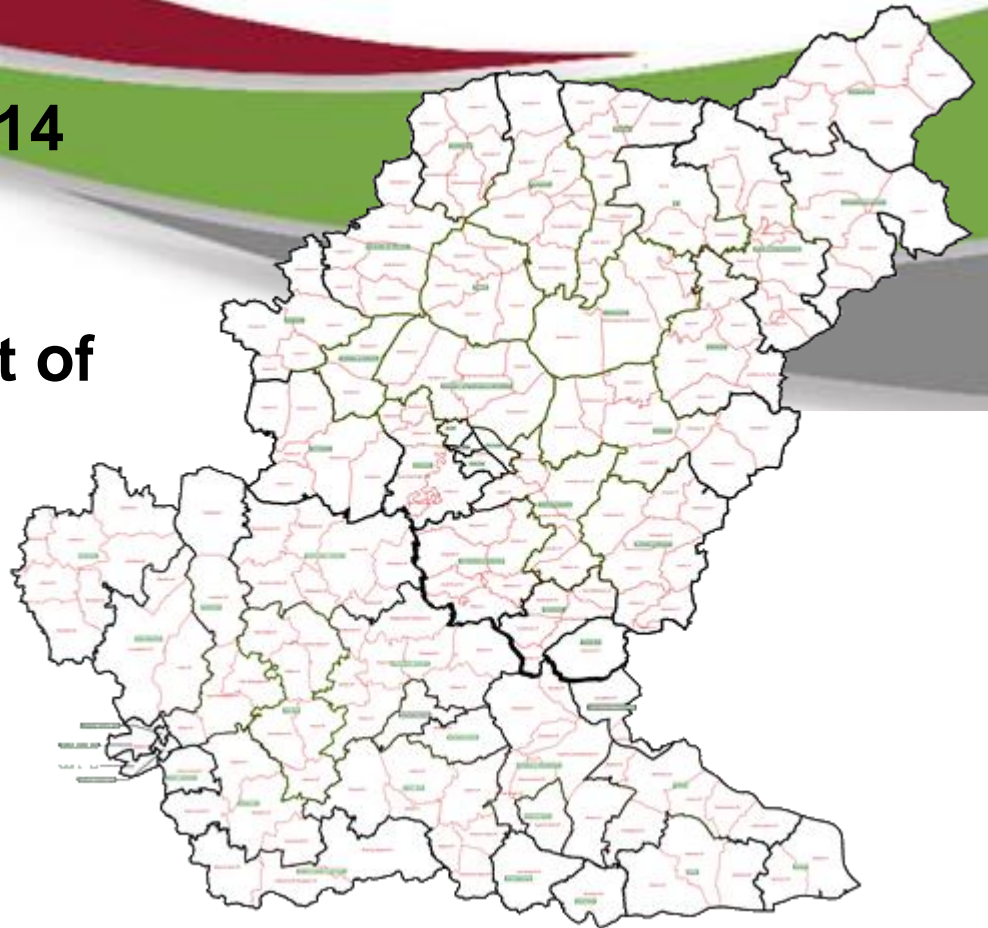
Section 38 of the Highways Act 1980

Section 278 of the Highways Act 1980

Scheme of archaeological investigation

**Application No: DC/18/03114**

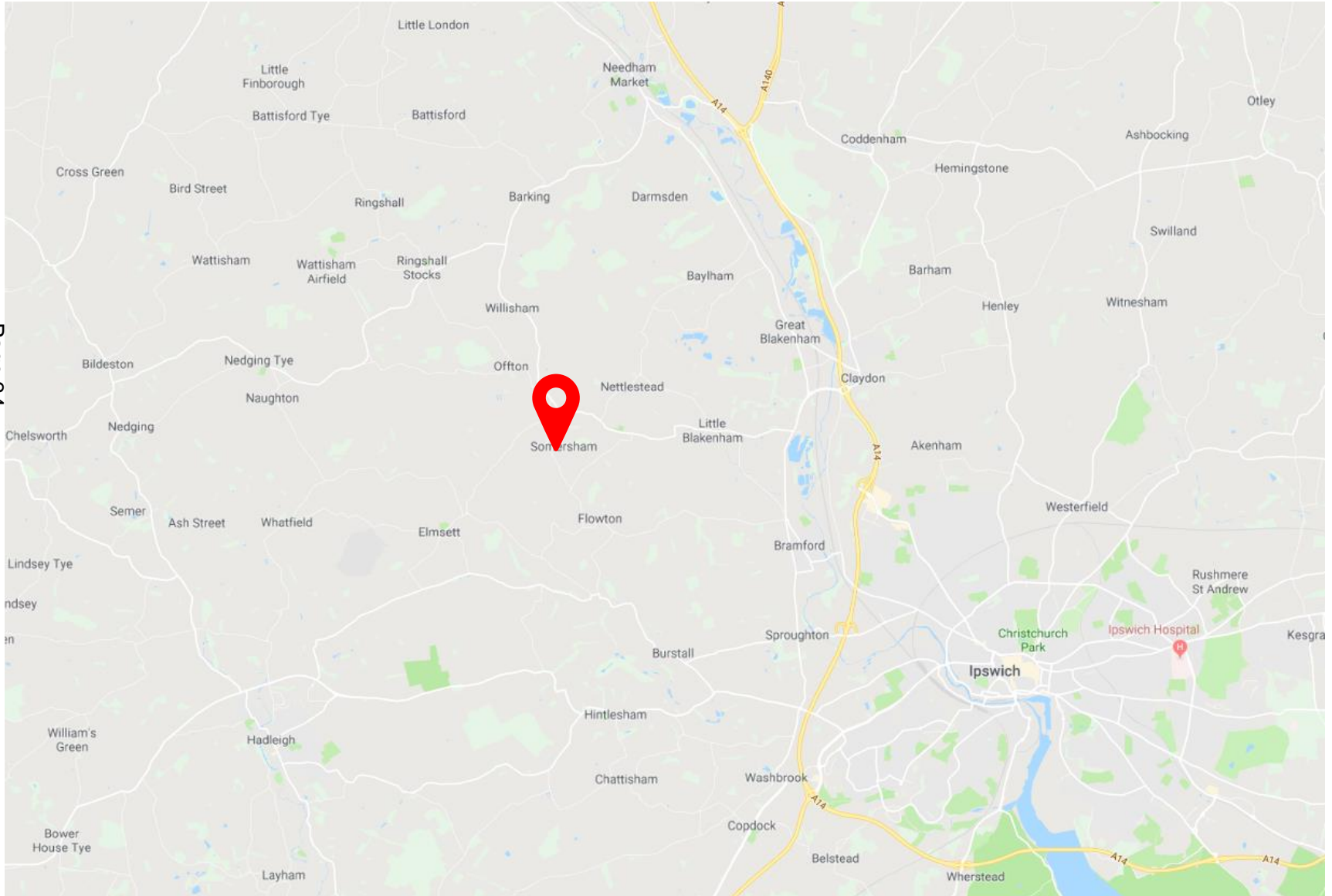
**Address: Land South West of  
Main Road, Somersham**



# Site Location

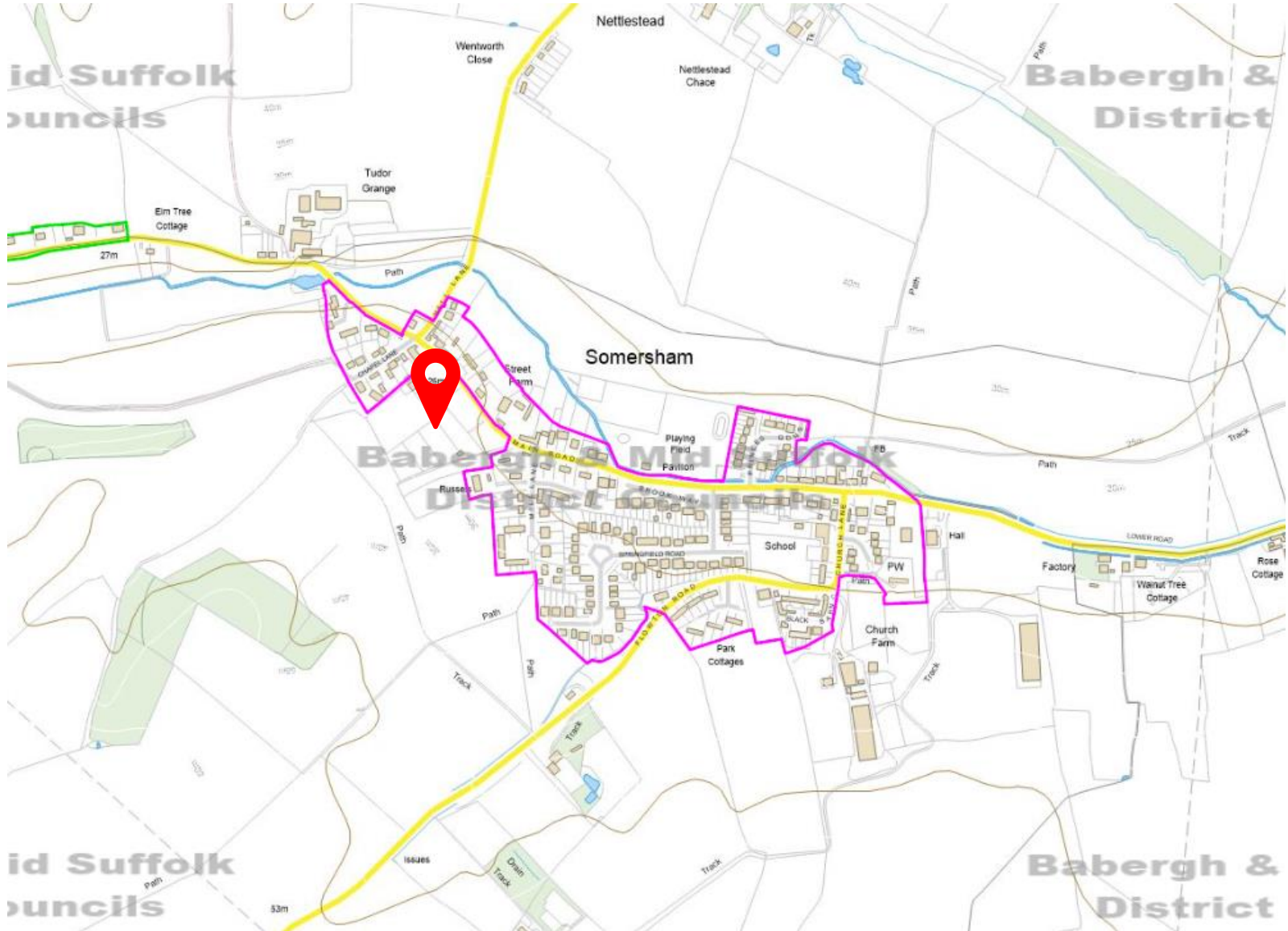
Slide 2

Page 34



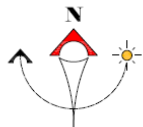


# Site Location

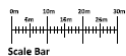




# Site Location Plan



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# Planning Layout



**NOTES:**

- Do not scale off this drawing
  - All information is to be checked on site and the Landscape Architect notified immediately of any discrepancies prior to the commencement of the works
  - This drawing is printed in colour. A monochrome copy should not be relied on.
  - This drawing is the property of SES Strategic Ltd. and must not be copied or reproduced without permission.
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**From:** Chris Ward

**Sent:** 28 August 2018 12:52

**To:** Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Re-consultation Request - DC/18/03114

Dear Gemma,

Thank you for notifying me about the re-consultation for the 42 dwelling residential development in Somersham. I can confirm that I have no further comment to make from my previous response on the 16<sup>th</sup> June 2018.

Kind regards

**Chris Ward**

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

**From:** Chris Ward

**Sent:** 16 July 2018 10:58

**To:** Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/18/03114 & DC/18/03115

Dear Gemma,

Thank you for consulting me about applications DC/18/03114 & DC/18/03115 at land to the south-west of Main Road in Somersham. I have no comment to make, as the existing sustainable transport infrastructure is limited for commuting purposes, in addition to the development being too small to justify a Travel Plan in accordance with national planning guidance.

Kind regards

**Chris Ward**

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>



**From:** Nathan Pittam  
**Sent:** 17 July 2018 09:35  
**To:** Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** DC/18/03114. Air Quality

Dear Gemma,

**EP Reference : 245688**  
**DC/18/03114. Air Quality**  
**Land South West Of, Main Road, Somersham, IPSWICH, Suffolk.**  
**Residential development of 42 dwellings, together with associated public open space, access roads, garaging and car parking.**

Many thanks for your request for comments in relation to the above application from the perspective of air quality. I can confirm that the likelihood of the proposed development significantly impacting on the existing good air quality in this location is sufficiently low for me to have no objections to the proposed development.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
Work: 07769 566988  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** Nathan Pittam  
**Sent:** 24 September 2018 14:12  
**To:** Gemma Walker <Gemma.Walker@babberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>  
**Subject:** DC/18/03114. Land Contamination: Re-consultation

Dear Gemma,

**EP Reference : 248435**  
**DC/18/03114. Land Contamination: Re-consultation**  
**Land South West Of, Main Road, Somersham, IPSWICH, Suffolk.**  
**Residential development of 42 dwellings, together with associated public open space, access roads, garaging and car parking**

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@babberghmidsuffolk.gov.uk](mailto:Nathan.pittam@babberghmidsuffolk.gov.uk)  
Work: 07769 566988 / 01449 724715  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** RM PROW Planning  
**Sent:** 19 July 2018 11:47  
**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** RE: MSDC Planning Consultation Request - DC/18/03114

**For The Attention of: Gemma Walker**

## **Public Rights of Way Response**

Thank you for your consultation concerning the above application.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Public Footpath 33 is recorded adjacent to the proposed development area.

Whilst we do not have **any objections** to this proposal, the following informative notes apply.

### **Informative Notes**

The granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

**To apply to carry out work on the Public Right of Way or seek a temporary closure**, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way/> or telephone 0345 606 6071.

**To apply for structures, such as gates, on a Public Rights of Way**, visit <http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.
2. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in

writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.

3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

4. If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.
5. The applicant must have private rights to take motorised vehicles over the Public Right of Way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a Public Right of Way other than a byway. We do not keep records of private rights and suggest a solicitor is contacted.
  - **Public footpath** – only to be used by people **on foot**, or using a mobility vehicle.
  - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
  - **Restricted byway** – has similar status to a bridleway, but can also be used by a 'non-motorised vehicle', for example a **horse and carriage**.
  - **Byway open to all traffic (BOAT)** – can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle. In some cases, there may be a Traffic Regulation Order prohibiting forms of use.
6. Public Rights of Way & Access is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage it is required to remedy.
7. There may be other public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

More information about Public Rights of Way can be found at [www.suffolkpublicrightsofway.org.uk](http://www.suffolkpublicrightsofway.org.uk)

**Jennifer Green**

**Rights of Way and Access**

Growth, Highways and Infrastructure, Suffolk County Council  
Suffolk Highways, Phoenix House, Goddard Road, Ipswich, IP1 5NP

Your Ref: DC/18/03114  
Our Ref: 570\CON\2901\18  
Date: 26<sup>th</sup> July 2018

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

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

The Planning Officer  
Mid Suffolk District Council  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**For the Attention of:** Gemma Walker

Dear Gemma

**TOWN AND COUNTRY PLANNING ACT 1990**  
**CONSULTATION RETURN DC/18/03114**

**PROPOSAL:** Planning Application - Residential development of 42 dwellings, together with associated public open space, access roads, garaging and car parking.

**LOCATION:** Land South West Of, Main Road, Somersham

**ROAD CLASS:**

Notice is hereby given that the County Council as Highway Authority make the following comments:

A Transport Statement is required with this application to consider the impacts of all the additional traffic generated by the development (and any committed developments in the area). As there is an increase in trips and traffic from this proposal, this could present a detrimental impact to the road network, so it is important that transport is assessed appropriately. Trip generation will need to be calculated and is generally reliant on an external database such as TRICS or similar approved. Please ensure 'village' trip rate is used in this location. The traffic surveys used within the assessment need to be no older than 6 months and committed developments are to be taken into consideration when calculating the traffic impact from this development. There has been an injury accident recorded in the immediate area so an accident analysis is required.

A plan of the access onto highway showing the visibility splays has not been provided. The required Visibility splay dimensions for a 30mph speed limit road is X=2.4m and Y=90m as stated in Design Manual for Roads and Bridges. If the site cannot achieve the required standards, a speed survey is acceptable evidence of actual speeds to enable a lower standard of visibility to be accepted.

The plans provided indicate a footway adjacent to the frontage of the site. Details of the proposals are required such as construction type, dimensions and levels. It is noted that there will be slopes behind the footway; cross sections and any retention details of the embankments are also required. Dimension of the junction, carriageway and footways are also required.

The external works layout indicates trees adjacent to the 'metalled' highway surfaces in front of Plots 4 to Plot 7. Section 141 Highways Act restricts planting of trees etc., in or near the carriageway and we do not support the planting of highway trees in the verge between a footway or cycleway and the edge of the carriageway. The current layout would not be suitable for adoption by Suffolk County Council as the Highway Authority. We prefer trees to be planted in non-highway locations such as 'open spaces'. We also would prefer the footway to be adjacent to the carriageway in this location and the verge removed.

At present, we would recommend a holding refusal on this application until the above points can be addressed, we look forward to receiving further information.

Yours sincerely,

**Sam Harvey**  
**Senior Development Management Engineer**  
Strategic Development

Resource Management  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX.

Enquiries to: Hannah Cutler  
Direct Line: 01284 741229  
Email: [Hannah.Cutler@suffolk.gov.uk](mailto:Hannah.Cutler@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018\_03114  
Date: 27/07/2018

For the Attention of Gemma Walker

Dear Mr Isbell

**Planning Application DC/18/03114/FUL – Land South West of Main Road, Somersham: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. Previous Geophysical Survey (Magnitude Surveys, 2018) was inconclusive therefore a trial trenched evaluation will be required to ground truth the geophysical survey results, especially given the size of the proposed development and the fact that this site and the surrounding area more generally, has not previously been subject to systematic archaeological investigation. The site's proximity to the river, its location on light soils, and the cropmark features (SSH 007) and multi-period finds scatters (SSH 015, SSH 016) which have been recorded in the vicinity mean there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to, and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).*

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. **In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made based on the results of the evaluation.**

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Dr Hannah Cutler

Archaeological Officer  
Conservation Team



Your ref: DC/18/03114/FUL  
Our ref: 00055732  
Date: 30 July 2018  
Enquiries to: Neil McManus  
Tel: 01473 264121  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Gemma Walker  
Mid Suffolk District Council,  
Endeavour House,  
8 Russell Road,  
Ipswich, Suffolk,  
IP1 2BX

Dear Gemma,

**Re: Residential development of 42 dwellings, together with associated public open space, access roads, garaging and car parking, Somersham, Land South West Of, Main Road IP8 4PB**

I refer to the above planning application in Mid Suffolk District. This letter provides an illustration of infrastructure requirements.

Proposed number of dwellings from development	1 Bedroom flats	2 Bedroom flats	2 Bedroom houses	3 Bedroom houses	4+ Bedroom houses	Total
	4	1	11	13	13	42
Approximate persons generated from proposal	5	1	25	30	30	91

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this application and this will need to be considered by the Council.

Paragraph 56 of the National Planning Policy Framework (NPPF) 2018 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District Councils have a shared approach to calculating infrastructure needs, in the adopted [Section 106 Developers Guide to Infrastructure Contributions in Suffolk](#).

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and Infrastructure.
- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

### **Community Infrastructure Levy**

Mid Suffolk District Council adopted a CIL Charging Schedule On 21st January 2016 and started charging CIL on planning permissions granted from 11th April 2016. Mid Suffolk are required by Regulation 123 to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Provision of passenger transport
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

As of 6th April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. The requirements being sought here would be requested through CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

### **Site specific mitigation will be covered by a planning obligation and/or planning conditions.**

The details of specific CIL contribution requirements related to the proposed scheme are set out below:

**1. Education.** Paragraph 94 of the NPPF states: 'It is important that a sufficient choice of school places is 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 schools through the preparation of plans and decisions on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

Furthermore, the NPPF at paragraph 104 states: 'Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to

minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;’

The local catchment schools are Somersham Primary School, Claydon High School and One. Based on existing forecasts SCC will have no surplus places available at any of the schools to accommodate the pupils arising from this scheme and SCC will require CIL contributions towards providing additional education facilities as defined in the table below:

School level	Minimum pupil yield:	Required:	Cost per place £ (2017/18):
Primary school age range, 5-11*:	10	10	12,181
High school age range, 11-16:	7	7	18,355
Sixth school age range, 16+:	2	2	19,907

Total education contributions:	<b>£290,109.00</b>
--------------------------------	--------------------

The scale of contributions is based on cost multipliers for the capital cost of providing a school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2017/18 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: ‘Promoting healthy and safe communities’. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision and all children in England receive 15 free hours free childcare. Through the Childcare Act 2016, from September 2017 families of 3 and 4 year olds may now be able to claim up to 30 hours a week of free childcare. This new challenge has increased the assumptions on the overall need for full-time equivalent (FTE) places.

This development is in the ward of Barking and Somersham where there is a predicted deficit of places. Therefore the 5 children arising from this development will require a contribution as set out in the table below:

	Minimum number of eligible children:	Required:	Cost per place £ (2017/18):
Pre-School age range, 2-4:	5	5	8,333

Required pre-school contributions:	<b>£41,665</b>
------------------------------------	----------------

- 3. Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A further key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.
- 4. Transport issues.** The NPPF at Section 9 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry of Transport Strategy, Strategic Development, SCC.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002). The guidance can be viewed at <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/2015-11-16-FINAL-2015-Updated-Suffolk-Guidance-for-Parking.pdf>

- 5. Libraries.** Refer to the NPPF Section 8: 'Promoting healthy and safe communities'. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space.

Using the established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent at the local catchment library and allows for improvements and enhancements to be made to library services and facilities, and outreach activity.

Libraries contribution:	<b>£8,190.00</b>
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- 6. Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality,

comprehensive and frequent household collection service.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

Waste Contribution:	<b>£2,142.00</b>
---------------------	------------------

- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Mid Suffolk housing team to identify local housing needs.

- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.'

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

- 9. Archaeology.** Please refer to the letter dated 27/07/2018 from Dr Hannah Cutler of the Suffolk Archaeological Service for further detail.

- 10. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

**11. Superfast broadband.** This should be considered as part of addressing the requirements of the NPPF Section 10 ‘Supporting high quality communications.’ SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion, it also impacts educational attainment and social wellbeing, as well as impacting property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

**12. Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

**13. Time Limits.** The above information is time-limited for 6 months only from the date of this letter.

The information above would form the basis of a future bid to the District Council for **CIL funds** if planning permission is granted and implemented.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,



Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Growth, Highways & Infrastructure Directorate – Strategic Development

cc Steve Merry, Transport Strategy, Strategic Development at Suffolk County Council  
Carol Barber, Schools Infrastructure team at Suffolk County Council  
Flood and Water Management team at Suffolk County Council

**From:** Ryan Mills, Landscape Consultant <Ryan.Mills@essex.gov.uk>  
**Sent:** 26 November 2018 11:14  
**To:** Jack Wilkinson <Jack.Wilkinson@baberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; Landscape <Landscape@essex.gov.uk>  
**Subject:** RE: DC/18/03114 AND DC/18/03115 - LAND SOUTH WEST OF MAIN ROAD, SOMERSHAM, SUFFOLK

Hi Jack,

Based on the revised drawings I am happy for approval to be recommended. This is on the proviso that the following conditions are included:

**Condition 1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT:  
LANDSCAPING SCHEME.**

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, number, location and sizes of the proposed planting. The plans should clearly show the position of new fencing in relation to existing and proposed planting.

*Reason - In the interests of visual amenity and the character and appearance of the area. This condition is required to be agreed prior to the commencement of any development to ensure matters of tree and hedgerow protection are secured early to ensure avoidance of damage or loss due to the development and/or its construction. If agreement was sought at any later stage there is an unacceptable risk of loss and damage to important trees and hedgerow that would result in harm to amenity.*

**Condition 2. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT:  
LANDSCAPE MANAGEMENT PLAN.**

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 5 years. Both new and existing planting and SUDs features will be required to be included in a long-term management plan.


*Reason - To support plant establishment and ensure appropriate management is carried out and to maintain functionality and visual aesthetic.*

If you have any further queries, please let me know.

Kind regards,

**Ryan Mills LMLI BSc (Hons) MSc**  
Landscape Consultant at Place Services

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/18/03115	
<b>2</b>	<b>Date of Response</b>	03/08/2018	
<b>3</b>	<b>Responding Officer</b>	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>All wheeled bins would need to be brought up to the main road for collection, please change the collection points for plots 42, 41, 40, 39, 38, 37 and 36 to be brought up to the minor access road. Presentation points for plot 26-29 need to be plotted on to the plan, are these to have a bin store or to be brought up to the minor road.</p> <p>Ensure that the proposal is suitable for a 32 tonne Refuse Collection Vehicle to manoeuvre around the site and that the surface is suitable for a RCV to drive on. Attached are the vehicle specifications for reference.</p> <div style="text-align: center;">               OLYMPUS - 8x4MS              Wide - Euro 6 - Smo         </div>	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
<b>7</b>	<b>Recommended conditions</b>	Meet the conditions in the discussion.	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.



## Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 0345 60 66 087, Option 1 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk).

AW Site 725/1/0000378

Reference:

Local Mid Suffolk District

Planning

Authority:

Site: Land South West Of Main Road Somersham Suffolk

Proposal: Full Planning Application- Erection of 42 No. dwellings, together with associated public open space, access roads, garaging and car parking. (Duplicate application to DC/18/03114

Planning DC/18/03114

application:

**Prepared by:** Pre-Development Team

**Date:** 14 August 2018

## ASSETS

### Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

## WASTEWATER SERVICES

### Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Somersham (Suffolk) Water Recycling Centre that will have available capacity for these flows

### Section 3 - Used Water Network

The sewerage system at present has available capacity for these flows via a gravity discharge regime only without further consultation with Anglian Water. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

### Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### **FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:**

#### Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

#### Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
  - Development size
  - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
  - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

#### Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
  - Development hectare size
  - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield runoff rate on the following HR Wallingford website -<http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation> . For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)
  - Connecting manhole discharge location
- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)

**From:** David Pizzey  
**Sent:** 16 July 2018 09:29  
**To:** Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** DC/18/03114 Land South West Of, Main Road, Somersham

Gemma

I have no objection to this application as based upon the layout plan there will be little if any conflict between existing trees and the development. Protective barriers will be necessary to help avoid damage during construction to trees along the boundary, this can be dealt under condition.

Regards

David

**David Pizzey** FArborA  
Arboricultural Officer  
Tel: 01449 724555  
[david.pizzey@baberghmidsuffolk.gov.uk](mailto:david.pizzey@baberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)  
Babergh and Mid Suffolk District Councils – Working Together



31 July 2018

Gemma Walker  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

Dear Gemma,

---

*Thank you for requesting advice on this application from Place Services ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application: DC/18/03114**

**Location: Land South West Of Main Road Somersham Suffolk**

**Proposal: Planning Application - Erection of 42 No. dwellings, together with associated public open space, access roads, garaging and car parking. (Duplicate application to DC/18/03115)**

Thank you for re-consulting Place Services on the above application.

**No objection subject to securing biodiversity mitigation and enhancement measures**

**Summary**

We have reviewed the Extended Phase 1 Habitat Survey (Southern Ecological Solutions, June 2018), supplied by the applicant, relating to the likely impacts of development on Protected & Priority habitats and species.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable. We support the reasonable biodiversity enhancements that should also be secured by a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

The ecological mitigation and enhancement measures identified in the Extended Phase 1 Habitat Survey (Southern Ecological Solutions, June 2018) should be secured and implemented. This is necessary to conserve Protected and Priority species.



The development site has been assessed as having a 'Low' value to bats, however, activity surveys have still been recommended (para 5.18, Southern Ecological Solutions, June 2018) due to the sites proximity to Little Blakenham Pit SSSI. This SSSI is designated for its national importance to hibernating bats (Daubenton, Natterers and Brown Long Eared Bats) as well as other habitat features. However, the proposed site is outside the Impact Risk Zone (IRZ) for this SSSI which is situated 2.4km from the proposed site. In addition, out of hibernating species, only Brown Long Eared Bats are considered likely to occupy the site due to its habitat requirements. This information means that it is highly unlikely that direct impacts to the SSSI will be caused by the development. The proposed seasonal bat activity survey is therefore not considered a requirement for this application prior to determination. Consequently, there is a very low likelihood of the designation features of Little Blakenham Pit SSSI being present and affected by this development.

Further bat surveys have also been recommended if any arboriculture works are proposed on a mature oak tree which lies on the boundary of the site. This would involve either an aerial inspection and/or bat emergence surveys to determine whether or not the potential roost features are being used by bats. However, the present layout for the development shows that this feature will be retained. Therefore, no further surveys are currently required.

The site is however situated within the 13km Zone of Influence (ZOI) for the Stour and Orwell Estuaries SPA & Ramsar site which are underpinned by the Stour & Orwell Estuaries SSSI. Natural England's advice to ensure new residential development is compliant with the Habitats Regulations 2017, is that mitigation for likely recreational disturbance impacts *in combination with other plans and projects* is necessary. The LPA is therefore advised that a proportionate financial contribution should be sought from all 1+ residential development within the 13 km ZOI specified, which will need to be secured by legal agreement or via condition of any consent. The LPA will also need to prepare a HRA Appropriate Assessment record to determine any adverse effect on site integrity and then secure the developer contribution for delivery of visitor management at the Stour & Orwell Estuaries SPA & Ramsar site.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

### **Recommended conditions**

#### **1. PRIOR TO COMMENCEMENT: ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**

*"All mitigation measures and/or works shall be carried out in accordance with the details contained in the Extended Phase 1 Habitat Survey (Southern Ecological Solutions, June 2018), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

*This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."*



**Reason:** To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

## **2. PRIOR TO COMMENCEMENT: MITIGATION TO BE AGREED**

*“No development shall be carried out until proposals for the mitigation of the impact of the development on protected Suffolk European Sites have been submitted to and approved in writing by the Local Planning Authority, and the Local Planning Authority has confirmed in writing that the provision of the proposed mitigation has been secured. Such proposals must provide for mitigation in accordance with the emerging joint (Draft) Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy, or for mitigation to at least an equivalent effect. Provide details of the manner in which the proposed mitigation is to be secured.*

*The development shall be carried out in accordance with and subject to the proposals as may be approved.*

*Note:*

*You will need to secure the provision of appropriate habitat mitigation measures before the condition can be discharged. There are two ways in which you will be able to do this. You can either;*

- i. contribute to funding the Council's suite of mitigation projects and secure such provision prior to occupation through a legal agreement between the Council and Developer/Applicant and site owners, or*
- ii. provide your own mitigation project to mitigate the impact of the proposal prior to occupation.*

*You are advised to discuss this matter with the Local Planning Authority prior to submission of details to discharge this condition.”*

**Reason:** In order to safeguard protected wildlife species and their habitats in accordance with the NPPF and Habitats Regulations. This condition is required to be agreed prior to the commencement of any development as any construction process to ensure adequate time for any agreement to be secured and be implemented prior to occupation.

## **3. PRIOR TO OCCUPATION: BIODIVERSITY ENHANCEMENT STRATEGY**

*“A Biodiversity Enhancement Strategy, providing the finalised details and locations of the enhancement measures contained within the Extended Phase 1 Habitat Survey (Southern Ecological Solutions, June 2018), shall be submitted to and approved in writing by the local planning authority.*

*The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.”*

**Reason:** To enhance Protected and Priority Species and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species)



Please contact us with any queries.

Yours sincerely,

**Hamish Jackson GradCIEEM BSc (Hons)**

Junior Ecological Consultant

[Hamish.Jackson@essex.gov.uk](mailto:Hamish.Jackson@essex.gov.uk)

**Place Services provide ecological advice on behalf of Mid Suffolk District Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Dear Gemma Walker,

**Subject: Land South West Of, Main Road, Somersham, Suffolk Ref DC/18/03114**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/03114

The following submitted documents have been reviewed and we recommend an **approval of these application subject to conditions**::

- Flood Risk Assessment and Drainage Strategy Ref 1710-042 Ref A dated Jan 2019
- Phase I/II Geo environmental Assessment ref 1068 R01 Issue 1 Dec 2017
- Planning Layout Ref SOM1 dwg 003
- Site Location plan Ref SOM1-001

We propose the following condition in relation to surface water drainage for this application.

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated January 2019, ref: 1710-042 Ref A) shall be implemented as approved in writing by the local planning authority. The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

2. The 21<sup>st</sup> dwelling hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and all piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

*Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.*

Link <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

3. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
  - a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
    - i. Temporary drainage systems
    - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
    - iii. Measures for managing any on or offsite flood risk associated with construction

*Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses.*



Link <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

#### Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Flood & Water Management  
Growth, Highways & Infrastructure

Suffolk County Council | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX  
T: 01473 260411 | <https://www.suffolk.gov.uk/planning-waste-and-environment/flooding-and-drainage/>

\*\*\*Appendix A to the Suffolk Flood Risk Management Strategy has been updated! If you're involved in the planning, design and construction of new developments this may be of interest to you. You will be expected to comply with this new local guidance. More information can be found here; <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/>\*\*\*

-----Original Message-----

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>  
Sent: 20 February 2019 11:04  
To: RM Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>  
Subject: MSDC Planning Re-consultation Request - DC/18/03114

Please find attached planning re-consultation request letter relating to planning application - DC/18/03114 - Land South West Of, Main Road, Somersham, Suffolk

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: FS/F216232  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 08/08/2018

Dear Sirs

**Land south west of Main Road, Somersham IP8 4PB**  
**Planning Application No: DC/18/03114/FUL**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

**Water Supplies**

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

OFFICIAL

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Enc: Hydrant Requirement Letter

Copy: Mr C Smith, Hopkins & Moore Ltd, Melton Park House, Scott Lane, Melton,  
Woodbridge IP12 1TJ

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: ENG/AK  
Enquiries to: Mrs A Kempen  
Direct Line: 01473 260486  
E-mail: Angela.Kempen@suffolk.gov.uk  
Web Address: www.suffolk.gov.uk

Date: 8 August 2018

**Planning Ref: DC/18/03114/FUL**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land south of Main Road, Somersham IP8 4PB**  
**DESCRIPTION: 42 Dwellings**  
**HYDRANT/S REQUIRED**

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/

OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

**From:** Peter Garrett <[Peter.Garrett@baberghmidsuffolk.gov.uk](mailto:Peter.Garrett@baberghmidsuffolk.gov.uk)>

**Sent:** 15 May 2019 13:51

**To:** Jack Wilkinson <[Jack.Wilkinson@baberghmidsuffolk.gov.uk](mailto:Jack.Wilkinson@baberghmidsuffolk.gov.uk)>

**Subject:** RE: DC/18/03114 AND DC/18/03115 - LAND SOUTH WEST OF MAIN ROAD, SOMERSHAM, SUFFOLK

The developer is correct a LAP does not need to be equipped so I do not have any objection to this part of the proposals now.

I confirm that this open space would not be adopted by the Council, so if the Parish Council is not interested then a management company should be set up.

Peter

Peter Garrett

Corporate Manager for Countryside and Public Realm

Babergh and Mid Suffolk District Councils - Working Together

t: 01449 724944

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w: [www.babergh.gov.uk](http://www.babergh.gov.uk) or [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**MID SUFFOLK DISTRICT COUNCIL**

To: Jack Wilkinson – Senior Planning Officer

From: Sacha Tiller – Housing Enabling Officer – Strategic Housing

Date: 12<sup>th</sup> June 2019

Subject: DC/18/03114 – DC/18/03115

Proposal: Full Planning Application- Erection of 42 No. dwellings, together with associated public open space, access roads, garaging and car parking.(Duplicate application to DC/18/03114)

Location: Land South West of Main Road, Somersham, Suffolk.

---

**Key Points**

**1. Background Information**

<ul style="list-style-type: none"><li>• This is a development proposal for the erection of 42 dwellings.</li></ul>
<ul style="list-style-type: none"><li>• This development triggers an affordable housing contribution under current local policy. 35% affordable housing contribution is required and this equates to 15 dwellings with on-site delivery in the first instance.</li></ul>

**2. Housing Need Information:**

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock

1	46%
2	36%
3	16%
4+	2%

2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

<b>Ref3Estimated proportionate demand for all tenure new housing stock by bedroom number</b>	
Bed Nos	% of total new stock
1	18%
2	29%
3	46%
4+	6%

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households and also for older people who are already in the property-owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa. **724** applicants registered for affordable housing in Mid Suffolk at June 19. The highest registered need is for 1 beds followed by 2 beds. There is a much smaller need for 3+ bedrooms.

2.7 This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the **724** applicants registered is the important number.

### **3. Preferred Mix for Open Market homes.**

3.1 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and want to remain in their local communities.

3.2 There is a strong need for homes more suited to the over 55 age bracket within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality.

3.3 Furthermore, the **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The



types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses.

- Although this is not their first preference, many accept that the private rented sector is their most realistic option.
- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

3.4 This development proposal is a scheme of 42 dwellings. 27 open market and 15 affordable and shared ownership homes. The proposed open market homes incorporates a mix of:

4 x 2 bedroom houses  
10 x 3 bedroom houses  
13 x 4 bedroom houses

We would prefer to see a broad range of house types including bungalows and less 4 bedroom properties. This would enable the scheme to meet a greater range of need in the district.

#### **4. Preferred mix for Affordable Housing**

4.1 This site is a s106 planning obligation site, the affordable homes would be allocated on a district wide basis. The housing register shows a district wide housing need of **724** with a majority of 1 and 2 bedroom homes followed by a smaller need for 3+ bedrooms.

4.2 Current local plan policy looks to deliver affordable rent units and shared ownership dwellings in the first instance to meet housing need and affordability.

4.3 The recommended affordable housing mix on this scheme is as follow:

35% = 15 dwellings – all complying to National Space Standards.

#### **12 x Affordable Rent:**

2 x 3 bedroom 5 person house @ 93sqm  
5 x 2 bedroom 4 person house @ 79sqm  
4 x 1 bedroom 2 person flat @ 50sqm  
1 x 2 bedroom 4 person flat @ 70sqm

### 3 x Shared Ownership Tenure:

1 x 2 bedroom 4 person house @ 79sqm

2 x 3 bedroom 5 person house @ 93sqm

We cannot accept FOG/1.5 storey on site due to legal complications.

### **5. Other requirements for affordable homes:**

- Properties must be built to the Housing Standards Technical guidance March 2015.
- S106 affordable dwellings should be delivered grant free.
- The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 75% of relets in perpetuity.
- For all shared ownership dwellings applicants must be registered with the Suffolk Homebuy agency.
- Initial share purchases for shared ownership dwellings to be capped at 70%.
- The affordable units to be constructed 'tenure blind' and must not be in clusters of more than 15 dwellings. The affordable homes should be distributed across the different phases of the development.
- All flats must be in separate blocks and capable of freehold transfer to an RP. The flatted blocks must provide bicycle storage and bin store areas.
- Adequate parking provision is made for the affordable housing units and cycle storage/sheds.

**From:** Karolien Yperman <Karolien.Yperman@baberghmidsuffolk.gov.uk>  
**Sent:** 20 December 2018 17:24  
**To:** Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** DC/18/03114 and DC/18/03115 Land South West of Main Road, Somersham

Hi Gemma,

Thank you for the re-consultation.

The amended site plan shows that the layout of plots 40-42 has been amended to leave the former plot 42 undeveloped. The size of the dwelling on plot 1 has been reduced, although the height has not, and the design has been simplified. In all, this has reduced the level of less than substantial harm to the nearby listed buildings.

In summary, some of the concerns raised by Heritage in our initial response have been addressed, including the amendment to plot 42, and a reduction in the scale of the building on plot 1. We would still consider that a certain amount of harm would be caused to the character of the area which forms part of the wider setting of the listed buildings, by the addition of two-storey buildings to the front of the site and the use of gault brick in the material palette. Furthermore, the proposed red brick mixes all have a lot of variety in colouring (red, purple, grey and white). A brickwork mix that is more uniform in tones of red would be more reflective of the use of red brick on nearby historic properties, and would therefore likely be more appropriate. Submission of new proposed brick details could be dealt with through a condition.

The proposal in its current form is considered to still cause a low level of less than substantial harm to the significance of the nearby listed buildings, because it would diminish their setting. This harm should be weighed against public benefits as per para. 196 of the NPPF.

If you are minded to approve the application we would recommend the following condition.

- Notwithstanding the material details provided, manufacturer's details of all proposed facing and roofing materials should be submitted.

Kind regards,  
Karolien

**Karolien Yperman BA(Hons) MA**  
Heritage and Design Officer  
**Babergh and Mid Suffolk District Councils – Working Together**

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E: [karolien.yperman@baberghmidsuffolk.gov.uk](mailto:karolien.yperman@baberghmidsuffolk.gov.uk)

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[www.babergh.gov.uk](http://www.babergh.gov.uk) & [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:**Iain Farquharson  
**Sent:**2 Aug 2018 15:38:05 +0100  
**To:**BMSDC Planning Area Team Blue  
**Cc:**Gemma Walker  
**Subject:**245689: MSDC Planning Consultation Request - DC/18/03114

Dear Ms Walker

Having reviewed the application documents we find that the sustainability statement is very woolly, eg a suggestion that dwellings will use wood burners but only a handful of plots have chimneys, also the applicant is considering pv but again elevations/plans not showing indicative pv and whether the required amount would fit. A further example is the section labelled water conservation does not actually provide any detail about water conservation.

In all the document is too vague to support a full application therefore we recommend refusal of planning permission.

Iain Farquharson

Senior Environmental Management Officer  
Babergh Mid Suffolk Council

BB01449 724878 / 07860 827027  
//iain.farquharson@baberghmidsuffolk.gov.uk

-----Original Message-----

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>  
Sent: 13 July 2018 14:53  
To: Environmental Health <Environmental@baberghmidsuffolk.gov.uk>  
Subject: MSDC Planning Consultation Request - DC/18/03114

Please find attached planning consultation request letter relating to planning application - DC/18/03114 - Land South West Of, Main Road, Somersham, Suffolk

Kind Regards

Planning Support Team

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**Subject:**FW: MSDC Planning Consultation Request - DC/18/03114

**From:** Rod Caird [mailto:somersham.pc@outlook.com]

**Sent:** 07 September 2018 09:19

**To:** BMSDC Planning Area Team Blue

**Cc:** James Caston (Cllr); Keith McKeown; Stephen Wright; Samantha Barrell; William Caston Cook; Shaun Innes Whiting

**Subject:** Re: MSDC Planning Consultation Request - DC/18/03114

### **18/03114 and 03115: 42 new homes on land South West of Main Road, Somersham**

This application (and its duplicate) was discussed at a meeting of Somersham Parish Council on September 5, 2018

The Parish Council objects to the application on the following grounds:

- Inadequate provision has been made for the dispersal of flood water on the site, where there is an existing problem regularly affecting Main Road
- There is inadequate provision for the disposal of foul water from the site
- There are serious problems of access to and from the site and Main Road. Visibility of 90 metres in each direction from the entrance to the site has not been established. Increased traffic in these circumstances causes unnecessary danger to drivers, pedestrians and cyclists
- The close proximity of the site to Grade Two listed buildings - the Duke of Marlborough Public House and Kings Cottage, Lower Somersham Post Office, Street Farm - is incompatible with the setting and outlook of those properties and therefore directly conflicts with an essential element of the heritage listings.
- The Parish Council is also reflecting the near-unanimous view of local residents, expressed at a special meeting in June and in frequent messages and conversations, that the above planning problems should lead directly to refusal of the application.

Rod Caird

Clerk, Somersham Parish Council

26 Church Lane,

Henley IP60RQ

[somersham.pc@outlook.com](mailto:somersham.pc@outlook.com)

On 13 Jul 2018, at 14:50, [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) wrote:

Please find attached planning consultation request letter relating to planning application - DC/18/03114 - Land South West Of, Main Road, Somersham, Suffolk

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

<ufm104.pdf>

# Agenda Item 7b

## Committee Report

**Item 7B**

**Reference:** DC/18/05313  
**Case Officer:** Mark Russell

**Ward:** Battisford and Ringshall

**Ward Member:** Cllr Daniel Pratt

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### RECOMMENDATION – Refusal

#### Description of Development

Outline Planning Application (Access and Layout to be considered) Erection of 32No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

#### Location

Land On The South Side Of Bildeston Road, Offton

**Parish:** Offton

**Expiry Date:** 28.02.2019

**Application Type:** Outline

**Development Type:** Residential

**Applicant:** Mr & Mrs Stephen Phillips

**Agent:** Country House Developments Ltd

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### PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reasons:

- It is a 'Major' application for the erection of more than 15 dwellings

#### Details of Previous Committee/Resolutions and Member Site Visit

None.

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### PART TWO – POLICIES AND CONSULTATION SUMMARY

#### Summary of Policies

Relevant policies in the Core Strategy Focused Review 2012 and Mid-Suffolk Local Plan 1998:

CS01 - Settlement Hierarchy

CS02 - Development in the Countryside & Countryside Villages

CS03 - Reduce Contributions to Climate Change

CS04 - Adapting to Climate Change  
CS05 - Mid Suffolk's Environment  
CS06 - Services and Infrastructure  
FC02 - Provision And Distribution Of Housing  
FC01 - Presumption In Favour Of Sustainable Development  
FC01\_1 - Mid Suffolk Approach To Delivering Sustainable Development  
CS12 - Retail Provision  
GP01 - Design and layout of development  
HB08 - Safeguarding the character of conservation areas  
H4 – A proportion of affordable housing in new housing developments  
H13 - Design and layout of housing development  
H16 - Protecting existing residential amenity  
E12 - General principles for location, design and layout  
T09 - Parking Standards  
T10 - Highway Considerations in Development

National Planning Policy Framework (NPPF)

Supplementary Planning Documents  
Suffolk Adopted Parking Standards (2015)

### **Consultations and Representations**

During the course of the application consultation and representations from third parties have been received. These are summarised below.

#### **A: SUMMARY OF CONSULTATIONS**

##### **Parish Council**

Offton and Willisham Parish Council:

Summarised as follows:

- There is a prior history of refusal on this 'Green' site
- There is no Economic Infrastructure to support the development
- It is in direct conflict with both the Parish Council's and MSDC's future planning
- It negatively impacts on Public Rights of Way and on Public Rights to enjoy Open Countryside
- It ignores the problems of sewerage and flooding and contamination of the village
- It negatively impacts on the Environment & decimates the habitats of existing Wildlife
- It provides no economic or community benefit for the Parish or wider community
- It incorrectly states the Parish Council's support and supposed benefits



### Somersham Parish Council:

Noting that the proposed development is in the neighbouring parish of Offton, Somersham councillors nevertheless felt that a consequence, if it goes ahead, would be increased traffic volumes in Somersham, which already has difficulty in dealing with existing traffic flows. Road design in the village includes hazardous pinch points and increased traffic levels will add to existing problems. In addition, it was felt that construction traffic, during the build phase of the development, will need to be directed to use main roads rather than further congesting single track and minor routes.

### **Historic England**

No comments

### **SCC Infrastructure**

Responded in full, explaining how CIL spending would be allocated. No additional s.106 payments were requested.

This response was given just over six months ago, so strictly speaking is slightly out of date. SCC Infrastructure has been asked for an updated response which will appear on the late papers.

### **Environment Agency**

02/01/19 Initial holding objection as site is within Flood Zones 3b (the functional floodplain), 3a, 2 and 1. The sequential test should be applied. If this is satisfied, then the Flood Risk Assessment requires amendment. Also objected on foul drainage and ecology grounds.

15/03/19 Removed climate change aspect of objection, but objection was maintained regarding flood risk overall as the submitted documentation did “not adequately address all of the issues raised previously.”

Maintained objection to bridge and channel works. Opposed culverting, stating “full consideration should be given to application for a clear-span bridge structure” adding “Modelling will need to be provided to demonstrate that the crossing structure will not increase flood risk.”

Also maintained Ecology objection, stating “The interference with the channel will impact negatively on the watercourse habitat”;

Foul Drainage,” The applicant must try every means to connect to mains foul drainage in the area. Not connecting to the existing foul sewer must be justified by the applicant after consultation with Anglian Water.”

15/04/2019 Following submission of details of an open-spanned bridge, the EA removed its Flood Risk and Ecology holding objections, subject to the development complying with the amended drawing 500/OP0112/C dated March 2019.

Foul drainage objection was maintained at this point.

24/04/2019 “Following the submission of further information to us on 23 April 2019 we are removing our Foul Drainage holding objection.”

Therefore, ultimately no objection.

### **Waste Services**

No objection, subject to conditions.

## **Rights of Way**

Public Footpath 26 is recorded through the proposed development area. No objections, but suggested informatives.

## **Landscapes**

Following amendments and clarifications, no objections, but raised the following points:

- There are no details as to how the POS and Community Grazing Land will be protected against future development. Therefore we would advise a restrictive covenant is imposed.
- The layout and positioning of the 'Public Community Park' should be reconsidered to include passive surveillance and active frontages from Plots 25-32.

Several conditions, including those relating to advanced planting, were also proposed.

## **Heritage**

No comments

## **Sustainability**

Welcome inclusion of Community open space; however, further commitment to CO2 reduction and renewable technologies required.

## **Suffolk Wildlife Trust**

Broadly satisfied with the findings of the Interim Ecological Impact Assessment, but voiced concerns over the potential subsequent expansion of the housing. Asked that the recommendations of the consultant's report be implemented.

## **Strategic Housing**

Affordable housing - 11 Affordable units are required (Mid Suffolk requires 94 affordable dwellings per annum). This should generally be one and two-bedroomed units.

Open Market housing – The mix of four and five-bed houses is not acceptable as it does not respond to identified need.

The offer of nine "local needs" units and two "affordable" is not acceptable and is not line with current local allocation policy requirements.

Therefore object.

## **County Archaeological Service**

This site represents a relatively large area which has not been systematically assessed for archaeological remains. There are hints of Iron Age and Roman activity recorded from findspots in the wider area (County Historic Environment Record OFF 021, OFF 014, OFF 006), and topographically the site lies on a slope over a watercourse. There is potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework 2018 (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Two standard conditions were then proposed.

## **County Fire and Rescue Service**

No objection – as standard, advised that access to buildings for fire appliances should meet with Building Regulations conditions and that fire hydrants should be installed and that a sprinkler system be installed.

## **Planning Policy**

The emerging JLP document contains a significant amount of evidence and justification work that has been undertaken. Therefore, it is important for the case officer to consider the direction the emerging joint plan is heading in for the purposes of decision-making. The latest NPPF (July 2018) emphasises the importance of a joint up plan-led approach.

The site in question was put forward for consideration through the 'call for sites' (Aug 2017) policy consultation (site ref: SS0160), the site was discounted. Since this time the site has been put forward further, also referenced as SS0160 for the purpose of consistency.

Offton is currently not designated as a settlement *per se* in accordance with any current adopted documents; consequently this also shows the rural nature of the area seen as countryside. The existing pattern and form of existing development is minor scattered rural clustered development, which meanders around poor rural road networks that lack services, facilities or quality infrastructure that is capable to accommodate major development. The emerging JLP is in the process of designating Offton as a Hamlet settlement classification, which is an unsustainable classification for major growth.

The proposal represents a disproportionate level of major growth within a remote rural location that would continue to create a detached, rural clustered approach. This does not sustainably align with the direction of the emerging JLP or address cumulative social or environmental impacts that would be a consequence of the major proposal in this remote rural location poorly connected to services, facilities or any main settlement.

There are known flooding issues in the area and a small part of the site is within flood zone 3. The majority of the site is within a Special Landscape Area - Rolling Valley Farmlands therefore there is landscape impacts to be considered in this remote rural location. Furthermore there is a SSSI site located less than 200m to the north of the site, which all interlinks with the environmental and ecological connections of the site to the wider rural connections.

The site is not considered suitable and the planning policy team recommends the application is refused.

The policy team have not assessed this application from a detailed material consideration perspective (such as fully understanding planning constraints or planning history of the site) only broadly looked at the site from a principle perspective and explained at what stage emerging planning policy documents are at for appropriate consideration and weighting by the case officer in their planning assessment and weighted decision. Therefore, there may be further detailed material issues with this site.

## **Economic Development**

No comments.

## **Tree Officer**

I have no objection to this application. The trees proposed for removal are of insufficient value to warrant being a constraint and the protection measures outlined for those scheduled for retention are in accordance with good practice.

## **Place Services - Ecology**

Initially a holding objection due to insufficient information and raised concerns that Natural England had not commented on the nearby Middle Wood. A dormice survey has now been submitted

### **Natural England**

Standard comments, plus a request for a contribution to the RAMS (Stour and Orwell estuaries)

### **BMSDC Air Quality**

No comments.

### **BMSDC Land Contamination**

No objection, asked to be notified if unexpected contamination was identified.

### **Travel Plan Officer**

Thank you for consulting me about the proposed residential development at Land on the South Side of Bildeston Road in Offton. I have no comment to make, as the existing sustainable transport infrastructure is limited for commuting purposes, in addition to the development being too small to justify a Travel Plan in accordance with national planning guidance.

### **Suffolk Police**

Voiced concerns over the site's permeability and also stated its preference for each dwelling to have a garage. Concerns about security at the allotment, proposed security lighting. Asked that all footpaths be at least 3 metres wide and gave various other recommendations in terms of landscaping and so on.

### **SCC Flood and Water**

Following extensive correspondence, the Floods team withdrew an initial objection, stating:

*Looking at the second set of results produced by AF Howlands Associates from December 2018, it does appear that an acceptable worst case rate of infiltrations... would be (achievable).*

*Its normally required that 3 trial pits are dug and tested. In this instance I note that only 2 trail pits have been dug and tested, and of these trial pits only one was in the area proposed to be developed.*

*However, as the applicant has a second viable method for the disposal of surface water e.g. controlled discharge to a watercourse, then I could condition further testing if the LPA is minded to approve this application.*

### **SCC Highway Authority**

Following the submission of revised drawing No. 500/DP/004-A, the holding objection (which had been based on visibility splays and layby parking and parking being too close to junctions) was removed subject to standard conditions:

- Visibility splays;
- Details of roads;
- Carriageways/footways to binder level prior to occupation;
- Details of access/gradients/surface water drainage etc.;
- Construction Management Plan;
- Details of areas for loading/unloading/manoeuvring/parking of vehicles (inc. electric charging);
- Details of storage of refuse/recycling.

## **B: REPRESENTATIONS**

Thirty-eight letters of representation have been received. All of these are objections and raise the following points:

- Overdevelopment;
- Not needed;

- Unsustainable location;
- Bridge will cause blockage of stream and erosion;
- Would ruin the character of the village;
- Loss of high-grade agricultural land;
- Massive disruption, noise/dust from the construction phase;
- Lack of existing facilities (including schools);
- Policy presumption against housing;
- Parking layout (tandem) will lead to problems;
- Road not wide enough for cars to pass each other;
- Increased traffic;
- Bend in road is dangerous;
- Brownfield sites in Willisham should be used first;
- Allotments not required;
- Car parking area excessive;
- Would be detached from the village;
- Light pollution;
- Concern about wildlife;
- Proximity to SSSI;
- Biodiversity aims are unclear;
- Who would be responsible for upkeep of the community orchard, wildflower meadows, etc.
- Addition of a bridge would be dangerous;
- More low-cost housing is needed;
- Who would be responsible for surface water drainage?
- Pre-application advice (to liaise with the Parish) has been ignored;

## **PART THREE – ASSESSMENT OF APPLICATION**

### **1.0 The Site and Surroundings**

- 1.1 The development site is currently agricultural land in a rural location sloping south and westwards. This is contiguous with, but outside the village of Offton.
- 1.2 To the north is Bildeston Road (separated from the site by a narrow woodland and a steep-sided watercourse known as “The Channel”). Just over a dozen houses line Bildeston Road’s northern side. To the east are the shallow gardens of Castle Road, separated from the site by a Public Right of Way (PRoW).
- 1.3 The southern and western boundaries of the site are rural, incorporating further agricultural fields, with Castle Cottage in the south-western corner the only stop to long expanses of uninterrupted open country.

### **2.0 The Proposal**

- 2.1 The proposal is an Outline Application , with access and layout being considered, for the erection of 32 No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and a public reading room. Also in the application is the creation of new accesses to Bildeston Road and Castle Road, nine parish allotments and a community car park.

### 3.0 The Principle of Development

- 3.1 At the heart of this application is the consideration as to, notwithstanding any other matters, whether there is an overarching acceptance or opposition to development on this site. Whilst all material considerations must be weighed, the fundamental spatial element must first be considered.
- 3.2 Core Strategy Policy CS1 states that development should be directed towards the larger towns and villages in the Settlement Hierarchy, designating all other sites as “countryside” adding “the countryside that surrounds Mid Suffolk settlements.....will be protected for its own sake.” Whilst Policy CS2 makes clear: “In the countryside, development will be restricted to defined categories in accordance with other Core Strategy policies.” The site does not fall under the defined categories, so given that it is not within any Built-up Area Boundary (BUAB), it is thus defined as “countryside”, there is a clear policy presumption against development here.
- 3.3 However, CS1 and CS2 were criticised by the Inspector at the Woolpit appeal (APP/W3520/W/18/3194926) for being non-NPPF-compliant; he thus afforded them very limited weight.
- 3.4 The NPPF (2018, revised 2019) states, at paragraph 11, “Plans and decisions should apply a presumption in favour of sustainable development.”
- 3.5 This is further clarified:
- For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>6</sup> ; or;*
  - ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 3.6 This invites us to consider the NPPF as a whole and, in particular, Chapter 2 “Achieving Sustainable Development” where paragraph 7 plainly states: “The purpose of the planning system is to contribute to the achievement of sustainable development.”
- 3.7 Sustainable development is then broken down in to three key “overarching objectives”: economic, social, environmental, which should all be considered together.
- 3.8 Is the development, therefore, sustainable?
- 3.9 Offton is described in Core Strategy Policy CS1 as a “Countryside Village” where development should be avoided, lacking the necessary services and giving rise to car-dependency. But this requires further analysis.
- 3.10 In terms of day-to-day living; Offton is a small village (358 inhabitants in the 2011 Census) and has no schools or shops, but does have a village hall nearby and a public house 1.5km away. These limited facilities are augmented by a weekly fish and chips van and a bi-weekly mobile library.
- 3.11 There is a limited bus service (thrice daily) between Ipswich and Hitcham.
- 3.12 In a purely environmental sense, the site cannot be held to be sustainable as much of the day-to-day living would be dependent on car use to access other settlements such as Needham,

Stowmarket or Ipswich. Whilst the proposed addition of facilities such as allotments is noted, this is not sufficient to outweigh this concern.

- 3.13 Economically, beyond the short-term gain for builders, the 32 dwellings would provide additional spend from the occupiers on local shops and services, but these are far flung and would not likely benefit the village or its amenities, beyond a possible boost to trade at the Limeburners public house. Indeed once occupiers need to use a car to access services they are more likely to access the wider opportunities available in Ipswich and Stowmarket, so this benefit is extremely limited.
- 3.14 Socially, the development could provide some housing for locals (although this is not a guarantee, as the “local needs” housing has not been recognised as such by our Strategic Housing team). Although it is next to the existing village, it is not well physically integrated, being separated from it by a watercourse or trees. It is accepted that the allotments, community grazing land and “Reading Room” would, over time, act as foci for social cohesion.
- 3.15 On balance, however, the development is held to be unsustainable due to its location remote from services and future occupiers’ heavy reliance on the motor vehicle, without benefits in the other strands of sustainable development to outweigh this.

#### **4.0 Site Access, Parking and Highway Safety Considerations**

- 4.1 Access is one of the two matters being considered in this Outline application (the other being layout, but with issues such as design and landscaping being left to the Reserved Matters application).
- 4.2 The Highway Authority has not ultimately objected to the proposal, with the proposed access and visibility splays being acceptable.
- 4.3 Parking layout is largely satisfactory, although there are five incidences of “triple parking.” These are harmless and do not have a profound impact on other road users.

#### **5.0 Design and Layout**

- 5.1 Policy CS5 requires development to be of a high quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district; whilst Policy GP1 of the Local Plan states that proposals comprising poor design and layout will be refused. Members will be aware that both policies have been commented upon in the Woolpit appeal for compliance with the NPPF.
- 5.2 Paragraph 56 of the NPPF attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development.
- 5.3 Although the application at hand is Outline, layout is a matter applied for here, and therefore requires consideration.
- 5.4 The eastern side of the site is given over to the housing development, with a road to its western edge, accessed from Bildeston Road to the north, then becoming unadopted at the southern end where it leads to Castle Road.
- 5.5 A water treatment facility and associated parking is found at the northern end and the housing is located within three pockets divided by east-west estate roads.
- 5.6 Houses generally address street frontages, with side parking. However, some have front parking, especially at the northern end of the site.
- 5.7 Garden sizes and parking provision are satisfactory, and overall the layout is acceptable.

## **6.0 Landscape Impact, Trees, Ecology, Biodiversity and Protected Species**

- 6.1 Policy CS5 of the Core Strategy seeks to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encouraging development that is consistent with conserving its overall character.
- 6.2 Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils.
- 6.3 Policy CS5 of the Core Strategy requires development to protect, manage and enhance Mid Suffolk's biodiversity.
- 6.4 Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) requires all 'competent authorities' (public bodies) to 'have regard to the Habitats Directive in the exercise of its functions.' For a Local Planning Authority to comply with regulation 9(5) it must 'engage' with the provisions of the Habitats Directive.
- 6.5 Paragraphs 174-177 of the NPPF instruct Local Planning Authorities in terms of ecology. In this instance, given the largely developed/hard-surfaced or lightly-treed nature of the site, there are no serious concerns.
- 6.6 There has been much correspondence with the applicant on this front, including correspondence with Natural England and the Suffolk Wildlife Trust. Ultimately there is not now an objection on that front, but a contribution for Recreational Disturbance Avoidance Mitigation (RAMS) has been requested by the former.
- 6.7 The application is supported by a Tree Survey which shows trees to be protected and does not raise any issues.
- 6.8 Whilst landscaping is a reserved matter, the site is visually important and is part of a Special Landscape Area. For this reason, the applicant was requested to provide a visual impact assessment. This has been assessed by the experts at Place Services who, whilst having some concerns, have withdrawn their objection.

## **7.0 Land Contamination**

- 7.1 There are no known issues and our expert has just asked to be advised should any unexpected contamination emerge.

## **8.0 Heritage Issues**

- 8.1 Policy HB1 of the Local Plan seeks to protect the character and appearance of buildings of architectural or historic interest, particularly protecting the settings of Listed Buildings. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Listed Building or its setting.
- 8.2 Paragraph 192 of the NPPF states "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.”

8.3 In this instance, there are no Listed Buildings or Conservation Areas nearby and there are no identified matters of concern other than archaeology. Our Heritage team has not objected.

8.4 In terms of archaeology, the County specialist has advised that there may be some potential for finds and this is covered by condition.

## **9.0 Impact on Residential Amenity**

9.1 Policy H16 of the Local Plan seeks to protect the existing amenity of residential areas.

9.2 Much of the site is free from such concerns. However, there is an interface with, the neighbouring properties to the east on Castle Lane. Given the distance and the tree-lined footpath which separates the properties, there is not held to be a concern. The matter of potential overlooking would be dealt with at the Reserved Matters stage, where, for example, some of the houses could be bungalows, or have their fenestration re-ordered such as to remove any overlooking.

9.3 Construction hours can be managed by planning condition, to ensure the construction phase of development is carried out in a manner that safeguards neighbouring residents' amenity.

9.4 There are no unacceptable issues of residential amenity which would warrant refusal.

## **10.0 Flooding and Drainage**

10.1 As detailed within the relevant consultation sections above, the matter of floods has been extensively explored, with the Environment Agency and with the Local Lead Floods Authority (LLFA) at Suffolk County Council. The former is content that the developable part of the site will not be in zones 2 or 3 and has agreed to the amended bridge design. The LLFA has agreed to the applicant's second viable method for the disposal of surface water – i.e. controlled discharge to a watercourse. Both bodies have suggested conditions and this matter is, therefore, dealt with.

## **11.0 Affordable Housing**

11.1 The applicant has offered a deficient amount of affordable housing (two units, where eleven would be required by policy), in addition 9 “Local Need Homes” are being offered. However, our Strategic Housing team does not recognise or accept what is being offered.

11.2 Discussions have flowed from this and a recent exchange between the applicant and Strategic Housing explains where the differences lie:

11.3 The applicant has stated: *“Our client was approached by the Parish Council in 2017 to explore the possibilities of placing 9 Local Need Homes on the site together with community benefits. The Parish introduced Hastoe Housing who looked into this site and around 9 other sites within the Parish. Each of the sites was analysed under the guidance of MSDC Planning Officers, all of the sites were deemed to be inappropriate except our client's site. Our client's site was considered to be ideal from a locational perspective but requiring considerable infrastructure delivery in order to make the scheme viable. At this point the landowner approached Country House Homes to work with the Parish Council and Hastoe Housing to find a way of delivering the 9 Local Need Homes and community benefits....”*

11.4 *Whilst I appreciate that our hybrid development proposal would not be viewed as a classic Rural Exception Site there are direct parallels that question whether the current Local Planning Policies*

utilised by the housing officer are up to date and have the degree of efficacy that the latest edition of the NPPF seeks to attain. The proposed scheme is a community benefit led submission which seeks to provide first and foremost, Local Need Housing, 5 acre Local Nature Reserve (including parish allotments, landscape buffer, community grazing and public open space) and General Need Affordable Homes. The secondary addition in order to meet with the cost of delivery to the bridge/infrastructure, the lack of grant funding and depth of community benefits are the Open Market Homes...

11.5 *In light of the above we do not wish to change our affordable housing provision from that proposed and trust that the council will find a way in which to support our proposal in this regard."*

11.6 Our Strategic Housing Officer has reaffirmed Strategic Housing's position: *" I have been working with Hastoe and the Parish for several years to find a suitable site for a rural exception site and a rural exception site by nature is evidenced from a housing needs survey which was specifically carried out for a RES. This is not a transferable item to provide evidence for this scheme without prior consent from Community Action Suffolk. I also refer you to the Parish comments of 8<sup>th</sup> Jan 2019 objecting to this proposal.*

*The housing mix does not provide a broad spectrum of housing, the proposed affordable tenure shared equity is not the Council's preferred tenure - first time buyers generally struggle to afford such homes.*

*I have seen no evidence as to why they are departing from local requirements on tenure and would require evidence as to why they believe this meets the greatest housing need."*

11.7 Matters of affordable housing provision have, therefore, not been satisfied, such that the proposal would be contrary to Local Plan Policy H4.

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## **PART FOUR – CONCLUSION**

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### **12.0 Planning Balance and Conclusion**

12.1 The proposal at hand would supply 32 additional dwellings, including affordable homes. This would contribute to Mid Suffolk's five-year housing-land supply.

12.2 However, the amount of affordable housing being offered does not comply with policy requirements.

12.3 The location is such that the proposal constitutes unsustainable development, in conflict with the NPPF.

12.4 Therefore the application is recommended for refusal for the above reasons.

### **13.0 RECOMMENDATION**

13.1 Refusal for the following reasons:

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. This has three strands – environmental, social and economic; all of which must be considered together.

Policy FC1 of the Core Strategy Focused Review (2012) states that Mid Suffolk will take a positive approach to development, and will take into account whether any "adverse impacts of granting

permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the National Planning Policy Framework taken as a whole...”

Policy CS1 of the Mid Suffolk Core Strategy (2008) states that: “ countryside and countryside villages and development will be restricted to particular types of development to support the rural economy, meet affordable housing, community needs and provide renewable energy.”

The emerging Joint Local Plan is in the process of designating Offton as a Hamlet settlement classification, which is an unsustainable classification for major growth.

In this context, the proposal represents a disproportionate level of major growth within a remote rural location that would continue to create a detached, rural clustered approach. This does not sustainably align with the above policies, nor with the NPPF, nor with the direction of the emerging Joint Local Plan. Nor does it address cumulative social or environmental impacts that would be a consequence of the major proposal in this remote rural location poorly connected to services, facilities or any main settlement.

Core Strategy policy H4 states that Mid Suffolk shall “seek to negotiate an element of affordable housing of up to 35% of the total provision of housing”. It is clear that the applicant will not be providing this amount of affordable housing. Policy H5 seeks to provide affordable housing as a “Rural Exception” for local people in small rural settlements, backed up by proof of local needs. This has not been achieved to the satisfaction of The Council’s Strategic Housing Officers and, therefore, the provision does not contribute to the social strand of sustainability.

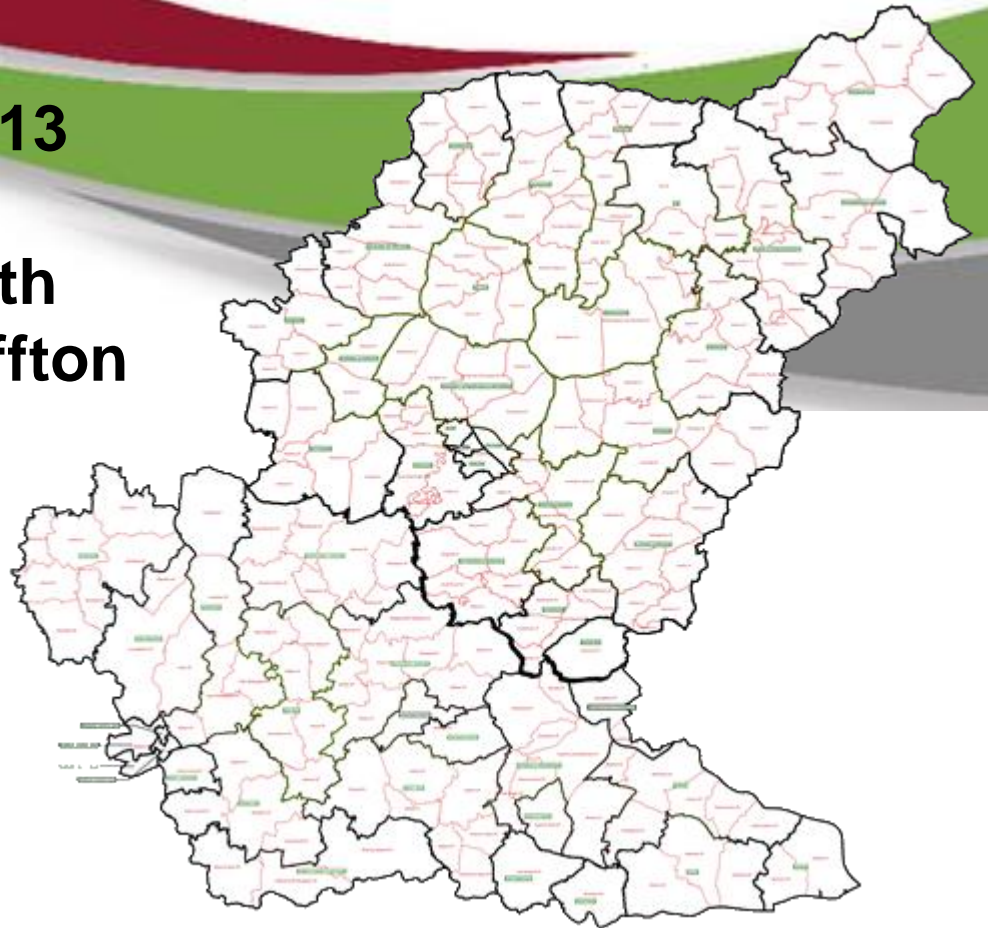
Given the unsustainable location, and also the inadequate quantum and inappropriate mix of proposed affordable housing, the proposal is held to be contrary to Policy FC1 of the Core Strategy Focused Review (2012), Policy CS1 of the Mid Suffolk Core Strategy (2008) and Policy H4 of the Mid Suffolk Local Plan (1998) and the NPPF.

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**Application No: DC/18/05313**

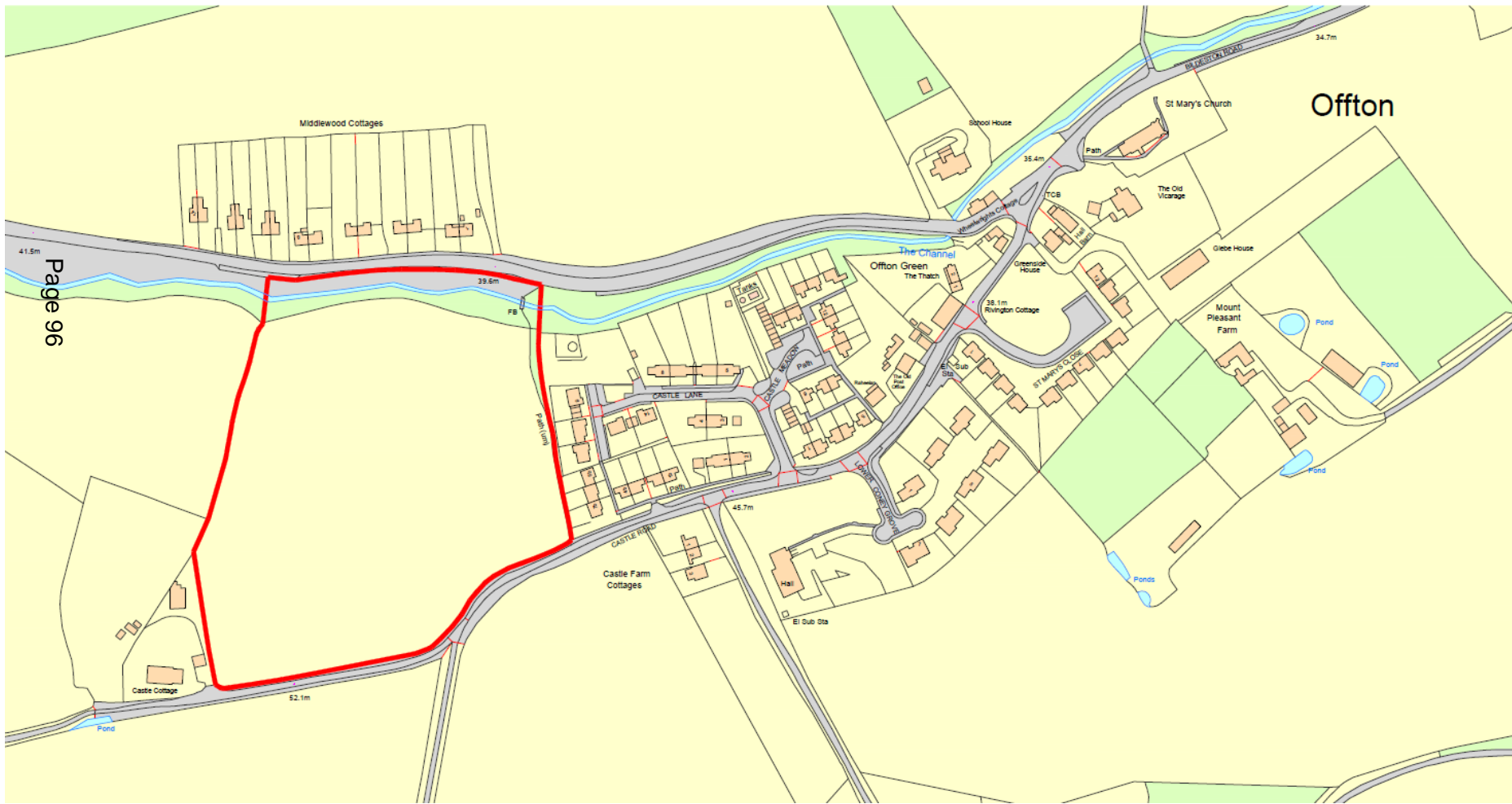
**Address: Land on the South  
Side of Bildeston Road, Offton**

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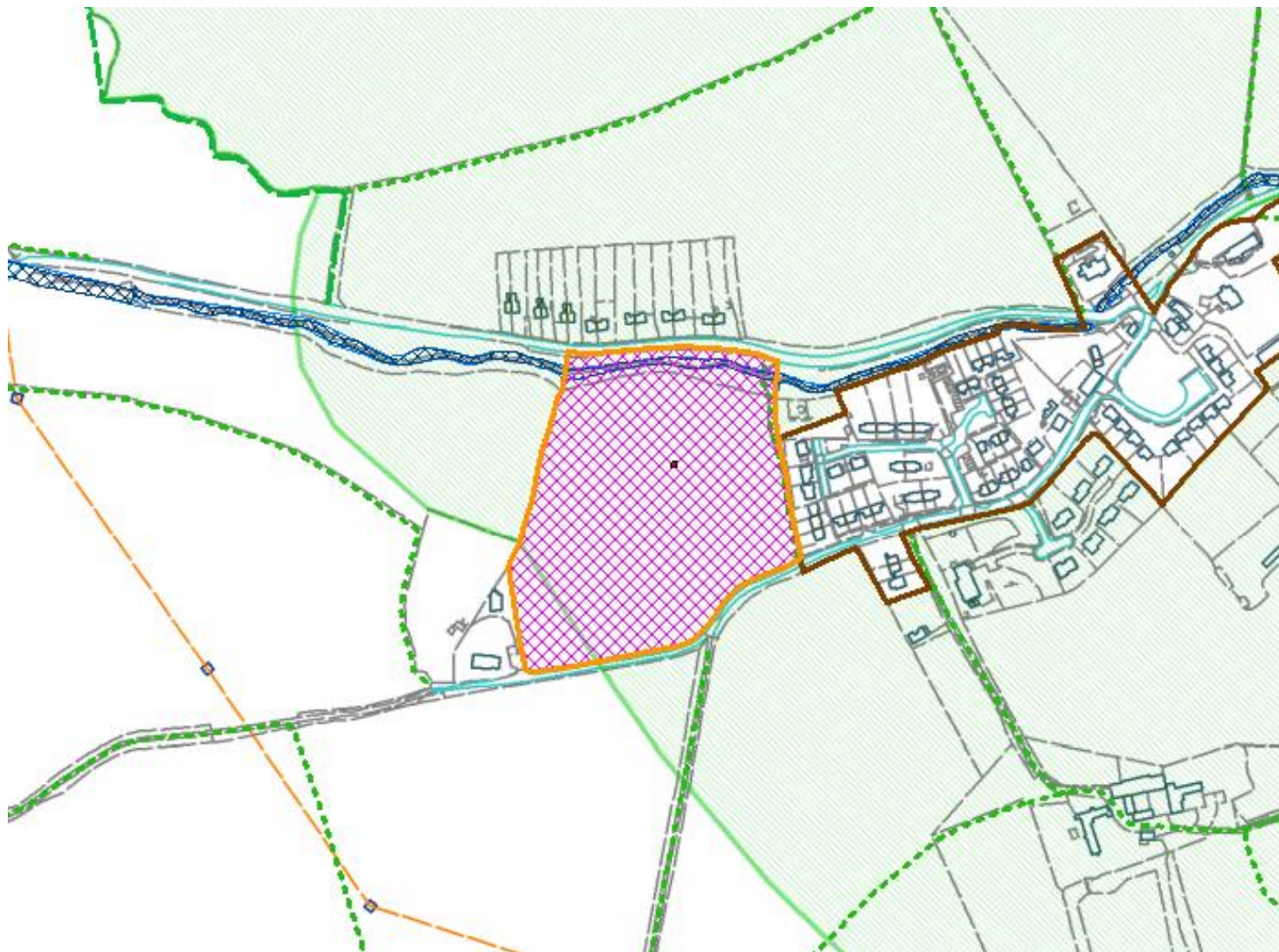
# Site Location Plan

Slide 2



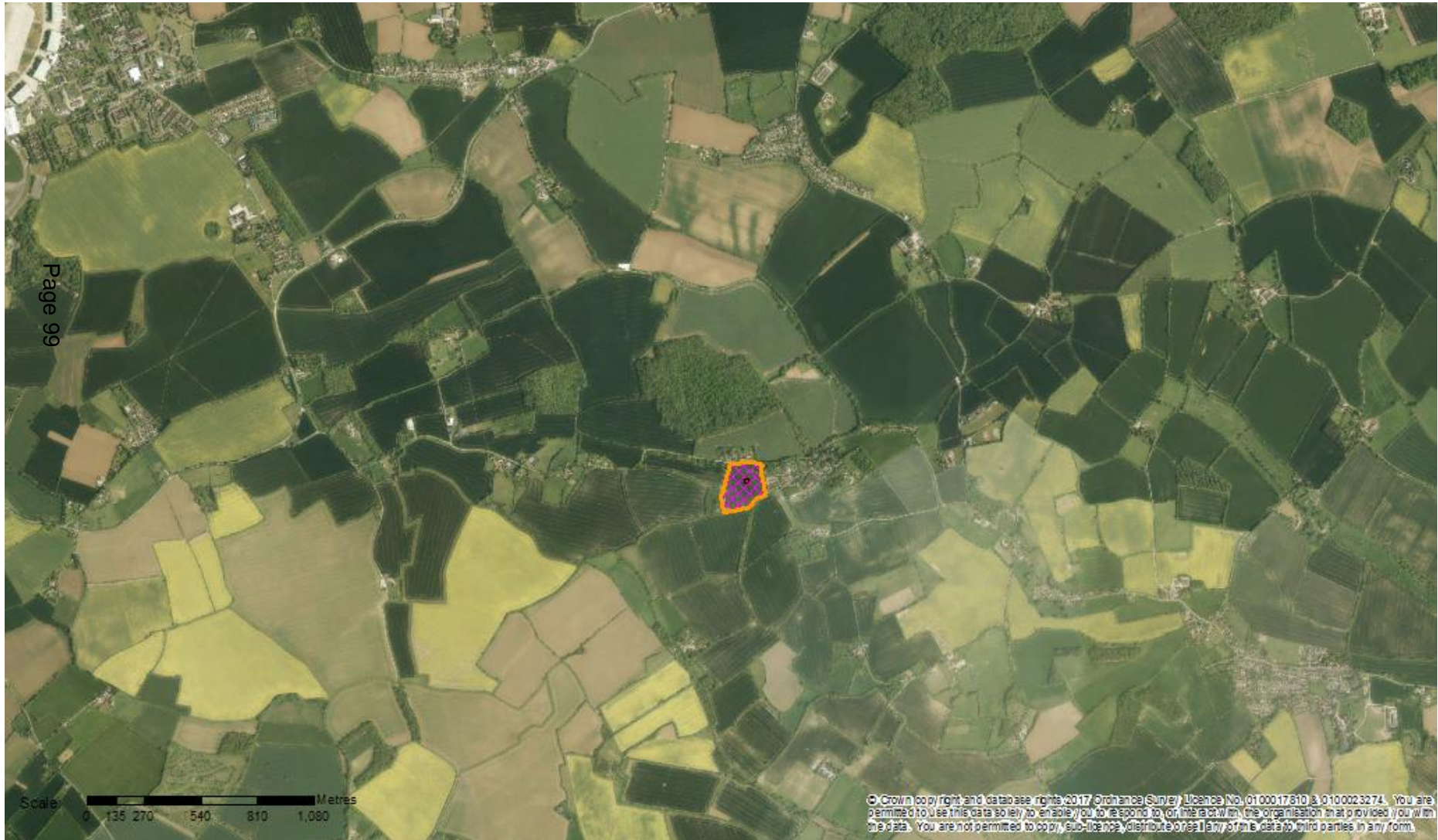
# Constraints Map

-  Built Up Area Boundaries
-  Special Landscape Area
-  Public Rights of Way
-  Flood Zone 2
-  Flood Zone 3









# Block Plan/Site Layout



PROPOSED SITE LAYOUT PLAN - 1:500

# Parking Plan 1

SCC Parking Provision Guidance for use class C3		
1 Bed Homes	1 Spaces Per Dwelling, Cycle storage for 2 no. cycles.	
2 Bed Homes	1.5 Spaces Per Dwelling, Cycle storage for 2 no. cycles.	
3 Bed Homes	2 Spaces Per Dwelling, Cycle storage for 2 no. cycles.	
4 Bed Homes	3 Spaces Per Dwelling, Cycle storage for 2 no. cycles.	
5 Bed Homes	3 Spaces Per Dwelling, Cycle storage for 2 no. cycles.	
Visitor Spaces	0.25 Spaces Per Dwelling	
Proposed Parking Standards For Scheme		
Plot 1 - 3 Bed	1 Independent Space in Garage & 1 Independent Space to Driveway	2
Plot 2 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 3 - 2 Bed	1 Independent Space to Driveway with 0.5 Visitors spaces allowed	1.5
Plot 4 - 2 Bed	1 Independent Space to Driveway with 0.5 Visitors spaces allowed	1.5
Plot 5 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 6 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 7 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 8 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 9 - 1 Bed	1 Independent Space to Shared Parking Court	1
Plot 10 - 1 Bed	1 Independent Space to Shared Parking Court	1
Plot 11 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 12 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 13 - 3 Bed	1 Independent Space in Garage & 1 Independent Space to Driveway	2
Plot 14 - 3 Bed	1 Independent Space in Garage & 1 Independent Space to Driveway	2
Plot 15 - 4 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 16 - 4 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 17 - 4 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 18 - 2 Bed	1 Independent Space to Driveway with 0.5 Visitors spaces allowed	1.5
Plot 19 - 2 Bed	1 Independent Space to Driveway with 0.5 Visitors spaces allowed	1.5
Plot 20 - 3 Bed	1 Independent Space in Garage & 1 Independent Space to Driveway	2
Plot 21 - 2 Bed	2 Independent Spaces to Driveway	2
Plot 22 - 3 Bed	2 Independent Spaces to Driveway	2
Plot 23 - 4 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 24 - 4 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 25 - 4 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 26 - 5 Bed	2 Independent Spaces in Garage & 1 Independent Spaces to Driveway	3
Plot 27 - 4 Bed	2 Independent Spaces in Garage & 1 Independent Spaces to Driveway	3
Plot 28 - 5 Bed	2 Independent Spaces in Garage & 1 Independent Spaces to Driveway	3
Plot 29 - 5 Bed	2 Independent Spaces in Garage & 1 Independent Spaces to Driveway	3
Plot 30 - 5 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 31 - 5 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Plot 32 - 5 Bed	1 Independent Space in Garage & 2 Independent Spaces to Driveway	3
Visitor Spaces	Unallocated visitor spaces	6
Water Treatment Plant Spaces	3 Independent Spaces to Driveway	3
<b>Total Parking Spaces Proposed</b>		<b>84</b>



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### KEY

- INDEPENDENT PARKING SPACE
- VISITOR PARKING SPACE
- COMMUNITY PARKING SPACE
- WATER TREATMENT PLANT SPACE
- WHEELIE BINS SHOWN IN COLLECTION LOCATIONS

---

4 11.10.2018 PARKING PLAN TO PLOTS 2 & 32  
 REV DATE DESCRIPTION

QUALITY APPROVED  
 DESIGN REVIEWED

TITLE  
**PARKING PLAN (1)**

PROJECT  
 LAND TO SOUTH BILDSTON ROAD, OFFTON, SUFFOLK, IP8 4RR

SURVEY  
 MR PHILLIPS

SCALE DATE DWG NO. REV  
 1:200 @ A1 DEC18 500/OP/D10/A

# Parking Plan 2

Slide 8

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- KEY**
- INDEPENDENT PARKING SPACE
  - VISITOR PARKING SPACE
  - COMMUNITY PARKING SPACE
  - WATER TREATMENT PLANT SPACE
  - WHEELIE BINS SHOWN IN COLLECTION LOCATIONS

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REV	DATE	DESCRIPTION

QUALITY APPROVED DESIGN REVIEW

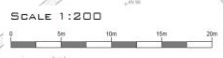
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PARKING PLAN (2)

**PROJECT**  
LAND TO SOUTH BILDESTON ROAD, OFFTON, SUFFOLK, IP8 4RR

**CLIENT**  
MR PHILLIPS



SCALE	DATE	DRAWN BY	REV
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**PARKING PLAN**  
- 1:200

# Site plan with roof plans

Page 103



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- KEY**
- EXISTING TREE / LANDSCAPING RETAINED
  - EXISTING TREE / LANDSCAPING RETAINED
  - PROPOSED NEW LANDSCAPE BUFFERS
  - PROPOSED NEW TREE
  - PROPOSED NEW NATIVE HEDGEROWS
  - SHARED ACCESS & PRIVATE DRIVEWAY IN PERMEABLE BLOCK PAVING
  - SURFACING IN PERMEABLE HARDSTANDING
  - FOOTPATHS IN PERMEABLE PAVING
  - FOOTPATHS IN PERMEABLE HARDSTANDING
  - GRASS / LAWN AREA
  - VISITOR PARKING SPACES

A 01/10/2018 PROPOSED SITES TO PUBLIC & BE FOLLOWING APPROVALS COMPLETED  
 REV DATE DESCRIPTION  
 QUALITY APPROVED  
 DESIGN WORKS  
 TITLE  
**PROPOSED SITE LAYOUT PLAN - ROOFS**  
 PROJECT  
 LAND TO SOUTH BILDESTON ROAD, OFFTON, SUFFOLK, IP8 4RR  
 CLIENT  
 MR PHILLIPS



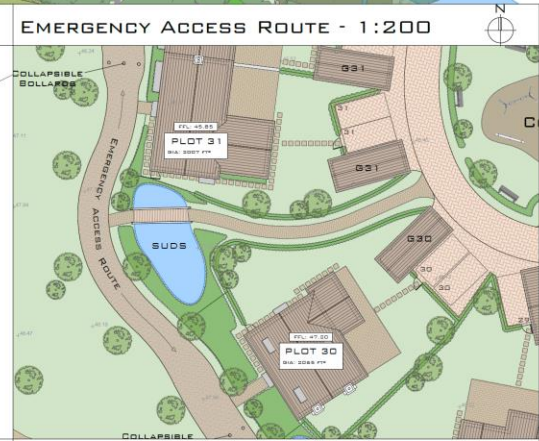
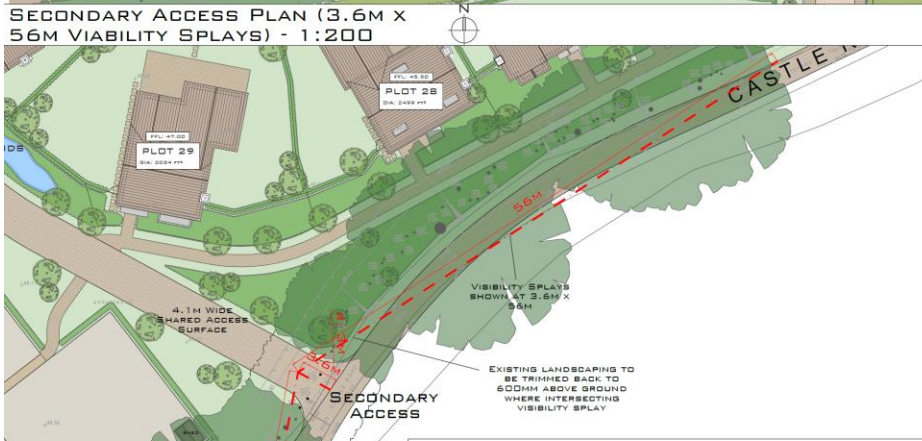
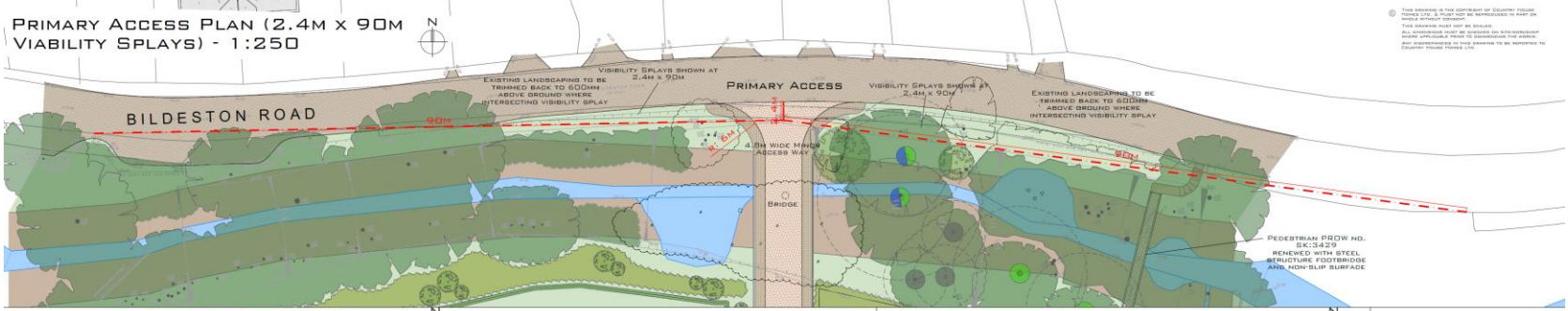
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**PROPOSED SITE LAYOUT PLAN - 1:500**



52.1m

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# Access Plan



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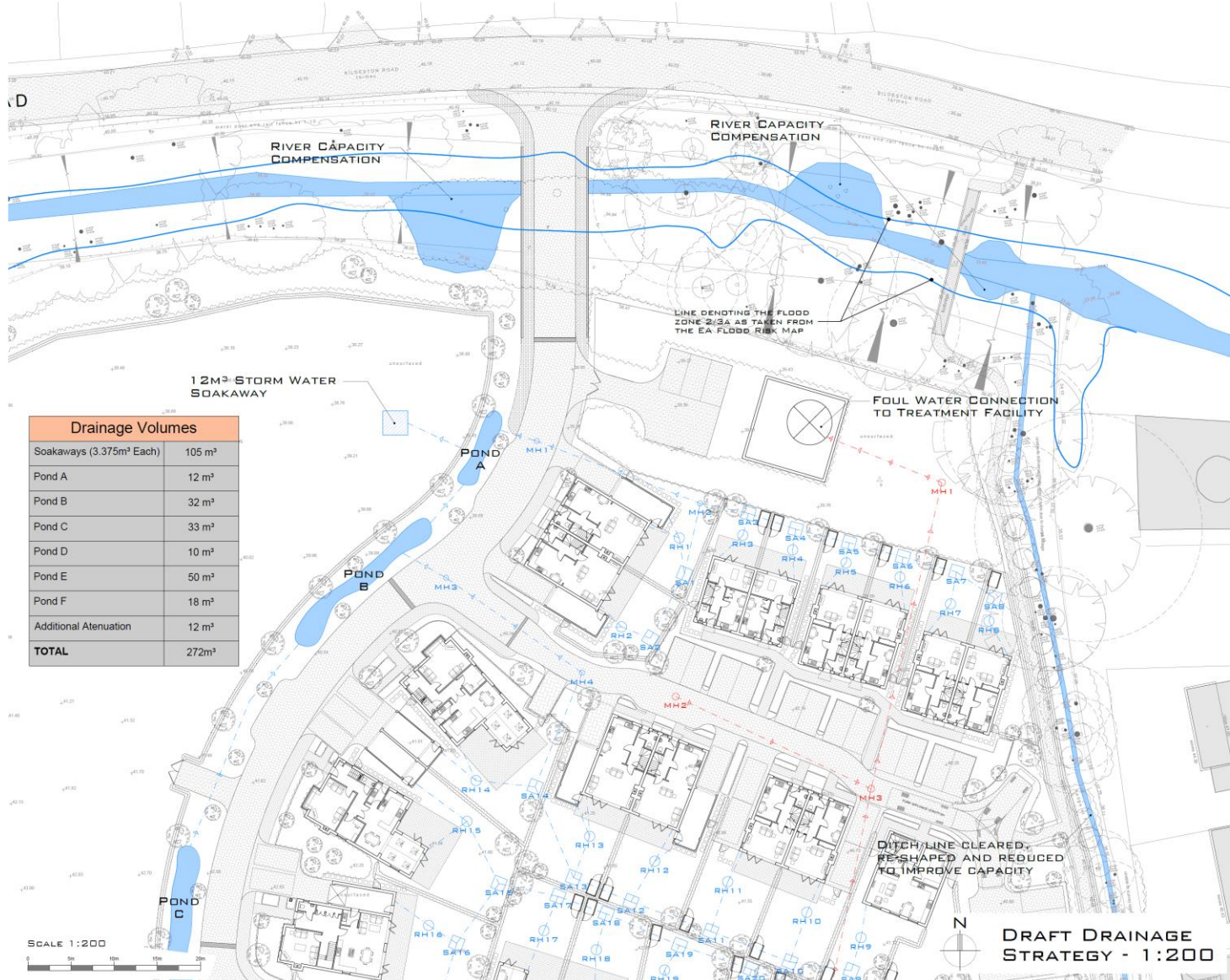
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CLIENT: MR PHILLIPS

SCALE: DATE: DWG NO: REV:

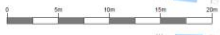
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Drainage Volumes	
Soakaways (3.375m <sup>2</sup> Each)	105 m <sup>3</sup>
Pond A	12 m <sup>3</sup>
Pond B	32 m <sup>3</sup>
Pond C	33 m <sup>3</sup>
Pond D	10 m <sup>3</sup>
Pond E	50 m <sup>3</sup>
Pond F	18 m <sup>3</sup>
Additional Attenuation	12 m <sup>3</sup>
<b>TOTAL</b>	<b>272m<sup>3</sup></b>

SCALE 1:200



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- KEY**
- SOAKAWAYS (3.375M<sup>2</sup> EACH)
  - RAINWATER HARVESTING STATION
  - SURFACE WATER MANHOLE
  - UNDERGROUND SURFACE WATER PIPES
  - FOUL WATER MANHOLE
  - UNDERGROUND FOUL WATER PIPES
  - 12M<sup>3</sup> STORM WATER SOAKAWAY

A 25.01.2019 AMENDMENTS FOR PERMITS  
 REV DATE DESCRIPTION  
 QUALITY APPROVED DESIGN VERIFIED  
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 PROJECT LAND TO SOUTH BILDSTON ROAD, OXFORD, SUFFOLK, IP8 4RR  
 CLIENT MR PHILLIPS



**DRAFT DRAINAGE STRATEGY - 1:200**

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# Drainage Strategy 2

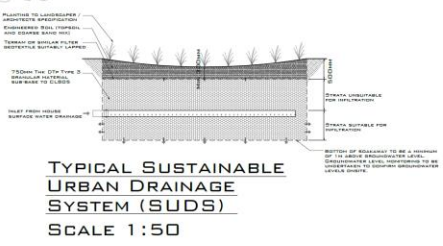
Page 106



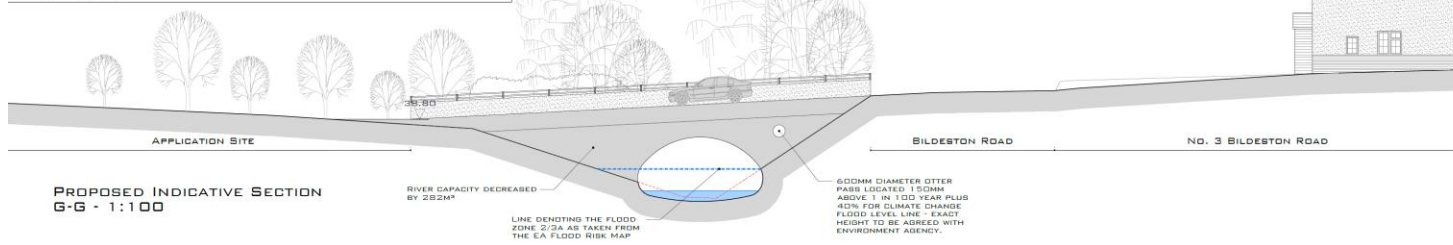
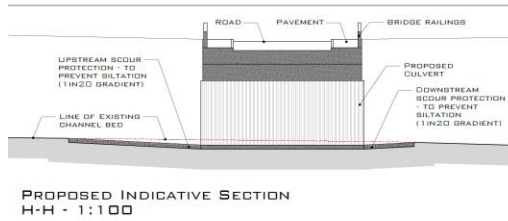
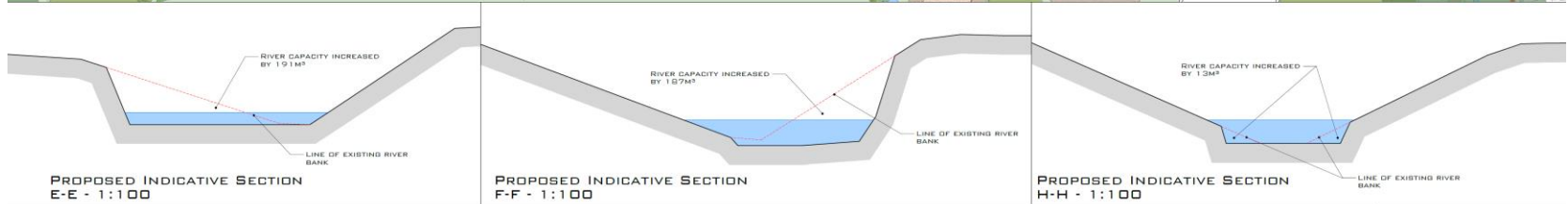
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- KEY**
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  - FOUL WATER MANHOLE
  - UNDERGROUND FOUL WATER PIPES
  - 12m<sup>2</sup> STORM WATER SOAKAWAY

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QUALITY APPROVED ISSUED FOR PER						
TITLE <b>DRAFT DRAINAGE STRATEGY (2)</b>						
PROJECT LAND TO SOUTH BILDESTON ROAD, OFFTON, SUFFOLK, IP8 4RR						
CLIENT MR PHILLIPS						







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REV	DATE	DESCRIPTION
A	20.01.2019	AMENDMENTS FOR IFA

QUALITY APPROVED DESIGN VERIFIED

TITLE  
**PROPOSED BRIDGE & RIVER ENLARGEMENT DETAILS**

PROJECT  
LAND TO SOUTH BILDESTON ROAD, OFFTON, SUFFOLK, IPB 4RR

CLIENT  
MR PHILLIPS

COUNTRY HOUSE HOMES

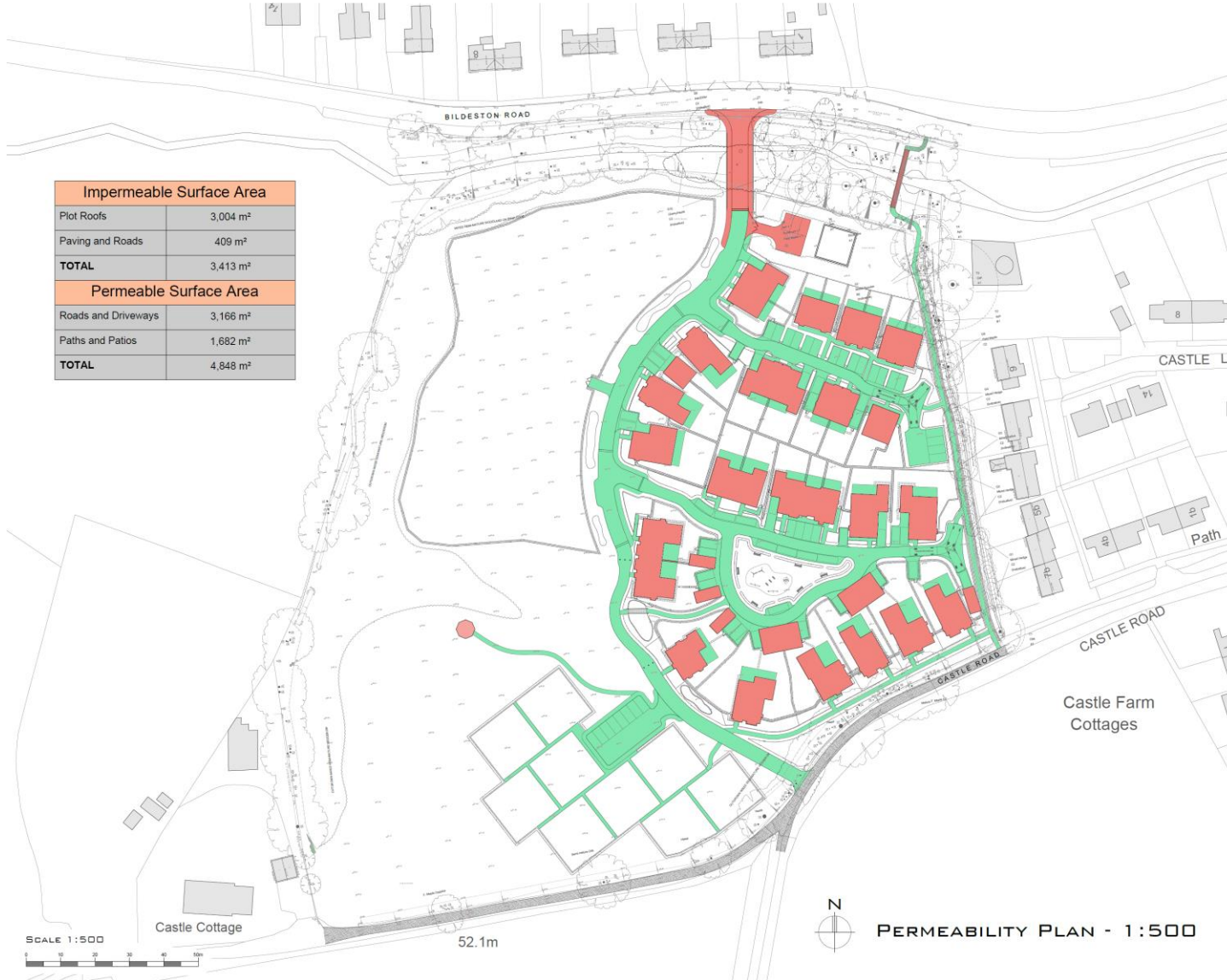


## PROPOSED BRIDGE & RIVER ENLARGEMENT DETAILS

# Permeability Plan

Page 108

Impermeable Surface Area	
Plot Roofs	3,004 m <sup>2</sup>
Paving and Roads	409 m <sup>2</sup>
<b>TOTAL</b>	<b>3,413 m<sup>2</sup></b>
Permeable Surface Area	
Roads and Driveways	3,166 m <sup>2</sup>
Paths and Patios	1,682 m <sup>2</sup>
<b>TOTAL</b>	<b>4,848 m<sup>2</sup></b>



Take account of the amount of permeable surface area to be provided in order to meet the water runoff demand.  
 Take account of the amount of permeable surface area to be provided in order to meet the water runoff demand.  
 Take account of the amount of permeable surface area to be provided in order to meet the water runoff demand.

**KEY**

■ PERMEABLE

■ NON-PERMEABLE

REV	DATE	DESCRIPTION
QUALITY APPROVED DESIGN SUBMITTED		
TOTAL PERMEABILITY PLAN		
PROJECT LAND TO SOUTH BILDESTON ROAD, OFFTON, SUFFOLK, IPB 4RR		
CLIENT MR PHILLIPS		



N  
 PERMEABILITY PLAN - 1:500



Offton & Willisham  
Parish Council  
[www.offtonandwillisham.org.uk](http://www.offtonandwillisham.org.uk)



Miss Teresa Davis  
Parish Clerk  
Offton & Willisham Parish Council  
30 Broadfields Road  
Gislingham  
EYE  
IP23 8HX  
TEL: 07719208444  
Email: [clerk@offtonandwillisham.org.uk](mailto:clerk@offtonandwillisham.org.uk)

Mr Philip Isbell  
Acting Chief Planning Officer  
Growth & Sustainable Planning  
BMSDC  
Endeavour House  
8 Russell Road  
IPSWICH  
IP1 2BX

8<sup>th</sup> January 2018

Dear Philip Isbell

**RE: Application for Outline Planning Permission – DC/18/05313**

I write on behalf of the Offton & Willisham Parish Council and it's residents to provide you with an up-to-date overview of the parish and to also set out below the objections to this Application for Outline Planning Permission.

We have attached a Summary, which outlines the main objections raised by the residents of Offton in a public meeting on 20<sup>th</sup> December 2018.

Following the Parish Council meeting on 3<sup>rd</sup> January, below are the objections of the Council:-

**History of the Site**

This site has been rejected in 1989, under planning reference OL/16/89 and also at the 'call for sites' in 2017. The site is outside of the former settlement boundary and is classified as open countryside. Offton is due to be designated as a hamlet, as the area is incapable of withstanding development.

The Parish previously undertook a Parish Plan in 2008 (published in 2009), which has seen the building of it's own Village Hall to fulfil the community's amenities for the village. There are no outstanding needs for a 'reading room' or 'play area'. The Village Hall (with playground) is a community led enterprise which is a long term plan to meet the needs of it's residents.

**Current Background of Site & Parish**

We can confirm from direct experience of our residents that the nearest school is at full capacity, as is the local Doctors Surgery. There are no public transport links for those who regularly work, with no opportunity to commute on the bus linking to rail networks. Even shopping and leisure pursuits are severely restricted. There are no shops, no schools, no doctors surgeries in Offton.

Bringing attention now to the roads, both council and residents are in agreement when focus is drawn to the roads in and out of the Parish. Residents already find the roads impassable for two vehicles, and distinct worry has been seen regarding the sheer volume of traffic this development would bring in an already overloaded local road network, not to mention the damage to verges during a development. The roads are simply not adequate. Indeed, the 'emergency' access in Castle Lane is a single track road.

The proposed development site has been walked by both councillor, resident and County Councillor who have confirmed inconsistencies with the developer's calculations, for example the bridge calculations differ by 2metres.

Individual residents will experience traumatic changes to their homes and lives. Their privacy will go, the level of noise will increase, a distinct loss of access to views will be seen, and the increase of light during the night could cause serious long term health problems for our residents opposite the proposed site.

We have thriving wildlife in and around the Parish with a large following of residents. Not only are there a varied amount of birds, such as Barn Owls, Little Owls etc, there are Otter, Deer, Water voles and Bats, both of which are extremely sensitive to the area in which they live. They are a testament to the peace and serenity that Offton provide. This peace and serenity will be taken away by a development of this kind in this particular site.

The Parish Council have an Affordable Housing Working Party which met with the developer in relation to affordable housing for the residents of the Parish. At no time did the working party agree to any of the developers assumptions they have made about the Parish Council's view. The Parish Council have taken a very dim view of this treatment by the Developer and the use of an old and now out-of-date Parish Plan, and wish to clearly state this feeling to you. The development is in direct conflict with the Parish's current needs.

#### **Further problems with the Site**

- **Size:** The proposed number of dwellings is too large, a 25% increase for the Parish is unsustainable bordering on catastrophic.

- **Long term Design:** The Sewerage existing in the village is at full capacity already. Residents and Council are concerned about adequate sewerage, lack of adequate access and contamination. The development does not set out to protect the proposed section of the site not outlined for housing and therefore this land could also be developed.

- **No Community Benefit:** There are no community benefits provided which are needed by Offton, The Village Hall has a car park, play park, with grounds and plans for further extension of amenity for the Parish. The allotments are no longer full.

- **Existing Public Footpaths on Open Countryside:** The site has public footpaths, used to access and survey the beautiful open countryside and is enjoyed by residents and further public. This would be destroyed.

- **Wildlife Threatened:** The 'Channel' (term for the small river which will go under the proposed bridge) and the truly green environment that it brings to our thriving and settled wildlife would be decimated.

- **Inadequate Highways:** No adequate road access exists for this site, especially for heavy vehicles. The Village experiences severe 'pinch points', the development would make it more dangerous and provide an increase in carbon emissions directly into the village.

- **Visual Impact:** The development will hugely impact on the existing 'Dark Spot' of the area, and effect a loss of light during the day for those residents nearby.

- **The development is economically unsustainable** (as already mentioned): The development brings no economic benefit and the village has no jobs, schools, regular public transport, shops or medical buildings, with poor & narrow rural local roads giving an overall zero supportive infrastructure for development.

- **Flooding will only increase:** The proposed site is in a flood zone, it already floods and is waterlogged during the winter. The River regularly bursts it's banks. The Village already gets cut off with impassable water on the road, this is set to worsen over time.

- **Green site of open countryside:** The development would cause long term damage, loss to more than just the residents, it would be loss of wildlife which has taken time to develop, the loss of local views, used by many as an aid to leisure and sightseeing, the loss of quality of life, the degeneration of air quality. Because of the small nature of the parish the proposed development would have an even greater impact and long term cumulative effect to degenerate the environment once thriving for both resident/public and wildlife alike.

### Summary of Objections

- There is a prior history of refusal on this 'Green' site
- There is no Economic Infrastructure to support the development
- It is in direct conflict with both the Parish Council's and MSDC's future planning
- It negatively impacts on Public Rights of Way and on Public Rights to enjoy Open Countryside
- It ignores the problems of sewerage and flooding and contamination of the village
- It negatively impacts on the Environment & decimates the habitats of existing Wildlife
- It provides no economic or community benefit for the Parish or wider community
- It incorrectly states the Parish Council's support and supposed benefits

Thank you for inviting us to consult on this outline planning application. The Parish and it's residents clearly Object and I hope I have been able to breakdown the complexity of the objections and show the fragile balance the Parish current exists within.

It is our aim to provide you with sufficient 'on the ground' local information, to aid you in your decision making. Should you require further information please do not hesitate to contact me.

Thank you for your time.

Yours sincerely

Teresa Davis

**Clerk to Offton & Willisham Parish Council**

**From:** Rod Caird <somersham.pc@outlook.com>  
**Sent:** 03 January 2019 11:12  
**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** Re: MSDC Planning Consultation Request - DC/18/05313

This application was discussed at a meeting of Somersham Parish Council on January 2, 2019.

Noting that the proposed development is in the neighbouring parish of Offton, Somersham councillors nevertheless felt that a consequence, if it goes ahead, would be increased traffic volumes in Somersham, which already has difficulty in dealing with existing traffic flows. Road design in the village includes hazardous pinch points and increased traffic levels will add to existing problems. In addition, it was felt that construction traffic, during the build phase of the development, will need to be directed to use main roads rather than further congesting single track and minor routes.

Rod Caird  
Clerk, Somersham Parish Council  
26 Church Lane,  
Henley IP6 0RQ  
[somersham.pc@outlook.com](mailto:somersham.pc@outlook.com)

Please read our privacy notice [here](#). It contains important information about how the Parish Council looks after the personal data of everyone we deal with.



Historic England

EAST OF ENGLAND OFFICE

Mr Mark Russell  
Babergh and Mid Suffolk Councils  
Endeavour House  
8 Russell Road  
IPSWICH  
Suffolk  
IP1 2BX

Direct Dial: 01223 582710

Our ref: **W:** P01009231

17 December 2018

Dear Mr Russell

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH,  
SUFFOLK, IP8 4RR  
Application No. DC/18/05313**

Thank you for your letter of 5 December 2018 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

**Will Fletcher**

Inspector of Ancient Monuments

E-mail: [will.fletcher@HistoricEngland.org.uk](mailto:will.fletcher@HistoricEngland.org.uk)



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



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Your ref: DC/18/05313  
Our ref: Offton – land on the south side of  
Bildeston Road 00057307  
Date: 06 December 2018  
Enquiries to: Neil McManus  
Tel: 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mr Mark Russell,  
Growth & Sustainable Planning,  
Mid Suffolk District Council,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
Suffolk,  
IP1 2BX

Dear Mark,

### **Offton: land on the south side of Bildeston Road – developer contributions**

I refer to the proposal: outline planning application (access and layout to be considered) – erection of 32No.dwellings comprising 9 local need homes, 2 affordable homes, 21 open market homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

Ideally, the County Council would like to see a plan-led approach to housing growth in the locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including highway impacts and school provision.

The District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April 2017) – with an initial consideration by the District's planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

This letter sets out the infrastructure requirements which arise, most of which will be covered by CIL apart from site specific mitigation.

Whilst most infrastructure requirements will be covered under Mid Suffolk District Council's Regulation 123 list of the CIL Charging Schedule it is nonetheless the Government's intention that all development must be sustainable as set out in the National Planning Policy Framework (NPPF). On this basis, the County Council sets out below the infrastructure implications with costs, if planning permission is granted and implemented.



The National Planning Policy Framework (NPPF) paragraph 56 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District Councils have a shared approach to calculating infrastructure needs, in the adopted Section 106 Developers Guide to Infrastructure Contributions in Suffolk.

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and Infrastructure.
- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

The emerging Joint Local Plan contains policy proposals that will form an important tool for the day to day determination of planning application in both districts. Infrastructure is one of the key planning issues and the Infrastructure chapter (page 65, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017) states that the Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, and new development must provide for the educational needs of new residents.

The Joint Local Plan proposals include:

- a) All new development should be supported by, and have good access to, all necessary infrastructure. Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development (Page 67, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017).
- b) A draft policy is similarly drafted to address education provision as follows: Development must be supported by provision of infrastructure, services and facilities that are identified to serve the needs arising from new development (Page 67, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017).

Under Strategic policies in paragraph 20 of the NPPF it says “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision (in line with the presumption in favour of sustainable development) for:

- c) community facilities (such as health, education and cultural infrastructure).”

Under Decision-making in paragraph 38 of the NPPF it says “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

In determining applications paragraph 48 of the NPPF says “Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

### **Community Infrastructure Levy**

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and charges CIL on planning permissions granted after 11 April 2016. Regulation 123 requires Mid Suffolk to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Provision of passenger transport
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

The details of the impact on local infrastructure serving the development is set out below and will form the basis of a future CIL bid for funding:

- 1. Education.** The revised NPPF says in paragraph 94, ‘It is important that a sufficient choice of school places is 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 schools through the preparation of plans and decisions on applications; and

- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

Furthermore, the NPPF at paragraph 104 states: 'Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;'

SCC anticipates the following **minimum** pupil yields from a development of 32 dwellings, namely:

- a) Primary school age range, 5-11: 8 pupils. Cost per place is £12,181 (2018/19 costs).
- b) Secondary school age range, 11-16: 6 pupils. Cost per place is £18,355 (2018/19 costs).
- c) Secondary school age range, 16+: 2 pupils. Costs per place is £19,907 (2018/19 costs).

The local catchment schools are Somersham Primary School, Claydon High School, and One.

As there is no safe walking route from the proposed development to Somersham Primary School a developer contribution is required for school transport purposes, which will need to be secured by way of a planning obligation. The estimated cost of providing each pupil with transport is £950 per annum. Therefore, £950 x 8 pupils x 7 years = £53,200.

Based on existing forecasts, SCC will have no surplus places available at the catchment schools. On this basis, at the primary school level a future CIL funding bid of at least £97,448 (2018/19 costs) will be made and at the secondary school level a future CIL funding bid of at least £149,944 (2018/19 costs) will be made.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the

year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

From these development proposals SCC would anticipate up to 5 pre-school children arising, at a cost of £8,333 per place

This proposed development is in the ward of Barking and Somersham, where there is an existing deficit of places. Therefore, a future CIL funding bid of £41,665 (2018/19 costs) will be made for the 5 children arising.

**3. Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.

**4. Transport issues.** Refer to the NPPF 'Section 9 Promoting sustainable transport'.

A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Sam Harvey will coordinate this.

Paragraph 102 of the NPPF says Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Paragraph 104 says that planning policies should provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).

Paragraph 110 says applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Paragraph 111 says that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

A planning obligation or planning conditions will cover site specific matters.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014.

**5. Libraries.** Refer to the NPPF Section 8: 'Promoting healthy and safe communities'.

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £6,912, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of  $(30 \times £3,000) = £90,000$  per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

**6. Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

*- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.*

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.'

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

**9. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.

**10. Superfast broadband.** This should be considered as part of the requirements of the NPPF Section 10 'Supporting high quality communication'. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange-based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

**11. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

**12.** The above information is time-limited for 6 months only from the date of this letter.

Apart from the school transport contribution to be secured by way of a planning obligation, the above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

Yours sincerely,

Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Growth, Highways & Infrastructure Directorate – Strategic Development

cc Carol Barber, Suffolk County Council  
Sam Harvey, Suffolk County Council  
Floods Planning, Suffolk County Council

Mark Russell  
Mid Suffolk District Council  
Planning Department  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2018/123593/01-L01  
**Your ref:** DC/18/05313  
**Date:** 02 January 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)  
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2  
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.  
CREATION OF NEW ACCESSES TO BILDESTON ROAD AND CASTLE ROAD, 9  
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH, SUFFOLK,  
IP8 4RR**

Thank you for your consultation received on 5 December 2018. We have inspected the application as submitted and are raising holding objections on flood risk, ecology and foul drainage grounds.

### **Flood Risk**

Our maps show the application site lies within fluvial Flood Zone 3b (defined as the functional flood plain), 3a,2 &1, the high, medium & low probability zone. The proposal is for 32 dwellings, a public reading room, creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park, which is classified as a 'more' vulnerable' development, as defined in [Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance](#). Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests and be supported by a site specific Flood Risk Assessment (FRA).

We have not seen evidence that you have applied the Sequential and Exception Tests. This is your responsibly and we recommend you consider them before the applicants review their FRA. We would also like to highlight that we would object should plans change to allow any development in the functional floodplain (3b).

The flood risk assessment (FRA) submitted with this application does not comply with the requirements set out in paragraph 160 of the National Planning Policy Framework (NPPF). This states that for areas at risk of flooding, a site-specific flood risk



assessment must be undertaken that demonstrates that the development will be safe for its lifetime. The FRA also does not comply with paragraph 149 of the NPPF, which requires local planning authorities to adopt proactive strategies to adapt to climate change, taking full account of flood risk and coastal change.

We have reviewed the flood risk assessment, referenced Country House Homes Ltd and dated Nov 18, and are not satisfied that it provides you with the information necessary to make an informed decision.

In particular,

- Different climate change allowances have been used to assess future flood risk than those advised in '[Flood risk assessments: climate change allowances](#)', without adequate justification. In this instance, according to our guidance, the allowances that should be assessed are the Higher Central of 35% and the Upper End of 65%.
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for Higher Central of 35% and the Upper End of 65%. Consequently the development proposes inadequate:
  - Flood storage compensation
  - Safe access and egress routes

### **Siting of Dwellings**

Appendix 4.0 of the FRA– Proposed Residential Development Layout, shows all proposed development lies within Flood Zone 1. However the most up to date climate change analysis has not been used, therefore the extents of the flood plain have not accurately been determined.

### **Bridge across the main river – Access/Egress**

When considering the bridge which crosses the main river, the applicant must consider both the 35% and 65% allowances, and if possible design the structure to be safe in the 65% climate change allowance.

- Flood Storage Compensation is required for any loss of floodplain storage due to the construction of the bridge. We note that compensatory storage has been proposed but this must consider the updated climate change allowances.
- It must be determined whether the access/egress is in flood zone 1 following updated climate change flood extents.
- A Flood Evacuation Plan should be prepared.

Further advice relating to the bridge crossing across the main river can be found within the ecology section below.

### **Compensatory Storage**

Built development within the floodplain should be compensated for on a volume-for-volume and level-for-level basis, and this process requires an available area of land on the edge of the floodplain to be viable, which is achievable in this location.

## **Flood Levels**

It is noted that the FRA adds 30% to the 1% (1 in 100) year flood level. This is incorrect. For fluvial flood flows the applicant must consider both the 35% and 65% allowances – see climate change section below

## **Flood Risk Climate Change Guidance for the Applicant**

### Climate Change - Detailed Allowance

Climate change allowances have changed recently. The Planning Practice Guidance provides advice on what is considered to be the [lifetime of the development in the context of flood risk and coastal change](#). Our guidance '[Flood risk assessments: climate change allowances](#)' provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk.

For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Where assessment shows flood risk increases steadily and to shallow depths, it is likely to be more appropriate to choose a flood lower in the range. Where assessment shows flood risk increases sharply due to a 'cliff edge' effect caused by, for example, sudden changes in topography or defences failing or overtopping, it is likely to be more appropriate to choose a flood level higher in the range.

The proposed development is classified as a “More Vulnerable Large-Major” development, and lies within Flood Zone 2/3a. This means the applicant must adopt a “detailed” assessment. A detailed assessment requires the applicant to perform detailed hydraulic modelling, through either re-running Environment Agency hydraulic models (if available) or construction of a new model by the developer. Assuming the lifetime of the development is until 2118, the allowances the applicant must apply are Higher Central (35%) and Upper End (65%).

We do currently have model coverage for this area. If you wish to extract flows/ re-run this model, the model you will require is Gipping 2012. This can be requested from our Customers and Engagement Team on [Enquiries\\_EastAnglia@environment-agency.gov.uk](mailto:Enquiries_EastAnglia@environment-agency.gov.uk).

We recommend that you assess both the 35% and 65% allowances, and if possible design the development to be safe through sequentially siting the dwellings in FZ1 or raised floor levels in the 65% climate change allowance. If this is not possible then robust justification should be provided, and the development should be designed to be safe through raised floor levels in the 35% allowance and the safety and sustainability of the development should be assessed for the 65% and managed through flood resilient/resistant construction measures to the satisfaction of the LPA.

## **Overcoming our Objection**

The applicant can overcome our holding objection by submitting an FRA that covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved,

we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. More detailed advice on overcoming our objection is provided in an appendix to this letter.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

## **Environmental Permit**

The applicant will need a bespoke environmental permit for flood risk activities for the access bridge over the main River Somersham watercourse, locally known as 'The Channel' and should not wait for planning permission to be granted before applying, as the proposals must be achievable under the Environmental Permitting. An enquiry and/or application should be made to [FDCENS@environment-agency.gov.uk](mailto:FDCENS@environment-agency.gov.uk) as soon as possible.

Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

Further flood risk advice can be found in the technical appendix at the end of this letter.

## **Ecology**

### **Otters**

We are raising a holding objection to this application due to the impacts that the proposed culverted entrance to the development across the watercourse could have on otters. Otters are fully protected under the 1981 Wildlife and Countryside Act. This planning application needs to take the species into account which it has failed to do. We have reviewed the Preliminary Ecology Appraisal dated July 2018 which states that otters are unlikely to use this watercourse.

We however have lots of evidence that otters use even small watercourses such as this to explore, forage for food and travel widely. The good roads guide ([Standards for Highways: Design Manual for Roads and Bridges](#)) states that clear span bridges are required where otters are an issue and we strongly support this view having collected otter casualties for many years. Cheaper culvert and bridge options very often cause otter deaths during high flows after heavy rain as otters are forced out of the channel and have to go round poorly designed crossings and on to roads where they become traffic casualties. For further information on how to overcome our objection, please see the overcoming our ecology objections section below.

### **River Channel Geomorphology**

The proposed culverted entrance to the development to simply widen the channel base in places in order to increase capacity is inadequately designed. A wide channel base such as the proposed cross sections will simply silt up during periods of low flow and so (high in this catchment this would be most of the time). There is then no guarantee that the extra capacity would be available for water during flood flows when needed if it is already filled with silt and/or other debris. A carefully designed two stage channel with a cross section which takes account of both high and low flows will be much more sustainable here.

## **Overcoming our ecology objections**

The applicant should use a clear span bridge to reduce the potential for otter fatalities as well as reducing the risk of siltation. A clear span bridge also brings other benefits such as reducing flood risk problems by increasing channel capacity. We ask to be re-consulted upon submission of any new designs.

## **Preliminary Ecological Appraisal**

With regards to the other biodiversity issues raised in the Preliminary Ecological Appraisal (submitted by The Landscape Partnership) we would like to highlight that all the biodiversity mitigation proposed in section 6.2 (habitat enhancement measures) and 6.3 (small scale enhancements) should be carried out if this application is granted now or in the future to ensure that there will not be a net loss of biodiversity in accordance with NPPF paragraph 170.

## **Foul Drainage**

The application states that foul water will be discharged through a package treatment plant. Further information submitted by the applicant on 7 December 2018 stated that there did not appear to be mains foul drainage and that the area relied on treatment plants within Castle Lane.

Our records show that there is a sewer network near the site and two water recycling centres (WRCs) are operated by Anglian water. We are raising a holding objection on these grounds as it is unclear if the development will be connected to the mains or through a private package treatment plant.

It is important to connect to the mains where possible. The assumption is that foul water should enter the existing sewerage network. Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems. Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered. Justification should be provided if this is the case.

If the applicant confirms that they will connect to the mains, the sewerage undertaker should be consulted and the developer should contact Anglian water about treating the foul water at their existing works. We do not have much information on the Anglian Water WRCs as they are small and we don't have any figures on capacity.

## **Overcoming our objection**

To overcome our objection the applicant should confirm if foul drainage will indeed go through the Anglian Water operated mains foul drainage system. The applicant should thoroughly investigate the possibility of connecting to the public foul sewer and provide justification if this is not possible.

Lack of capacity or plans to improve capacity in the sewer is not a valid reason for a development to install a private sewerage system. In such cases the developer should explore how a lack of capacity may be overcome so that their development can be

connected to a public foul sewer. If the applicant needs to discharge foul water through a package treatment plant a permit may be required and general binding rules must be followed. Further information can be found here <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water#rules-for-existing-and-new-treatment-systems>.

We trust this advice is useful.

Yours sincerely

**Mr Liam Robson**  
**Sustainable Places - Planning Advisor**

Direct dial 020 8474 8923

Direct e-mail [Liam.Robson@environment-agency.gov.uk](mailto:Liam.Robson@environment-agency.gov.uk)

cc Country House Development Ltd

## **Technical Appendix**

### **Other Sources of Flooding**

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.



Mark Russell  
Mid Suffolk District Council  
Planning Department  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2018/123593/03-L01  
**Your ref:** DC/18/05313  
**Date:** 14 March 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)  
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2  
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.  
CREATION OF NEW ACCESSES TO BILDESTON ROAD AND CASTLE ROAD, 9  
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH, SUFFOLK,  
IP8 4RR**

Thank you for your re-consultation dated 25 February following the submission of further details on the 25 February 2019. We have reviewed the application as submitted are removing aspects of our flood risk holding objection and maintaining others. Please see the relevant sections below for further information. We are also maintaining our Ecology and Foul Drainage holding objections – further details are provided below.

### **Flood Risk**

We refer to the Flood Risk Assessment (FRA), prepared by CTP Consulting Engineers, referenced A5689 and dated 30 January 2019 as well as the additional information submitted to us on 25 February 2019 which has now been submitted in support of this application. We have reviewed the documentation and are maintaining our holding objection on flood risk overall as the submitted documentation not adequately address all of the issues raised previously. We are however removing the climate change aspect of our holding objection. Further information can be found below.

### **Bridge and River channel alterations**

We are maintaining this aspect of our flood risk holding objection. In terms of the installation of a culvert and alterations to the river channel itself, we still have concerns

regarding the proposals. We are generally opposed to the installation of culverts. Before any works to the river can occur, a permit is required from us for the works (which is required in addition to any planning permission which may be granted). When we receive an application for a permit, we will only approve a culvert if there is no reasonably practicable alternative, or if we think the detrimental effects would be so minor that a more costly alternative would not be justified. Full consideration should be given to application for a clear-span bridge structure. This will be less damaging to the river itself and should result in less, or possibly no compensatory storage requirements.

### **Overcoming our objection**

Modelling will need to be provided to demonstrate that the crossing structure will not increase flood risk, for a range of return periods (including climate change) and to ensure that any compensatory storage is adequate and also does not result in increased flood risk.

Full consideration should be given to a clear span bridge structure. This will be less damaging to the river itself and should result in less, or possibly no compensatory storage requirements.

We ask to be re-consulted following the submission of any further information and we will provide comments within 21 days.

### **Climate change**

We are removing the climate change aspect of our flood risk holding objection following the submission of further information on 25 February 2019. We note that climate change has been calculated by adding 400mm to the flood level, as agreed with us and it is demonstrated through comparison of this new level with the topographical survey for the site that all buildings will be above this flood level. We therefore have no further objection to the location of the proposed houses and confirm that they will all be located within flood zone.

### **Environmental Permit for Flood Risk Activities**

As confirmed in our previous response referenced AE/2018/123593/01 and dated 2 January 2019, the applicant will need a bespoke environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. The Somersham Watercourse, is designated a 'main river'.

Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

### **Ecology**

#### **River Channel Morphology**

We are maintaining this aspect of our Ecology holding objection. The widened bays for extra storage within the channel are not likely to work in practice as they are much wider than the existing natural width of the bottom of the channel and at the same level. As currently designed this watercourse will be ecologically damaged by being over



deepened and over widened. This will cause the widened bays to become filled with silt and material which take up any proposed storage. To be effective the bays would need to be redesigned to slope in a shallow 'v' cross section closer to the original natural one. The flood water will then drain down naturally back to the bottom without excessive siltation occurring.

This is also true of the bridge itself which being wider than the natural channel could become silted up and a management problem. We would be happy to provide specific advice on this. This would fall under our optional planning advice service. If the applicant would like to make use of this service, they should contact us on [planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk) for which we will be able to provide a quote. Alternatively, we suggest that the developer consults an experienced river geomorphologist.

The interference with the channel will impact negatively on the watercourse habitat creating silty over-widened and over-deepened sections and therefore will also not function to store water in a sustainable manner.

### **Otters**

We are pleased to see the positive revisions made to the bridge design including an otter pass. We are however currently maintaining our holding as the current drawing shows the otter pass well off the ground and not easily accessible during high flows. The otter pass will need to be easily accessible for passage. Precise details will need to be agreed before construction. As stated in the Flood Risk section of our report, the optimal solution would be a clear span bridge. This watercourse is quite a flashy catchment and water levels can rise very quickly.

### **Overcoming our objection**

The applicant should provide details of the widened bays referenced above revised to take natural river morphology into account. In terms of the otter part of our objection, we require revised drawings to take into account the deficiencies highlighted above.

### **Foul Drainage**

We are maintaining our foul drainage holding objection raised in our letter referenced AE/2018/123593/01 and dated 2 January 2019. We have no records of Anglian Water WRC discharging poor quality effluent.

### **Overcoming our objection**

The applicant must try every means to connect to mains foul drainage in the area. Not connecting to the existing foul sewer must be justified by the applicant after consultation with Anglian Water. Please refer to the guidance attached titled "How we decide whether a site should connect to public sewer". We expect sewerage undertakers to make timely provision to accommodate additional flows from new development within the public sewerage network. Please see page 24 of the attached guidance note for further information.

We trust this advice is useful.

Yours sincerely

**Mr Liam Robson**

**Sustainable Places - Planning Advisor**

Direct dial 020 8474 8923

Direct e-mail [Liam.Robson@environment-agency.gov.uk](mailto:Liam.Robson@environment-agency.gov.uk)

cc Country House Development Ltd

End

Mark Russell  
Mid Suffolk District Council  
Planning Department  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2018/123593/05-L01  
**Your ref:** DC/18/05313  
**Date:** 15 April 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)  
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2  
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.  
CREATION OF NEW ACCESSES TO BILDESTON ROAD AND CASTLE ROAD, 9  
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH, SUFFOLK,  
IP8 4RR**

Thank you for your re-consultation dated 26 March 2019 following the submission of revised plans showing an open span bridge. We are therefore removing our Flood Risk and Ecology holding objections provided that below condition is included should the permission be granted. Further information on Flood Risk and Ecology can also be found below. We are maintaining our Foul Drainage holding objection until we receive further information. It is our understanding that the applicant is currently in talks with Anglian Water and we request that we are re-consulted when this is complete or further information is available.

### **Condition**

The bridge shall be built in accordance with the submitted drawing referenced 500/OP0112/C dated March 2019 showing an open span bridge.

### **Reason for condition**

To ensure flood risk is not increased on or off site and that the watercourse will not be ecologically damaged.

### **Flood Risk**

Thank you for submitting further details in relation to the crossing at the above

site. Drawing 500/OP/012/C, dated March 2019, confirms that a clear span bridge shall be provided in place of the originally proposed culvert.

The bridge will be capable of passing flows during the 1% (1 in 100 year) annual probability flood inclusive of climate change, with a 600mm freeboard to soffit level as minimum. The structures span the watercourse from bank to bank, with no supports entering the river channel itself.

We therefore confirm that we remove our objection on flood risk grounds, and have no further comments to make.

It should be noted that irrespective of any planning permission granted, a bespoke permit will be required from us for the construction of the bridge. The permit will cover the bridge details the method of installation and the future maintenance of the structure. For further details, please refer to the following advice:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits#bespoke-permits>

### **Ecology**

This new proposal for a clear span bridge (and removal of proposed culvert and other channel works). This revised proposal overcomes our previous biodiversity and morphology objections.

We trust this advice is useful.

Yours sincerely

**Mr Liam Robson**  
**Sustainable Places - Planning Advisor**

Direct dial 020 8474 8923

Direct e-mail [Liam.Robson@environment-agency.gov.uk](mailto:Liam.Robson@environment-agency.gov.uk)

Mark Russell  
Mid Suffolk District Council  
Planning Department  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2018/123593/06-L01  
**Your ref:** DC/18/05313  
**Date:** 24 April 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)  
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2  
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.  
CREATION OF NEW ACCESSSES TO BILDESTON ROAD AND CASTLE ROAD, 9  
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD OFFTON IPSWICH SUFFOLK  
IP8 4RR**

Following the submission of further information to us on 23 April 2019 we are removing our Foul Drainage holding objection raised in our letter referenced AE/2018/123593/01 and dated 2 January 2019 providing the condition below on foul drainage is included should the permission be granted. We therefore have no objections to this application provided this condition on foul drainage and the condition on bridge construction raised in our letter referenced AE/2018/123593/05 and dated 15 April 2019 is included should the permission be granted.

### **Foul Drainage**

Anglian Waters pre-planning assessment report referenced 145822/904124355/1/0055597 and dated 23 April 2019 has been submitted to us in support of this application. The report confirms Anglian Waters acceptance to receiving foul water from this site through their existing Offton-Middlewood Cottages Water Recycling Centre.

### **Condition**

The development shall connect to the Anglian Water mains sewerage network as indicated in Anglian Waters pre-planning assessment report referenced

145822/904124355/1/0055597 and dated 23 April 2019.

## **Reason**

Planning practice guidance on non-mains drainage states that the first presumption must be to provide a system of foul drainage discharging into a public sewer (ref ID 34-020-20140306).

Paragraph 170 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

We trust this advice is useful.

Yours sincerely

**Mr Liam Robson**  
**Sustainable Places - Planning Advisor**


Direct dial 020 8474 8923

Direct e-mail [Liam.Robson@environment-agency.gov.uk](mailto:Liam.Robson@environment-agency.gov.uk)

cc Country House Development Ltd

End

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/05313	
<b>2</b>	<b>Date of Response</b>	24/12/2018	
<b>3</b>	<b>Responding Officer</b>	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle to manoeuvre around attached are the vehicle specifications.</p>  <p>OLYMPUS - 8x4MS Wide - Euro 6 - Smo</p> <p>Wheeled bin presentation points are required to be plotted on a map for approval.</p> <p>Please provide the safe working load (SWL) for the access over the bridge on the primary access from the north (Bildeston Road).</p> <p>Suggest signage for the emergency route only no HGV access.</p>	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

7	<b>Recommended conditions</b>	Meet the conditions in the discussion.
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Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.



**From:** Highways PROW Planning <PROWplanning@suffolkhighways.org>  
**Sent:** 13 December 2018 16:28  
**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** RE: MSDC Planning Consultation Request - DC/18/05313

**For The Attention of: Mark Russell**

## **Public Rights of Way Response**

Thank you for your consultation concerning the above application.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Public Footpath 26 is recorded through the proposed development area.

Whilst we do not have **any objections** to this proposal, the following informative notes apply.

### **Informative Notes**

The granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

**To apply to carry out work on the Public Right of Way or seek a temporary closure**, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way/> or telephone 0345 606 6071.

**To apply for structures, such as gates, on a Public Rights of Way**, visit <http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.
2. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.

3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

4. If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.
5. The applicant must have private rights to take motorised vehicles over the Public Right of Way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a Public Right of Way other than a byway. We do not keep records of private rights and suggest a solicitor is contacted.
  - **Public footpath** – only to be used by people **on foot**, or using a mobility vehicle.
  - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
  - **Restricted byway** – has similar status to a bridleway, but can also be used by a ‘non-motorised vehicle’, for example a **horse and carriage**.
  - **Byway open to all traffic (BOAT)** – can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle. In some cases, there may be a Traffic Regulation Order prohibiting forms of use.
6. Public Rights of Way & Access is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage it is required to remedy.
7. There may be other public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

More information about Public Rights of Way can be found at [www.suffolkpublicrightsofway.org.uk](http://www.suffolkpublicrightsofway.org.uk)

**Jennifer Green**

**Rights of Way and Access**

Growth, Highways and Infrastructure, Suffolk County Council  
Suffolk Highways, Phoenix House, Goddard Road, Ipswich, IP1 5NP

**Place Services**  
Essex County Council  
County Hall, Chelmsford  
Essex, CM1 1QH  
T: 0333 013 6840  
[www.placeservices.co.uk](http://www.placeservices.co.uk)  
[@PlaceServices](https://twitter.com/PlaceServices)



**Planning Services**  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

25/03/2019

For the attention of: Mark Russell

**Ref: DC/18/05313 – Land on the South Side of, Bildeston Road, Offton, Ipswich, IP8 4RR**

Thank you for consulting us on the outline planning application (access and layout to be considered) for the erection of 32No. dwellings comprising of 9 local need homes, 2 affordable homes, 21 open market homes and public reading room. As well as the creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park. This letter sets out our consultation response on the landscape and visual impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site.

#### **Review of submitted information**

The site is an arable landscape covering a total area of 3.8 hectares and bounded native hedgerows. It has a water course known as The Channel on the northern edge and abuts existing residential gardens of Castle Way and PROW SK3429 along its east boundary. Generally there are native hedgerows to all boundaries although these hedges are patchy in sections having been impacted by farming activity.

The site lies within a Special Landscape Area (SLA). Saved Policy CL2 of the Mid Suffolk District Local Plan (2007) states that development proposals in Special Landscape Areas will only be permitted where they maintain or enhance the special landscape qualities of the area and ensure they are designed and sited so as to harmonise with the landscape setting. As the Design and Access Statement (DAS) suggests, the proposed landscape scheme equates to 60% of the site. However, the majority of this is managed and 'man-made' landscape features, which will still have an impact on the landscape value and natural quality that will not be reflecting the character of the area or its special landscape setting.

The DAS concludes that "*when assessed in context with the proposed development scheme and community assets one can determine that the proposed development, by virtue of its design, layout, siting and scale will have a minimal impact on the wider landscape in the south, north and easterly directions.*" However, after a desktop study and a site visit we are of the opinion that this is not the case and that there are key receptors and viewpoints that will inevitably be adversely impacted by this proposed development and would deem it unacceptable in this location.

#### **Likely impact on the surrounding landscape**

As stated above, the proposal will inevitably have an adverse impact on the existing rural character of Offton and the surrounding countryside. Offton is classed as a countryside village and the application site lies west of the settlement boundary. The countryside that surrounds Mid Suffolk settlements is attractive and is protected. Policy CS2 of the Mid Suffolk Core Strategy Development Plan document (Adopted Sep 2008) states that 'In the countryside development will be restricted to defined categories in accordance with other core strategy policies such as agriculture and forestry, the preservation of Listed Buildings and rural exception housing' and 'exceptions might be for affordable housing where a local need is identified or small scale employment that can be operationally justified



and where these developments cannot be met in a more sustainable location.' However, the density, character and layout proposed is not suitable for this countryside location and wouldn't be supported due to the impact on landscape character and setting.

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Rolling Valley Farmlands landscape character type (LCT). This is a rich and varied landscape with a concentration of towns and villages. Key characteristics of this LCT include: substantial and long-established hedges of hawthorn, blackthorn and dogwood, greens or commons, gently sloping valleys and contained landscapes. It is important that landscape characteristics such as these are retained and/or enhanced to ensure the countryside village character is not lost. However, due to the density, proposed highway access points and physical location this has not been accomplished.

For the reasons stated above, we would recommend this application is **refused**.

If you have any queries regarding the above matters, please let me know.

Kind regards,

**Ryan Mills** BSc (Hons) MSc CMLI  
**Landscape Consultant**  
Telephone: 03330320591  
Email: [ryan.mills@essex.gov.uk](mailto:ryan.mills@essex.gov.uk)

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils.**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**Sent:** 12 December 2018 14:08

**To:** Mark Russell <[Mark.Russell@babberghmidsuffolk.gov.uk](mailto:Mark.Russell@babberghmidsuffolk.gov.uk)>

**Cc:** BMSDC Planning Area Team Blue <[planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)>

**Subject:** DC/18/05313 Land on the South Side of Bildeston Road, Offton

Hi Mark,

The Heritage Team will not need to comment on this application.

The 'Amended Heritage Statement' includes additional information on proposed archaeological investigations on the site, so the SCC Archaeological Officer may need to be re-consulted instead.

Thanks,  
Karolien

**Karolien Yperman BA(Hons) MA**

Heritage and Design Officer

**Babergh and Mid Suffolk District Councils – Working Together**

T: 01449 724820

T: 07850 883258

E: [karolien.yperman@babberghmidsuffolk.gov.uk](mailto:karolien.yperman@babberghmidsuffolk.gov.uk)

E: [heritage@babberghmidsuffolk.gov.uk](mailto:heritage@babberghmidsuffolk.gov.uk)

[www.babergh.gov.uk](http://www.babergh.gov.uk) & [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

From: Iain Farquharson <iain.farquharson@baberghmidsuffolk.gov.uk>  
Sent: 24 December 2018 13:36  
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
Cc: Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>  
Subject: 252637: MSDC Planning Consultation Request - DC/18/05313

Dear Mr Russell

We have reviewed this application and are pleased to see a high degree of community spaces and some mention of the sustainability of the dwellings themselves, although this could be bolstered.

There is description of sustainability items in sections 18, 19 and 20 of the design and access statement which is welcome.

We would like to see commitments to a reduction in CO2 and or energy, use of sustainable materials and construction techniques (referencing the BRE Green Guide) and commitment to make every dwelling ready for the low cost simple installation of electric vehicle charging points as per NPPF and Suffolk County guidance.

The complete dismissal of renewable technology as 'the locality would be inappropriate' is not a genuine technical or regulatory reasons for its exclusion and should be incorporated into the scheme.

We would be supportive of this application as long as these items are agreed upon as a condition to any permission.

Regards

Iain Farquharson

Senior Environmental Management Officer  
Babergh Mid Suffolk Council

01449 724878 / 07860 827027  
[//iain.farquharson@baberghmidsuffolk.gov.uk](mailto://iain.farquharson@baberghmidsuffolk.gov.uk)

Mark Russell  
Planning Department  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX

29<sup>th</sup> May 2019

Dear Mark,

**RE: DC/18/05313 Outline Planning Application - Erection of 32No. dwellings (9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes) and public reading room. Creation of new accesses, 9 parish allotments and a community car park. Land on The South Side of Bildeston Road, Offton, Ipswich, IP8 4RR**

Thank you for sending us details of this application, we have the following comments:

We have read the Interim Ecological Impact Assessment (The Landscape Partnership, January 2019) and we are broadly satisfied with the findings of the consultant. We note that the dormouse nest tube survey commenced in April 2019 (letter from Landscape Partnership dated 20<sup>th</sup> May 2019) but will not be complete until September 2019 at the earliest. If any permission were to be granted, it would need to be a condition of planning consent that no works are to commence prior to the completion of the dormouse survey, and any subsequent mitigation strategy required has been submitted.

We note that a proportionally large area in the west of the site has been designated as Public open Space and Community Grazing Land. We query how this land will be protected against future development? We also request that a suitable Landscape and Ecological Management Plan is submitted as a condition of planning consent to ensure best maintenance of the land for biodiversity.

The site also appears to lie within the area covered by the emerging Recreation Disturbance Avoidance Mitigation Strategy (RAMS), further consideration must therefore be given to the need for Habitat Regulations Assessment (HRA) of the proposed development under the Conservation of Habitats and Species Regulations 2017 and the requirement for the proposed development to contribute to this strategy.

Notwithstanding the above, we request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jill Crighton  
Conservation Planner

## MID SUFFOLK DISTRICT COUNCIL

To: Mark Russell - Planning Officer  
From: Louise Barker – Housing Enabling Officer – Strategic Housing  
Date: 2<sup>nd</sup> January 2019

SUBJECT: - DC/18/05313 | Outline Planning Application (Access and Layout to be considered) Erection of 32No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

Location: Land on The South Side of Bildeston Road Offton Ipswich Suffolk IP8 4RR

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### Key Points

#### 1. Background Information

This is an outline application for 32 dwellings.
This development is delivered would trigger an affordable housing contribution under Mid Suffolk local policy of 35% = 11 affordable dwellings.

#### 2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%
3	16%
4+	2%



2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

<b>Ref3Estimated proportionate demand for all tenure new housing stock by bedroom number</b>	
<b>Bed Nos</b>	<b>% of total new stock</b>
1	18%
2	29%
3	46%
4+	6%

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households and also for older people who are already in the property-owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa. 730 applicants registered for affordable housing in Mid Suffolk at January 2019. This site if it were to be delivered with a s106 planning obligation In line with current local requirements the affordable housing provided will be to meet district wide need hence the **730** applicants registered is the important number.

### **3. Open Market homes.**

3.1 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and want to remain in their local communities.

3.2 There is a strong need for homes more suited to the over 55 age bracket within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality.

3.3 Furthermore, the **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses.
- Although this is not their first preference, many accept that the private rented sector is their most realistic option.

- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

3.4 The proposed mix on this scheme is to provide for the majority of larger properties mainly 4 and 5 bedroom houses. This current mix is not acceptable and we recommend a larger proportion of smaller homes to meet the needs of first time buyers and those wishing to downsize as above.

#### **4. Affordable Housing**

4.1 This site were it to be delivered with a S106 planning obligation the affordable housing provided will be to meet district wide need; hence the **730** applicants registered is the important number.

4.2 The design and access statement accompanying this application proposes 9 'local needs' homes in perpetuity and with a strong local connection, offering affordable rent and shared equity tenure. It also offers two 'affordable homes' for the wider district. This is not in line with current local allocation policy requirements and a wider conversation has not taken place with Strategic Housing on this point. Only homes provided on a rural exception site will remain in perpetuity. This proposal offers shared equity on some of the homes. Current local policy looks to deliver shared ownership and affordable rent units in the first instance to meet housing need and affordability.

4.4 Both the proposed open market homes mix and the affordable element require amendment and we cannot support the proposed housing mix on this application in its current form. Therefore please note our objection and that we welcome a discussion with both the planning officer and applicant going forward.

Resource Management  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX.

Enquiries to: Abby Antrobus  
Direct Line: 01284 741231  
Email: [abby.antrobus@suffolk.gov.uk](mailto:abby.antrobus@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018\_05313  
Date: 07/12/2018

For the Attention of Jo Hobbs

Dear Mr Isbell

**Planning Application DC/18/05313 – Land on the South Side of Bildeston Road, Offton:  
Archaeology**

This site represents a relatively large area which has not been systematically assessed for archaeological remains. There are hints of Iron Age and Roman activity recorded from findspots in the wider area (County Historic Environment Record OFF 021, OFF 014, OFF 006), and topographically the site lies on a slope over a watercourse. There is potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework 2018* (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the

site investigation

e. Provision to be made for archive deposition of the analysis and records of the site investigation

f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2018).*

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case archaeological evaluation of the site would be required in the first instance. Decisions on the need for further work (excavation, monitoring of contractor's groundworks) would be made on the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Dr Abby Antrobus

Senior Archaeological Officer  
Conservation Team

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: FS/F216245  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)  
Web Address: <http://www.suffolk.gov.uk>

Date: 03/01/2019

Dear Sirs

**Land to the south of Bildeston Road, Offton, Ipswich IP8 4RR**  
**Planning Application No: DC/18/05313**  
**Hydrants are required for this development**  
**(see our required conditions)**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

**Water Supplies**

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

**Sprinklers Advised**

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: [guy@countryhousehomes.co.uk](mailto:guy@countryhousehomes.co.uk)

Enc: Sprinkler information

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: ENG/AK  
Enquiries to: Mrs A Kempen  
Direct Line: 01473 260486  
E-mail: Angela.Kempen@suffolk.gov.uk  
Web Address: www.suffolk.gov.uk

Date: 3 January 2019

**Planning Ref: DC/18/05313**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land to the south of Bildeston Road, Offton, Ipswich IP8 4RR**  
**DESCRIPTION: 32 dwellings**  
**HYDRANTS REQUIRED**

**If the Planning Authority is minded to grant approval, the Fire Authority require adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.**

**If the Fire Authority is not consulted at the planning stage, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.**

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

**Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.**

Continued/

OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

Mrs A Kempen  
Water Officer



Created: September 2015

Enquiries to: Fire Business Support Team  
Tel: 01473 260588  
Email: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)



Dear Sir/Madam

## **Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development**

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

### **Dispelling the Myths of Automatic Fire Sprinklers**

- Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.
- Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.
- An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.
- Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

### **Promoting the Benefits of Automatic Fire Sprinklers**

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.

- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.
- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

### **The Next Step**

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully

Mark Hardingham  
Chief Fire Officer  
Suffolk Fire and Rescue Service

**Planning Policy consultation response 10<sup>th</sup> Dec 2018**

**DC/18/05313 – Outline for 32 dwellings (Offton) (Case officer Mark Russell)**

The emerging JLP is due for a second round of regulation 18 consultation early 2019. Therefore, limited to moderate consideration should be given in decision-making. The emerging JLP document contains a significant amount of evidence and justification work that has been undertaken. Therefore, it is important for the case officer to consider the direction the emerging joint plan is heading in for the purposes of decision-making. The latest NPPF (July 2018) emphasises the importance of a joint up plan-led approach.

The site in question was put forward for consideration through the 'call for sites' (Aug 2017) policy consultation (site ref: SS0160), the site was discounted. Since this time the site has been put forward further, also referenced as SS0160 for the purpose of consistency.

**Offton is currently not designated as a settlement per se in accordance with any current adopted documents; consequently this also shows the rural nature of the area seen as countryside. The existing pattern and form of existing development is minor scattered rural clustered development, which meanders around poor rural road networks that lack services, facilities or quality infrastructure that is capable to accommodate major development. The emerging JLP is in the process of designating Offton as a Hamlet settlement classification, which is an unsustainable classification for major growth.**

**The proposal represents a disproportionate level of major growth within a remote rural location that would continue to create a detached, rural clustered approach. This does not sustainably align with the direction of the emerging JLP or address cumulative social or environmental impacts that would be a consequence of the major proposal in this remote rural location poorly connected to services, facilities or any main settlement.**

**There are known flooding issues in the area and a small part of the site is within flood zone 3. The majority of the site is within a Special Landscape Area - Rolling Valley Farmlands therefore there is landscape impacts to be considered in this remote rural location. Furthermore there is a SSSI site located less than 200m to the north of the site, which all interlinks with the environmental and ecological connections of the site to the wider rural connections.**

**The site is not considered suitable and the planning policy team recommends the application is refused.**

The policy team have not assessed this application from a detailed material consideration perspective (such as fully understanding planning constraints or planning history of the site) only broadly looked at the site from a principle perspective and explained at what stage emerging planning policy documents are at for appropriate consideration and weighting by the case officer in their planning assessment and weighted decision. Therefore, there may be further detailed material issues with this site.

If the policy team can be of any further assistance for advice in this case please don't hesitate to make contact.

Regards,  
Elizabeth Thomas  
Senior Policy Strategy Planner, Planning Policy Team

Sent: 10 December 2018 16:44

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/18/05313

Good Afternoon,

Thank you for this consultation. However, this scheme is for housing and community facilities, therefore Economic development have no comment to make.

Kind Regards

Clare

Economic Development Officer – Open for Business team Babergh and Mid Suffolk District Councils – Working Together

**From:** David Pizzey <[David.Pizzey@babberghmidsuffolk.gov.uk](mailto:David.Pizzey@babberghmidsuffolk.gov.uk)>  
**Sent:** 05 June 2019 10:06  
**To:** Mark Russell <[Mark.Russell@babberghmidsuffolk.gov.uk](mailto:Mark.Russell@babberghmidsuffolk.gov.uk)>  
**Subject:** DC/18/05313 Offton

Hi Mark

I have no objection to this application. The trees proposed for removal are of insufficient value to warrant being a constraint and the protection measures outlined for those scheduled for retention are in accordance with good practice.

Hope this helps.

Regards

David

**David Pizzey** FArborA  
Arboricultural Officer  
Tel: 01449 724555  
[david.pizzey@babberghmidsuffolk.gov.uk](mailto:david.pizzey@babberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)  
Babergh and Mid Suffolk District Councils – Working Together



27 February 2019

Mark Russell  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

Dear Mark,

---

*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** DC/18/05313  
**Location:** Land On The South Side Of Bildeston Road Offton Ipswich Suffolk IP8 4RR  
**Proposal:** Outline Planning Application (Access and Layout to be considered) Erection of 32No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

Thank you for consulting Place Services on the above application.

### **Holding objection due to insufficient ecological information**

#### **Summary**

We have reviewed the Preliminary Ecological Appraisal (The Landscape Partnership Ltd, January 2019) and the Interim Ecological Impact Assessment (The Landscape Partnership Ltd, July 2018), submitted by the applicant, relating to the likely impacts on Designated Sites, Protected species and Priority species/habitats.

We are not satisfied that there is sufficient ecological information has been provided for determination of this application.

This is because the Interim Ecological Impact Assessment indicates that further surveys are required for Hazel Dormice, which will need to be provided prior to determination. Therefore, the LPA does not have certainty of impacts on this European Protected Species and therefore cannot make a lawful decision based on the current data provided.



The Interim Ecological Impact Assessment has also indicated that the proposed development would trigger consultation with Natural England, because the site is situated within the Impact Risk Zone of Middle Wood Offton SSSI and meets the following criteria: *'all planning applications outside or extending beyond existing settlements and urban areas, affecting greenspace, farmland, semi-natural habitats or features such as trees, hedges, streams, and rural buildings or structures, except householder applications'*. Consequently, we recommend that the applicant directly consults Natural England on this matter, as Middle Wood Offton SSSI has not been highlighted within Natural England's initial response (December 2018 – Ref: 267195).

In addition, the site is situated within the 13km Zone of Influence (ZOI) for the Stour and Orwell Estuaries SPA & Ramsar, as highlighted within Natural England's consultation response (December 2018 – Ref: 267195) . Therefore, Natural England's advice should be followed to ensure that impacts are minimised from increased recreation from the new residential development (in combination of other plans and projects) to the coastal Habitats Sites.

The LPA is therefore advised that a financial contribution should be sought towards the emerging Suffolk RAMS, from the residential development within the 13 km ZOI specified. This contribution will need to be agreed in principle prior to determination and secured by a unilateral legal agreement prior to commencement, to allow delivery of offsite mitigation measures prior to occupation. The LPA will also need to prepare a HRA Appropriate Assessment Record to determine any adverse effect on site integrity and secure the offsite mitigation for the the Stour & Orwell Estuaries SPA & Ramsar site.

We advise that the applicant discuss this matter with the Local Planning Authority prior to submission of any details.

This further information is necessary for the LPA to have certainty of impacts for designated sites, Protected and Priority species for this application and to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

We therefore look forward to working with the LPA and the applicant to provide the missing information to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson GradCIEEM BSc (Hons)**

Junior Ecological Consultant

Place Services at Essex County Council

[Hamish.Jackson@essex.gov.uk](mailto:Hamish.Jackson@essex.gov.uk)

**Place Services provide ecological advice on behalf of Mid Suffolk District Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Date: 20 December 2018  
Our ref: 267195  
Your ref: DC/18/05313



Mark Russell  
Mid Suffolk District Council  
[planningblue@babergmidssuffolk.gov.uk](mailto:planningblue@babergmidssuffolk.gov.uk)

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Russell,

**Planning consultation:** Outline Planning Application (Access and Layout to be considered) Erection of 32No.dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

**Location:** Land On The South Side Of, Bildeston Road, Offton, Ipswich Suffolk IP8 4RR.

Thank you for your consultation on the above dated and received by Natural England on 05 December 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

## **SUMMARY OF NATURAL ENGLAND'S ADVICE**

### **FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES**

#### **Habitats Regulations Assessment - Recreational Impacts on European Sites**

This development falls within the 13 km 'zone of influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'). It is anticipated that new housing development in this area is 'likely to have a significant effect', when considered either alone or in combination, upon the interest features of European Sites due to the risk of increased recreational pressure caused by that development.

As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development whilst ensuring that the delivery of the RAMS remains viable. If this does not occur in the interim period then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMS is adequately funded. We therefore advise that you should not grant permission until such time as the implementation of this measure has been secured.

Notwithstanding this, Natural England's advice is that this proposed development, and the application of these measures to avoid or reduce the likely harmful effects from it, may need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment in view of the [European Site's conservation objectives](#) and in accordance with the Conservation of Habitats & Species Regulations 2017.



This is because Natural England notes that the recent [People Over Wind Ruling](#) by the Court of Justice of the European Union concluded that, when interpreting article 6(3) of the Habitats Directive, it is not appropriate when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site. The ruling also concluded that such measures can, however, be considered during an appropriate assessment to determine whether a plan or project will have an adverse effect on the integrity of the European site. Your Authority should have regard to this and may wish to seek its own legal advice to fully understand the implications of this ruling in this context.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of this ruling. In accordance with the Conservation of Habitats & Species Regulations 2017, Natural England must be consulted on any appropriate assessment your Authority may decide to make.

### **Sites of Special Scientific Interest Impact Risk Zones**

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](http://data.gov.uk) website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

Alice Watson  
Consultations Team

## ANNEX A

Natural England offers the following additional advice:

### Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

### Protected Species

Natural England has produced [standing advice](#)<sup>1</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

### Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

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<sup>1</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

**Access and Recreation**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

**Biodiversity duty**

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>  
**Sent:** 24 December 2018 09:14  
**To:** Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** DC/18/05313. Air Quality

Dear Mark

**EP Reference : 252634**  
**DC/18/05313. Air Quality**  
**Land On The South Side Of, Bildeston Road, Offton, IPSWICH, Suffolk, IP8 4RR.**  
**Outline Planning Application (Access and Layout to be considered) Erection of 32No.dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. etc**

Many thanks for your request for comments in relation to the above development from the perspective of air quality. I can confirm that I have nothing to add in relation to air quality at the above development.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
Work: 07769 566988 / 01449 724715  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)



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Dear Mark

**EP Reference : 255613**

**DC/18/05313. Land Contamination**

**Land On The South Side Of, Bildeston Road, Offton, IPSWICH, Suffolk, IP8 4RR.**

**Re-consultation: Outline Planning Application (Access and Layout to be considered) Erection of 32No.dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes . etc**

Many thanks for your request for comments in relation to the above application. Having reviewed the application and supporting Phase I report by AF Howland Associates I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

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**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*

2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

**From:** Chris Ward

**Sent:** 07 December 2018 09:46

**To:** Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/18/05313

Dear Mark,

Thank you for consulting me about the proposed residential development at Land on the South Side of Bildeston Road in Offton. I have no comment to make, as the existing sustainable transport infrastructure is limited for commuting purposes, in addition to the development being too small to justify a Travel Plan in accordance with national planning guidance.

Kind regards

**Chris Ward**

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council



**Planning Application DC/18/05313/OUT**

**SITE: 32 Dwellings at Land on the South side of Bildeston Road, Offton, IP8 4RR**

**Applicant: Mr Steven Phillips Country House Homes Ltd. Maidstone**

**Planning Officer: Mr Mark Russell**

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines.

Dear Mr Russell

Thank you for allowing me to provide an input for the above outline planning application for the proposed development of up to 32 dwellings at land south side of Bildeston Road, Offton.

**On behalf of Suffolk Constabulary I have viewed the available plans regarding this proposed application and would like to register the following comments with regards to Section 17 of the Crime and Disorder Act.**

I realise as this is an outline proposal further details will be forthcoming at the reserved matters stage, **particularly with regard to lighting, however, I have a few concerns.**

**The overall layout of the site is well presented and provides an open access area with reasonable surveillance for the eastern side of the community orchard and community grazing areas and it is good to see that a number of properties are back to back, with no rear alleyways.**

**However, there are concerns which I will go into more detail, with regard to the far eastern footpath, linking the western side of castle lane and in particular the two pedestrian entrance areas along this footpath. As well as the security of vehicles by plots 8,10, and plots 26- 32, which have rear parking and the parking for the allotment area. There are also concerns regarding the security of the allotments, the allotted public reading room and the public community park.**

**The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community. I trust this eastern footpath that will run south to north of the development will**



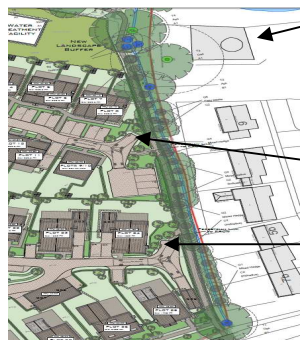
be well lit, especially where they encroach along pedestrian entrances into the plot and by vehicle parking areas?

Further information on the security of footpaths can be found within “SBD New Homes 2016”, (pages 14-17 at Paras 8.1-8.19 refer).

## 1.0 GENERAL COMMENTS ON PROPOSED PLAN

- 1.1 I note that a number of plots have garages and some do not. Police prefer every property to have a garage in order to provide an area for vehicles to be secured.
- 1.2 Police prefer garages to be placed immediately next to properties rather than set back, as set-back garages tend to be before rear gates and have a frontal area where there is a real lack of surveillance allowing an offender to walk into such areas and up to rear gates unseen in order to then break into the rear of a property. I note that this is not the case with in this development. Where garages and car parking spaces are set back, police prefer active windows to be incorporated that look onto such areas to provide surveillance for a house holder and to deter unauthorised movement within such areas. Secure By Design (SBD) New Homes 2016 section 1, at para 16 entitled “Car Parking”, (para 16.1- 16.2 and 16.5-16.7 pages 22-23 refers). Along with section 3 at para 52, also entitled “Car Parking”, (para 52.1-52.2, pages 62-63 refers).
- 1.3 If garages cannot be incorporated and certain plots will rely on open spaced parking, or car ports by the side of the property, it is strongly recommended that at the side of these properties dusk to dawn security lighting is installed to illuminate these areas that conforms to BS5489:2013 standards.

- 1.4 The established right of way that is on the eastern side of the development by the western side of Castle lane that links south and north of the area is a concern as it is on the perimeter of the development by trees, hedging and the rear of properties on Castle Lane. I know any lighting plan will be forthcoming within the designs for this development, but it is strongly recommended that good LED evenly spaced column lighting is implemented along the whole of this eastern area path, especially at critical points where locals and possible offenders could be, such as the two footpath openings from Castle lane; the parking area by plots 8 and 10; around plots 24-25 and the footpath entrance area on Castle Road. The envisaged make up of this eastern perimeter area could lead to further man made pathway short cuts, especially from the area of the sewage treatment area at the far north end of Castle Lane.



- 1.5 I don't know how popular these two access points, or any other unauthorised trodden down man made routes could be? However, if this area is not well lit with the vegetation regularly maintained and cut back, it could become a flash point area where offenders could hide and wait for an unknown pedestrian or cyclist. In the winter months during the darker days this area again if not well lit could become an area that locals avoid for fear of such possibilities occurring. Users need to feel confident that these areas will be safe to access. Good down lighting can be implemented with back plates that will not provide light pollution to the nearby plots mentioned.

1.6 I do not know the width measurements of the eastern footpath running south to north of the plot, but as it could be a main access point it is advised that the width is in line with the principles of "Secure By Design New Homes 2016." I urge the developers to make the width of all main communal footpaths at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles. Where vegetation is incorporated either side of any footpath, It is recommended that it is low growing and regularly maintained, to prevent hiding places for any would be offender. It is recommended that adequate overhead lighting is installed to BS5480:2013 standards. Note bollard lighting is not compliant with Secure By Design principles and BS5489:2013 standards, as it does not give sufficient light at the right height to aid the reduction of the fear of crime as they do not light people's faces sufficiently. (SBD 2016, pages 14-17 at Paras 8.1-8.19 refers).

1.7 I trust that the northern entrance to the new development by the eastern foot bridge will be well lit too and the vegetation on the southern side of the footbridge regularly maintained, as that too could be an area where an offender could linger and needs to be lit and wide enough in order to provide users with confidence to want to regularly traverse it.



1.8 I hope the developers will reconsider the designs for the parking spaces for plots 9,10 and the two visitor spaces allocated for that area. As in their current format they are in an allocated spot at the rear of these buildings, which provide no surveillance to retain any form of security for vehicles parked there.



1.9 I realise for developments such as this, space is not at a premium, however, the police strongly discourage the siting of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, antisocial behaviour, (including gathering of people) and graffiti, as these areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties.

1.10 Again knowing space is not at a premium it is good to see that plots 26-32 have garages allocated to allow these plot owners to secure their vehicles. However, these plots are at the rear of their respective properties and they have adjoining open parking spaces, which because they are also allocated next to them at the rear of properties, have no surveillance from any active rooms to assist in deterring and identifying any offender. As there is no active surveillance it would be good if these areas too had good evenly spaced LED white lighting in order for anyone to be seen by passers-by or anyone who may be walking round the public community park.

1.11 Research regarding burglaries has shown that around 85% of unlawful entries occur via the rear of a property. I trust that the rear gates for all properties especially those by plots 25-32 will have good locking mechanisms that only residents have access for and all these gates should have retainers fitted to automatically close on entry/exit. (SBD 2016 refers, under "Rear Access Footpaths", pages 21-17 at paras 13.1-13.4).

1.12 It is good to note that the community orchard and community grazing land will be enclosed by fencing on all sides and only one entrance which will be gated. However, it is possible that this land could be used by off road bikers. It is advisable that after hours it's either properly secured, or disabled friendly chicanes/ barriers are erected such as those pictured right.



1.13 I would appreciate confirmation that any SUDs areas that are liable to have the capacity to be reasonably deep should be railed off on both sides, particularly the SUD area that encompasses the foot bridge and other area between plots 29-30.

1.14 I would appreciate more information on how the boundary perimeter on the western side will be secured, particularly in the south western corner by the already established Castle Cottage.

1.15 I would like to obtain more details on the makeup of the reading room and if it will be secured and if there will be any dedicated opening hours? If this building is not properly securable, it could very well be the subject of criminal damage, theft and antisocial behaviour. As this building is near the far western side of the development and away from any form of surveillance from any nearby housing, the building and the area around it could very well become a congregating area that could lead to various forms of offending already mentioned.



1.16 I would like more clarification on how the allotment area will comprise, in particular it is preferable if there is only one way in and out of the location by the car park and that the entrance is secured by some form of lock such as a combination lock, or digital key pad that only authorised personnel would have the details for. At present I cannot tell if there are two entrances one by the western side and one by the parking area, or if the parking area has two entrance/exits. The entrance/exit area on the western side by plot 29 is a concern as it looks like this would be an area with very little surveillance and little if any, lighting.



1.17 As allotments tend to suffer from antisocial behaviour, criminal damage and theft, it would be good to see the perimeter well secured with either good quality weld mesh fencing or more environmentally friendly defensive vegetation such as, Hawthorn, Blackthorn, Pyrocantha, and Berberis etc. (SBD New Homes 2016, page 21, para 10.8.4 refers).

1.18 I realise space is tight for the area and in particular around the planned allotment area, but it would be good to see an area set aside for a secure building, such as an ISO shipping container, for allotment holders to secure away their tools and perhaps to store compost and produce.

### Open Areas

2.0 **Public Open Space:** Such areas should be designed so that they cannot be used as parking areas etc. or an area for motor bikes/peds etc. to ride on. Secure fencing should be considered around the area. A maintenance and management plan should be observed and maintenance vehicle access should be secure.

2.1 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.

2.2 The open spaces must be designed with due regard for natural surveillance, with adequate resources in place to ensure its satisfactory future management.

2.3 That public open areas are not used as unauthorised parking areas, or for motorbikes or mopeds to ride on

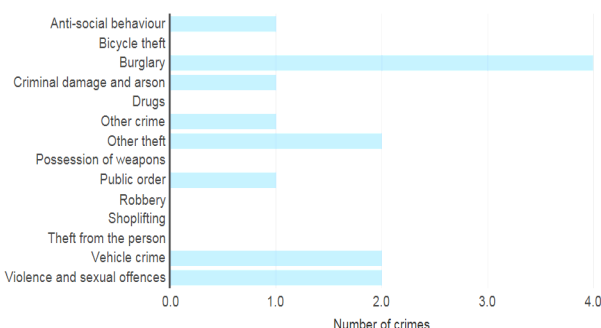
2.4 Any play equipment should be installed to meet BS EN1176 standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to BS EN1177 standards.

- 2.5 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 2.6 Young persons' play areas should ideally be designed to so that they can be secured at night to reduce the threat of damage and graffiti.
- 2.7 All litter bins should be of a fire retardant material.

### 3.0 CRIME STATISTICS FOR CASTLE & BILDESTON ROAD, OFFTON AREA COVERING THE SURROUNDING IP8 4RR POST CODE

3.1 The crime figures have been obtained from the Suffolk Police Crime computer base and the National Police Crime Mapper web site. The Police Crime Mapper Web site is available for any member of the public to view using the following link:

[https://www.police.uk/suffolk/H41A/crime/+Hb8fNX/stats/#crime\\_stats](https://www.police.uk/suffolk/H41A/crime/+Hb8fNX/stats/#crime_stats)



Crime type	Total	Percentage
Anti-social behaviour	1	7.14%
Bicycle theft	0	0.00%
Burglary	4	28.57%
Criminal damage and arson	1	7.14%
Drugs	0	0.00%
Other crime	1	7.14%
Other theft	2	14.29%
Possession of weapons	0	0.00%
Public order	1	7.14%
Robbery	0	0.00%
Shoplifting	0	0.00%
Theft from the person	0	0.00%
Vehicle crime	2	14.29%
Violence and sexual offences	2	14.29%

3.2 The graph left indicates a breakdown of the offences committed around this area between December 2017 to November 2018, totalling 14 offences, the majority 4 burglaries.

### 4.0 REFERRALS

4.1 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.

4.2 The National Planning Policy Framework July 2018 in particular:

a) Chapter 8: Promoting healthy and safe communities; Paragraph 91b; Planning policies and decisions should aim to achieve healthy, inclusive and safe places which 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 clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

b) Chapter 12: Achieving well-designed places; Paragraph 127(f); Planning policies and decisions should ensure that developments 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<sup>46</sup>; **and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.**

**4.3 Further relevant information on security design can be found at:**

**a) The Suffolk Design Guide for Residential Areas- Shape of Development - Design Principles (Security).**

**b) Department for Transport – Manual for Streets (Crime Prevention).**

**4.4 Department for Transport – Manual for Streets (Crime Prevention)**

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police architectural liaison officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

*Safer Places* highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*: also refer to Technical Advice Note (TAN) 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.
- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural

Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

## **5.0 BUILDING RECOMMENDATIONS**

**5.1** It is strongly advised the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.

**5.2** As of the 1<sup>st</sup> June 2016 the police lead Secure By Design (SBD) New Home 2016 replaced the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards [http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured\\_by\\_Design\\_Homes\\_2016\\_V1.pdf](http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf)

**5.3** SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>

**5.4** To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:

- a) All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
- b) All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
- c) Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, **or** STS204 issue 3:2012, **or** LPS1175 issue 7:2010 Security Rating 1, **or** LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

**5.5** **The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.**

## **6.0 FINAL CONCLUSION**

**6.1** It is further strongly recommended the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

**6.2** A further downloadable document can be obtained using the following link: <http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

- 6.3** It would be preferential to see the development, or at least the affordable housing built to Secured by Design SBD New Homes 2016 accreditation. Further information on SBD can be found at [www.securedbydesign.com](http://www.securedbydesign.com)
- 6.4** To reiterate, the main concerns outlined are:
- a) The established right of way on the eastern side by Castle lane that links south and north of the area, as it is on the perimeter of the development by trees, hedging and the rear of properties on Castle Lane. It is strongly recommended good LED lighting is implemented, especially at critical points, such as the two footpath openings from Castle lane, by the parking area by plots 8 and 10, plots 24-25 and the footpath entrance area on Castle Road (page 2, paras 1.4 refers).
  - b) The envisaged make up of this eastern perimeter area could lead to further man made pathway short cuts, especially from the area of the sewage treatment area at the far end of Castle Lane (page 2, paras 1.5 refers).
  - c) Communal footpaths should be at least 3m across to allow people to pass one another without infringing on personal space. Where vegetation is incorporated either side of any footpath, it should be low growing and regularly maintained, to prevent hiding places for offenders (page 3, paras 1.6 refers).
  - d) The pedestrian bridge by northern entrance should be well lit and vegetation on the southern side regularly maintained, to provide users with confidence to want to regularly traverse this area (page 3, paras 1.7 refers).
  - e) Rear car parking by plots 9,10 and the two visitor spaces have no surveillance to retain any form of security for vehicles parked there (page 3, paras 1.8 refers).
  - f) The garages for plots 26-32 are at the rear, with adjoining open parking spaces, there is no surveillance for the area from active rooms. It would be good to see LED white lighting in the area (page 3, paras 1.10 refers).
  - g) The community orchard and community grazing land could have unlawful usage from off road bikers, so it is advisable that it is either locked after hours, or that disabled friendly chicanes/ barriers are erected. (page 3, paras 1.12 refers).
  - h) The SUDs areas encompassing the foot bridge and between plots 29-30 should be railed off on both sides (page 4, paras 1.13 refers).
  - i) How the boundary perimeter on the western side will be secured, particularly in the south western corner by Castle Cottage (page 4, paras 1.14 refers).
  - j) If the reading room will be secured and if there will be any dedicated opening hours, as it could be the subject of criminal damage, theft, congregating and antisocial behaviour (page 4, paras 1.15 refers).
  - k) How the allotment area will comprise, preferably with only one way in and out of the location by the car park and that the entrance is secured by some form of lock such as a combination lock, or digital key pad and only authorised personnel have access (page 4, paras 1.16 refers).
  - l) The entrance/exit area on the western side by plot 29 looks like the area may have poor lighting and a lack of surveillance (page 4, paras 1.16 refers).
  - m) Allotments tend to suffer from antisocial behaviour, criminal damage and theft, it would be good to see the perimeter well secured with either good quality weld mesh fencing or more environmentally friendly defensive vegetation (page 4, paras 1.17 refers).

- n) It would be good to see an area set aside for a secure building, such as an ISO shipping container, for allotment holders to secure away their tools and perhaps to store compost and produce (page 4, paras 1.18 refers).**
- o) That public open areas are not used as unauthorised parking areas, or for motorbikes or mopeds to ride on.**

If the planners wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely

Phil Kemp

Designing Out Crime Officer  
Western and Southern Areas  
Suffolk Constabulary, Raingate Street  
Bury St Edmunds, Suffolk, IP33 2AP



**From:** Jason Skilton <[Jason.Skilton@suffolk.gov.uk](mailto:Jason.Skilton@suffolk.gov.uk)>  
**Sent:** 13 May 2019 07:43  
**To:** Stuart Macmillan <[stuart.macmillan@ctp-llp.com](mailto:stuart.macmillan@ctp-llp.com)>; Guy Osborne <[guy@countryhousehomes.co.uk](mailto:guy@countryhousehomes.co.uk)>  
**Cc:** zach@countryhousehomes.co.uk; Mark Russell <[Mark.Russell@babberghmidsuffolk.gov.uk](mailto:Mark.Russell@babberghmidsuffolk.gov.uk)>  
**Subject:** RE: A5689 - Land On The South Side Of, Bildeston Road, Offton, Ipswich IP8 4RR Ref DC/18/05313

Hi Stuart and Guy

Looking at the second set of results produced by AF Howlands Associates from December 2018, it does appear that an acceptable worst case rate of infiltration achieve would be acceptable.

Its normally required that three trial pits are dug and tested. In this instance I note that only two trail pits have been dug and tested, and of these trial pits only one was in the area proposed to be developed.

However, as you have a second viable method for the disposal of surface water e.g. controlled discharge to a watercourse, as well, I maybe able to condition further testing.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Flood & Water Management  
Growth, Highways & Infrastructure

**Suffolk County Council** | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX  
T: 01473 260411 | <https://www.suffolk.gov.uk/planning-waste-and-environment/flooding-and-drainage/>

**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: Mark Russell

Dear Mark

**TOWN AND COUNTRY PLANNING ACT 1990**

**CONSULTATION RETURN: DC/18/05313**

**PROPOSAL:** Outline Planning Application (Access and Layout to be considered) Erection of 32No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

**LOCATION:** Land on The South Side of Bildeston Rd Offton Ipswich Suffolk IP8 4RR

**ROAD CLASS:**

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

**COMMENTS**

We have reviewed the data supplied with this application, the summary of our findings are as follows:

- The proposed visibility splays for the accesses are sufficient for this application.
- The proposal for 32 dwellings would create approximately 19 vehicle movements within the peak hour (1 vehicle every 3 minutes) therefore the additional vehicles from the development will not affect the capacity of the highway network in the area.
- Castle Road is a single lane narrow road with no footways and is a no-through road. The pedestrians from the development will be walking in the road, detrimental to highway safety and contrary to the objectives of the NPPF. The lack of a footway will also encourage a probable increase in unsustainable methods of travel to and from the site by future residents.
- The catchment primary school is 1.8 miles from the site. The closest bus stop are within walking distance but there is not a continuous footway link.
- As there is not adequate footway or verge for pedestrians to step off the highway, it is not considered a sustainable location from a transport policy perspective.

Although this is an outline planning application, we would like to mention we have concerns about parking allocations for this development. The parking layout for Plots 18 and 19 are shown in a layby which is not in line with Suffolk Guidance for Parking 2015. Also, the places for plots 25 to 32 are at the back of the properties and the residents tend to park as close to the entrance of their house as it's 'more convenient'. This will lead to parking on the footways and verges.

Public Footpath 26 is recorded through the proposed development area. Whilst we do not have any objections to this proposal, the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

No aspect of this proposal warrants an objection to be raised by SCC. Therefore, notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the condition shown below:

## CONDITIONS

V 1 - Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 500/DP/004-A and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

ER 1 - Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

ER 2 - Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

AL10 - Condition: Before the development is commenced, details of the access and associated works, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

HGV CONSTRUCTION - Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters: haul routes for construction traffic on the highway network and monitoring and review mechanisms.

- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points and secure cycle storage shall be submitted to and approved in writing by the Local Planning

Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety.

B 2 - Condition: Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

## NOTES

The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

The proposal will require works being carried out to / in an ordinary watercourse / the piping of a ditch. As the proposal requires work affecting an ordinary watercourse, including a ditch, whether temporary or permanent, then consent will be required from Suffolk County Council's Flood and Water Management team before those works can commence. Application forms are available from the SCC website: <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/working-on-a-watercourse/> Applications for consent may take up to 8 weeks to determine and will incur an additional fee.

Yours sincerely,

**Samantha Harvey**  
**Senior Development Management Engineer**  
Growth, Highways and Infrastructure

# Agenda Item 7c

## Committee Report

Item 7C

Reference: DC/19/01310

Case Officer: Gemma Walker

Ward: Mendlesham

Ward Member/s: Cllr Andrew Stringer

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## **RECOMMENDATION – GRANT PLANNING PERMISSION WITH CONDITIONS**

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### **Description of Development**

Outline Planning Application (Includes access, all other matters reserved) - Erection of 20no. dwellings and access (following demolition of existing buildings).

### **Location**

Land Adjacent To The Principal's House, Stoke Road, Thorndon, Eye Suffolk IP23 7JG

**Parish:** Thorndon

**Expiry Date:** 21/06/2019

**Application Type:** OUT - Outline Planning Application

**Development Type:** Major Small Scale - Dwellings

**Applicant:** The Kerrison Trust

**Agent:** Brown & Scarlett Architects

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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The application is referred to committee for the following reason/s:

It is a "Major" application for 15 or more dwellings

### **Details of Previous Committee / Resolutions and any member site visit**

None

### **Has a Committee Call In request been received from a Council Member?**

None

### **Details of Pre-Application Advice**

Pre-application advice provided in 2018, confirming the site location within the settlement boundary, such that the proposal is acceptable in principle.

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## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

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## **Summary of Policies**

NPPF - National Planning Policy Framework

CS01 - Settlement Hierarchy

CS03 - Reduce Contributions to Climate Change

CS04 - Adapting to Climate Change

CS05 - Mid Suffolk's Environment

CS06 - Services and Infrastructure

CS07 - Brown Field Target

CS09 – Density and Mix

FC01 - Presumption In Favour Of Sustainable Development

FC01\_1 - Mid Suffolk Approach To Delivering Sustainable Development

GP01 - Design and layout of development

H03 - Housing development in villages

H13 - Design and layout of housing development

H14 - A range of house types to meet different accommodation needs

H15 - Development to reflect local characteristics

H16 - Protecting existing residential amenity

HB13 - Protecting Ancient Monuments

CL02 - Development within special landscape areas

CL08 - Protecting wildlife habitats

T09 - Parking Standards

T10 - Highway Considerations in Development

## **Neighbourhood Plan Status**

This application site is within a Neighbourhood Plan Area for Thorndon.

The Neighbourhood Plan is currently at:-

Stage 1: Designated neighbourhood area, application submitted October 2017

Accordingly, the Neighbourhood Plan has little weight.

## **Consultations and Representations**

During the course of the application Consultation and Representations from third parties have been received. These are summarised below.

### **A: Summary of Consultations**

#### **Thorndon Parish Council**

Thorndon Parish Council Councillors voted unanimously to object to this application.

Thorndon accepts and agrees controlled future development is necessary to maintain a vibrant and living village community, to this end a Neighbourhood Plan is currently being drafted for Thorndon. This activity has been ongoing since late 2016 and is scheduled to be completed with the plan being 'Made' late summer 2019. The plan content and the areas included are directed by the results of a documented Community

Survey held in Autumn 2016. This survey contained several questions on future housing development; the result was a resounding NO to large scale housing developments.

The emerging plan has provision for several properties to be developed in the village, over the plan period. This growth will be gradual giving the location, infrastructure and community time to grow and adapt.

Twenty properties may seem small in comparison to many other developments but to Thorndon it is very large and represents a 6% increase in housing numbers. Since 2011 Thorndon has experienced a significant increase in housing numbers; 58 granted applications resulting in an increase of 21 %. If this scheme is granted approval it will bring the increase to 28%, of which 17% will be at the Kerrison site alone.

If this request is granted there would, on the Kerrison site, be 59 properties when taking into account the 11 which were already on that site before any developments occurred. This, when the two accesses to the site have questionable visibility and open onto a road, at a point where narrow 'S' bends create a serious problem in passing for larger vehicles. This part of the road experienced 28,400 vehicle movements between April 5th and May 3rd in 2018; a surprisingly high number for a road which is only negotiable by the use of passing places. The application also poses potential problems with soft water flows into existing, often overloaded, watercourses. That area of the village invariably experiences surface water drainage problems in periods of high rainfall and the additional roof water resulting from twenty additional properties can only exacerbate this situation.

For a Secondary Village under Policy CS1 of the 1998 Local Plan and as a Hinterland Village under the emerging new Joint Local Plan an increase of 21% in the number of properties over a period of 8 years is very significant. It certainly raises questions around the volume of applications which were granted against certain facets of policy H3 of the 1998 plan.

The scheme also results in the loss of 3 important local services as the premises they utilise are to be demolished, these are Home-Start Mid & West Suffolk Family Support Group, Suffolk Axis Group – an organisation catering for the needs of disabled young persons and Jungle Cubs & Jungle Giants Day Nursery School, the only nursery facility in the village.

During the same period since 2011 the Thorndon CEVC Primary School has seen no real appreciable additional space providing increased pupil capacity, also the nearby primary school at Stoke Ash was closed in 2014 adding extra demand to Thorndon.

Whilst twenty houses provides a small addition to the number of houses required to be delivered by Mid Suffolk District Council and an income from New House Premium, it also rides rough shod over the expressed wishes of the Thorndon Community as can be demonstrated by the results of the 2016 survey. It will also have a potentially very negative and dangerous impact on the east end of Thorndon created by the additional traffic movements.

### **Anglian Water**

No assets owned by Anglian Water within the development boundary.

The foul drainage will have available capacity for these flows.

### **SCC Flood and Water Management**

Approved subject to conditions.

### **SCC Highways**

No objection subject to conditions:

Provision of carriageways and footways

Bin storage and presentation areas to be agreed

Parking and manoeuvring provided  
Construction management plan

### **SCC Archaeology**

The above proposal lies within a site of archaeological potential, on the edge of the historic Standwell Green or Thorndon Green (THO 021). Medieval and Anglo-Saxon objects are recorded to the Northwest (THO 023). There is particular potential for archaeological remains along the southern site frontage, relating to medieval occupation on the green. Groundworks associated with development have potential to impact on archaeological remains which may survive.

There are no grounds to consider refusal of permission to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 199), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

### **SCC Fire and Rescue**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

### **SCC Strategic Development**

Existing schools currently have a deficit of places, requiring CIL funding. Requirement for funding for school transport for secondary age pupils over five years. Requirement for £14,400 S106 obligation.

### **Arboricultural Officer**

No objection subject to being undertaken in accordance with arboricultural report. Although a number of trees are proposed for removal they are of limited amenity value and/or poor condition and their loss will have negligible impact upon the character of the local area. If you are minded to recommend approval we will require a Tree Protection Plan and Arboricultural Method Statement by way of condition.

### **Environmental Health Land Contamination**

No objection to the proposed development from the perspective of land contamination subject to conditions.

### **Environmental Health Noise and Other Issues**

I can confirm with respect to noise and other environmental health issues that I do not have any adverse comments and no objection to the proposed development.

Noise and dust from the construction phase, however, may be apparent to existing occupiers of neighbouring dwellings. I would, therefore, recommend that any approval is conditioned to include a Construction Management Plan to minimise any adverse impacts from this phase of the development.

### **Environmental Health Sustainability**

Require sustainability and energy strategy by condition.



## **Economic Development**

Whilst we would welcome commercial and employment use at this site should it be proposed, previous employment here would have been related to the community uses that have now ceased. We therefore have no comment to make on this application.

## **Strategic Housing**

At present 7 of the proposed dwellings on the development will be for affordable housing.

### **The proposed affordable housing is:**

- 4 x 1 bedroom units (no sizes, location or persons specified)
- 2 x 2 bedroom units (no sizes, location or persons specified)
- 1 x 3 bedroom unit (no sizes, location or persons specified)

## **Preferred mix for Affordable Housing**

Following on from discussions with the planning agent we have agreed to change the original mix which was:

### **Affordable Rent = 5**

- 3 x 2 bed 4 person houses @ 79sqm
- 2 x 3 bed 5 person houses @ 93sqm

### **Shared Ownership = 2**

- 2 x 3 bed 5 person house @ 93sqm

The new agreed mix is:

### **Affordable Rent = 5**

- 4 x 1 bedroom 2 person flats @ 50sqm
- 1 x 2 bedroom 4 person house @ 79sqm

### **Shared Ownership = 2**

- 1 x 2 bedroom 4 person house @ 79sqm
- 1 x 3 bedroom 5 person house @ 93sqm

The above mix is requested and to be included in the S106 agreement.

## **B: Representations**

Objections:

- Overdevelopment
- Increase in housing not acceptable for Thorndon
- Against wishes of village in neighbourhood plan survey
- Does not conform with village plan
- Lack of infrastructure
- Conflict with local plan
- Reliance on cars, public transport limited
- No footpaths
- Un-safe access

Drainage capacity and sewers  
Impact on trees including protected oaks and walnut tree on site  
Disproportionate and out of character  
Flood risk  
No job opportunities  
Loss of village facilities "Home-Start Mid & West Suffolk Family Support Group", "Suffolk Axis Group" and "Jungle Cubs & Jungle Giants Day Nursery School".

Support:  
Prime site for development  
No extra traffic compared to Kerrison Centre  
Positive impact on local trade

## **PLANNING HISTORY**

<b>REF:</b> 3701/15	Conversion of Kelly House to residential use, Conversion of the Old Chapel to Residential Use, Demolition of workshop adjoining the Old Chapel, Demolition of free-standing workshop building and the erection of 7No new houses.	<b>DECISION:</b> GTD
<b>REF:</b> 0361/94/	Change of use of building from school/administration block to conference centre and offices.	<b>DECISION:</b> GTD
<b>REF:</b> 0237/06	Residential Development with dwellings and garages.	<b>DECISION:</b> GTD

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## **PART THREE – ASSESSMENT OF APPLICATION**

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### **1. The Site and Surroundings**

- 1.1 The application site is situated to the north-west of the village of Thorndon. The village extends from north-west to south-east along The Street, in a predominantly linear form, with extensions southwards along Thwaite Road and High Street.
- 1.2 The site is within the settlement boundary for Thorndon, designated as a secondary village.
- 1.3 The site is an area of land that formed part of the Kerrison's site, including the Principals House of the former school. The main Kerrison's building, originally being a school, subsequently a conference centre, has planning permission for conversion to residential, and is currently in the process of being redeveloped. To the east of the site is a playing field.
- 1.4 The site the subject of this application is accessed by the existing access into the Kerrison's site, situated to the east of the Kerrison building and consisting a variety of buildings/uses. These include Settles House, the former gymnasium and the former Principal's House.

## **2. The Proposal**

- 2.1 The proposal is to re-develop the site, demolishing the existing buildings and erecting 20 dwellings.
- 2.2 The proposal is outline in nature, so the mix is not finalised, however the indicative drawings show a mix of dwellings across the site.
- 2.3 The application site extends to 1.22ha, which with a development of 20 units would equate to just over 16dph.
- 2.4 No details of scale or heights have been provided.

## **3. The Principle Of Development**

- 3.1 Policy CS1 of the Core Strategy identifies a settlement hierarchy as to sequentially direct development. The Policy identifies categories of settlement within the district, with Towns representing the most preferable location for development, followed by the Key Service Centres, Primary then Secondary Villages. The countryside is identified as the areas outside of those categories of settlement referred to above.
- 3.2 The application site is located within the settlement boundary for Thorndon, designated as a secondary village. Local Plan Policy H3 sets out that within settlement boundaries applications for housing development will be considered in relation to the appearance and character of the village, effect on residential amenity and highway safety, the availability of services and facilities and policies for the protection of visually important open spaces and countryside.
- 3.3 Policy H3 goes on to prescribe limitations of additional dwellings in such villages with 10 or more dwellings to be permitted only on sites allocated in the local plan.
- 3.4 Subsequent to this Core Strategy Policy CS1 provides a more up to date policy with regards to new housing development, and states that the majority of new development will be directed to towns and key service centres, with some provision for meeting local housing needs in primary and secondary villages, in particular affordable housing.
- 3.5 Notwithstanding the above given the subsequent issue of the NPPF after the Local Plan and Core Strategy, and indeed its following update, the NPPF nonetheless requires a presumption in favour of sustainable development, such that the principle of the development should be considered in this respect and not turn on the requirements of local plan policy.
- 3.6 Paragraph 8 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:

"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;

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 a well-designed and safe built environment, with accessible services and open spaces

that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy. "

- 3.7 Economic Objective – The application site has been home to several businesses, Jungle Cubs and Jungle Giants in the old gymnasium, Mid Suffolk Home Start, who used the ground floor of the Principle's house and HOPS in Settles House. The loss of these would be considered to have a negative impact with regards to the economic objective, however all of these have already left the site, such that the re-development of the site would not affect these businesses per se. Furthermore, it is noted that Jungle Cubs and Jungle Giants have relocated to Wetheringsett Primary School, Home Start are moving to Eye and HOPS have closed down following an EGM earlier this year. As such the impact on these uses and economically is not considered to be a negative impact of the proposal. Benefits would arise economically from the re-development of the site during construction, albeit that these are transient and limited.
- 3.8 Social Objective - The proposal would support the local community and services and deliver homes including affordable homes, so as to offer some benefits in respect of the social strand of sustainable development.
- 3.9 Environmental Objective –The site is situated within the settlement boundary of Thorndon, as a secondary village. Facilities in Thorndon include The Black Horse public house, which also offers takeaway services, the Community Shop, church and Primary School. The furthest of these facilities is just over 1000m away from the application site, with others closer to the site. There is a bus stop in the centre of the village, adjacent to the public house, which provides access to Ipswich and Eye. There is no footpath between the application site and the centre of the village, although one exists from the centre of the village to the school. In the light of the proximity of services and the services available it is considered that the access to services, even in part without footpath, would still offer sustainable access to local services, such that the future occupants need not be entirely reliant on the private car, supporting the NPPF requirement to move to a low carbon economy.
- 3.10 The proposal makes use of brownfield land to deliver houses, making effective use of land. Furthermore, the proposal includes measures to support biodiversity on the site.
- 3.11 In the light of all of the above the proposal is considered to result in benefits, not outweighed by harm, such that the proposal is considered to be sustainable development, within the requirements of the NPPF.
- 3.12 The concerns raised in respect of the preferences set out in the Neighbourhood Plan consultation are understood, however the application site is situated within the settlement boundary of the current Local Plan 1998 and Core Strategy and continues to be so within the emerging Joint Local Plan, which is a material consideration, but of very little weight until submissions stage. The neighbourhood plan is also at an early stage such that little weight can be attributed to this document.

#### **4. Site Access, Parking And Highway Safety Considerations**

- 4.1 The site access from the highway is the existing access, previously used for the Kerrisons site as a whole, including various residential properties, the conference centre (now re-developed for residential use) and the various prior uses of the application site.

4.2 In the light of this the access to the site is already suitable to provide access for the proposal.

4.3 SCC Highways raise no objection to the proposal, subject to conditions to secure the parking, internal roadways and bin storage areas, as well as a construction management plan.

## **5. Design And Layout**

5.1 The proposal is outline with access the only matter to be considered. Plans have been provided which indicate that the development proposed, of 20 dwellings could be delivered on site.

5.2 The development of this site with 20 dwellings would equate to 16 dwellings per hectare. Core Strategy Policy CS09 expects density of 30dph, in order to make the best use of land, accepting “lower densities may be justified in village to take account of the character and appearance of the built environment.” In the light of this the proposal is not considered to be unacceptable proposing a development of 20 units on this site, given the location within a secondary village and having regards to the character of the area. The appearance, layout, scale and landscaping will be subject to reserved matters.

5.3 Given the scale of existing buildings on the site, the character and appearance of the surroundings and the relationship to the main Kerrison building it is considered that a maximum of two storey dwellings would be appropriate on the site, however this can be adequately controlled by way of condition, and one is proposed accordingly.

## **6. Landscape Impact, Trees, Ecology, Biodiversity And Protected Species**

6.1 The application site currently includes a number of existing buildings, which have been in a variety of uses both recently and previously. The proposal is to demolish these existing buildings and erect 20 residential dwellings.

6.2 In respect of landscape impact the site is currently developed and as such the impact of the proposal in this respect is limited, and can be mitigated by landscaping, to be agreed under reserved matters. The existing boundary hedgerow is shown on the plans and can be enhanced to maintain the boundary between the site and the open space.

6.3 To the south of the site trees are protected by a blanket TPO, however the proposal ensures space is provided for the trees, and an appropriate arboricultural assessment has been undertaken. Our Arboricultural Officer confirms no objection subject to conditions.

6.4 With regards to ecology and biodiversity, appropriate surveys have been submitted with the application which identify no habitats. The site currently includes a selection of relatively modern buildings and hardstanding, such that the development of the site with an appropriate landscaping scheme, secured under reserved matters, and mitigation measures as detailed in the submitted report, will provide benefits in this respect. As such the proposal is not considered to have an unacceptable impact in this regard.

## **7. Land Contamination**

7.1 Environmental Health raise no objection to the proposal, subject to conditions if unexpected ground conditions were to be discovered.

## **8. Heritage Issues**

8.1 The application site is sufficiently remote from heritage assets as to not cause harm to heritage impacts.

## **9. Impact On Residential Amenity**

9.1 The application site is separated from the dwellings on the main Kerrison site by the access road. To the south of the site there are neighbouring properties on Stoke Road. However, sufficient space is available on site to ensure that amenity can be protected, whilst the detailed design considered under reserved matters would secure the layout of the site to protect amenity, and the design of properties with regards to facing windows. With regards to the outline application the proposal is not considered to have an unacceptable impact in this regard.

## **10. Planning Obligations / CIL**

10.1 The application is liable to CIL which would be managed through the standard independent CIL process.

10.2 Planning obligations would be sought for the following:

For the provision of 35% affordable housing and mix

£14,400 for the provision of secondary school transport

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## **PART FOUR – CONCLUSION**

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### **11. Planning Balance and Conclusion**

11.1 The application site is situated within the settlement boundary of a secondary village and is considered to be sustainable development within the requirements of the NPPF. The proposal is not considered to result in adverse impacts or unacceptable harm such that the proposal is considered to be acceptable and accordingly the recommendation is for approval.

### **RECOMMENDATION**

That authority be delegated to the Acting Chief Planning Officer to grant outline planning permission:

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

- Affordable housing

Affordable Rent = 5

4 x 1 bedroom 2 person flats @ 50sqm

1 x 2 bedroom 4 person house @ 79sqm

Shared Ownership = 2

1 x 2 bedroom 4 person house @ 79sqm

1 x 3 bedroom 5 person house @ 93sqm

- £14,400 for the provision of secondary school transport to Hartismere School only, on first occupation.

**(2) That the Acting Chief Planning Officer be authorised to grant Planning Permission upon completion of the legal agreement subject to conditions as summarised below and those as may be deemed necessary by the Acting Chief Planning Officer:**

- Standard time limit
- Reserved matters
- Approved Plans (Plans submitted that form this application)
- Phasing Condition (To allow phasing of the development and allows spreading of payments under CIL)
- Restriction to up to two storey height
- Removal of PD for loft conversions and openings in roof
- Unexpected ground conditions
- Construction management plan including hours of construction and highways requirements
- Archaeological evaluation and reporting
- Fire hydrants and hard standing
- Sustainability and Energy Strategy to be agreed
- Tree Protection Plan and Arboricultural Method Statement
- Surface water drainage scheme to be agreed
- Sustainable drainage components and piped networks submitted
- Provision of carriageways and footways
- Bin storage and presentation areas to be agreed
- Parking and manoeuvring provided
- Provision of ecology measures
- Hedgehog fencing to be installed

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

- Pro active working statement
- SCC Highways notes
- Support for sustainable development principles
- SCC Flood and Water Management Notes

**(4) That in the event of the Planning obligations referred to in Resolution (1) above not being secured within 6 months of the committee resolution that the Acting Chief Planning Officer be authorised to refuse the application on appropriate grounds.**

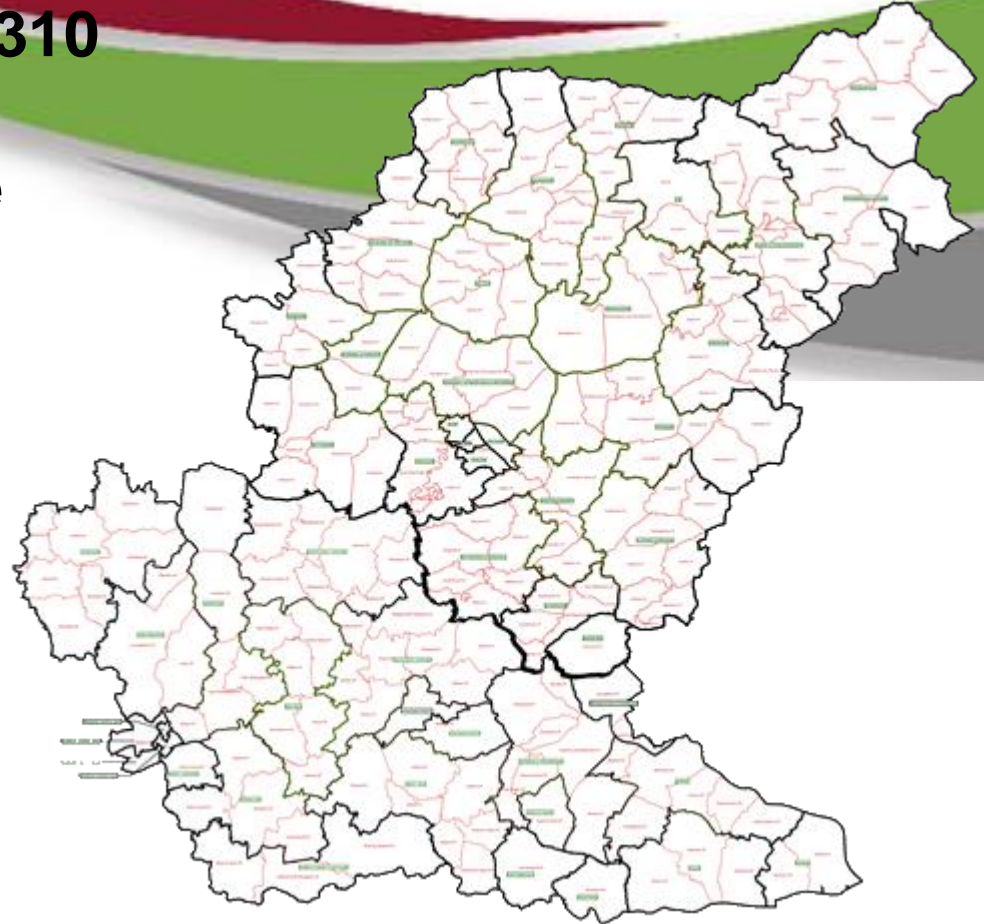
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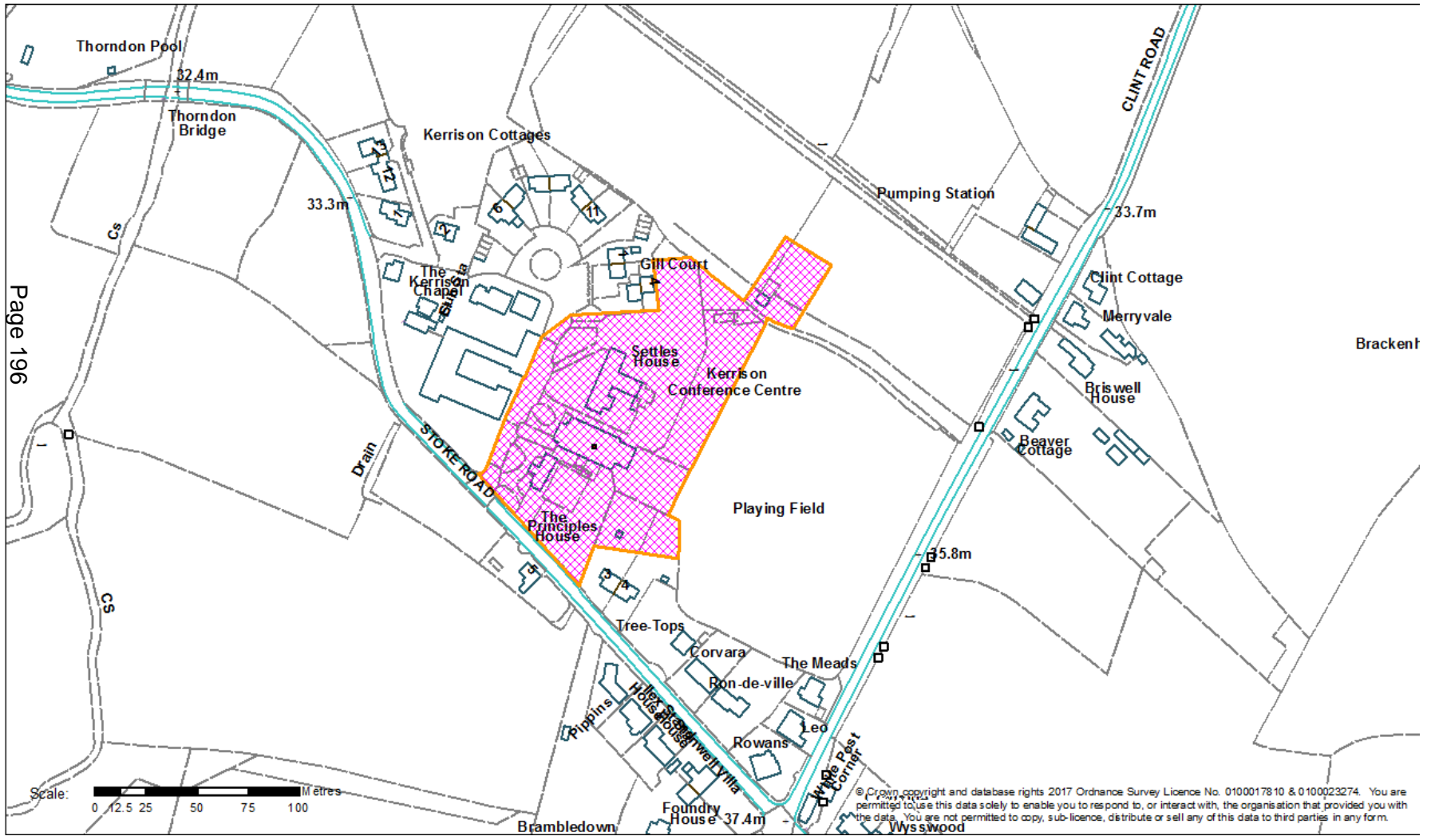


**Application No: DC/19/01310**

**Address: Land Adj To The  
Principal's House  
Stoke Road  
Thorndon**

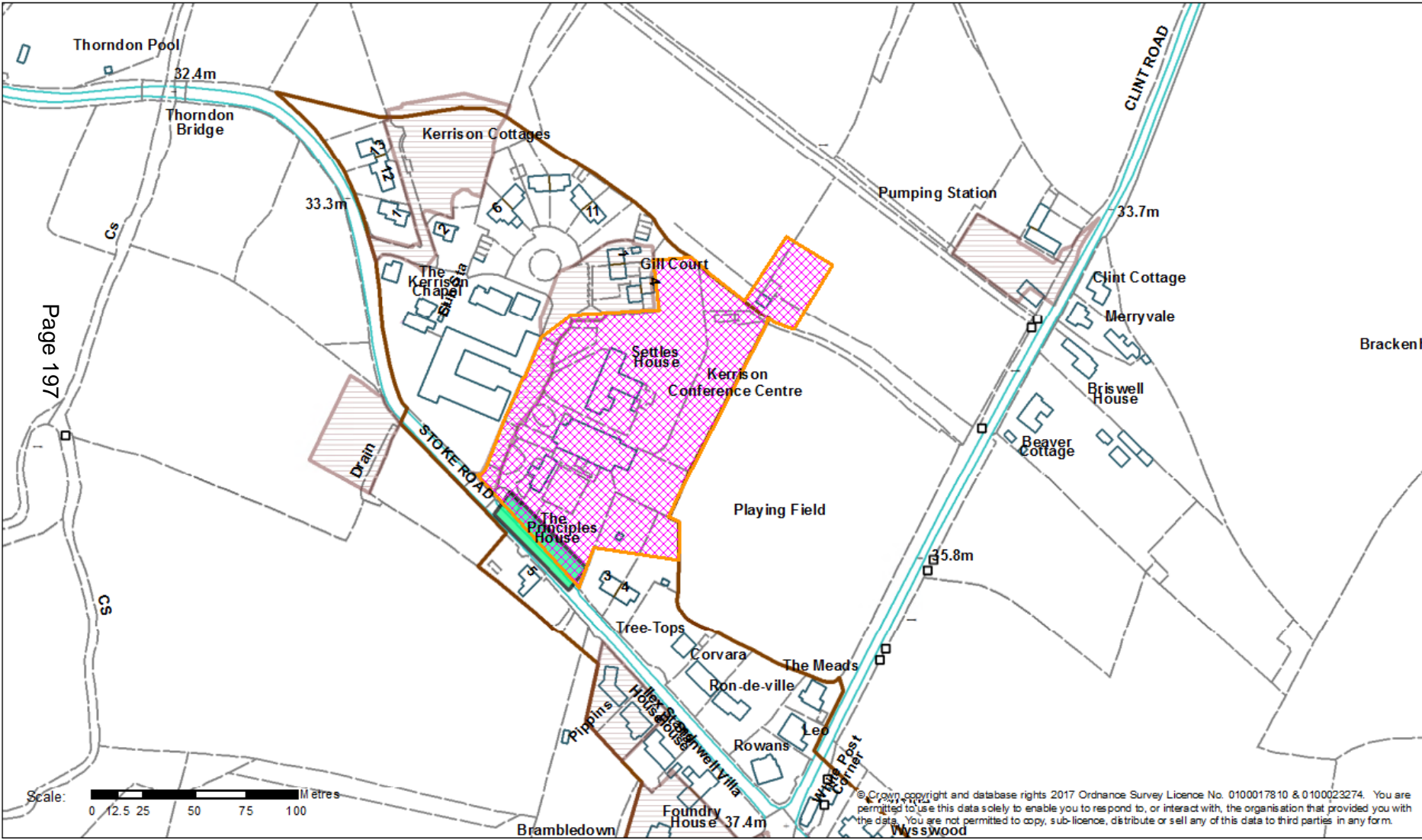
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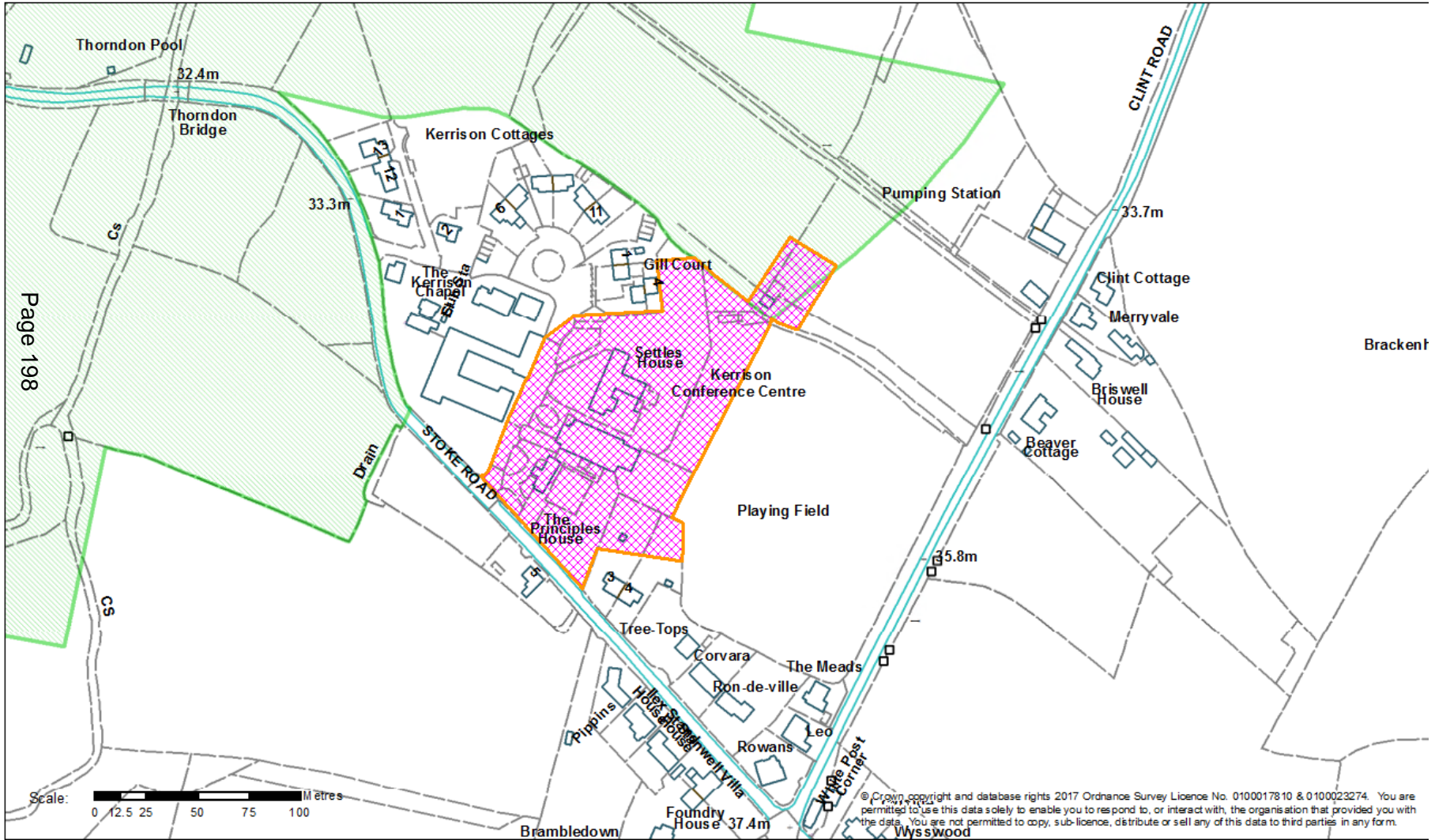


# Constraints Map

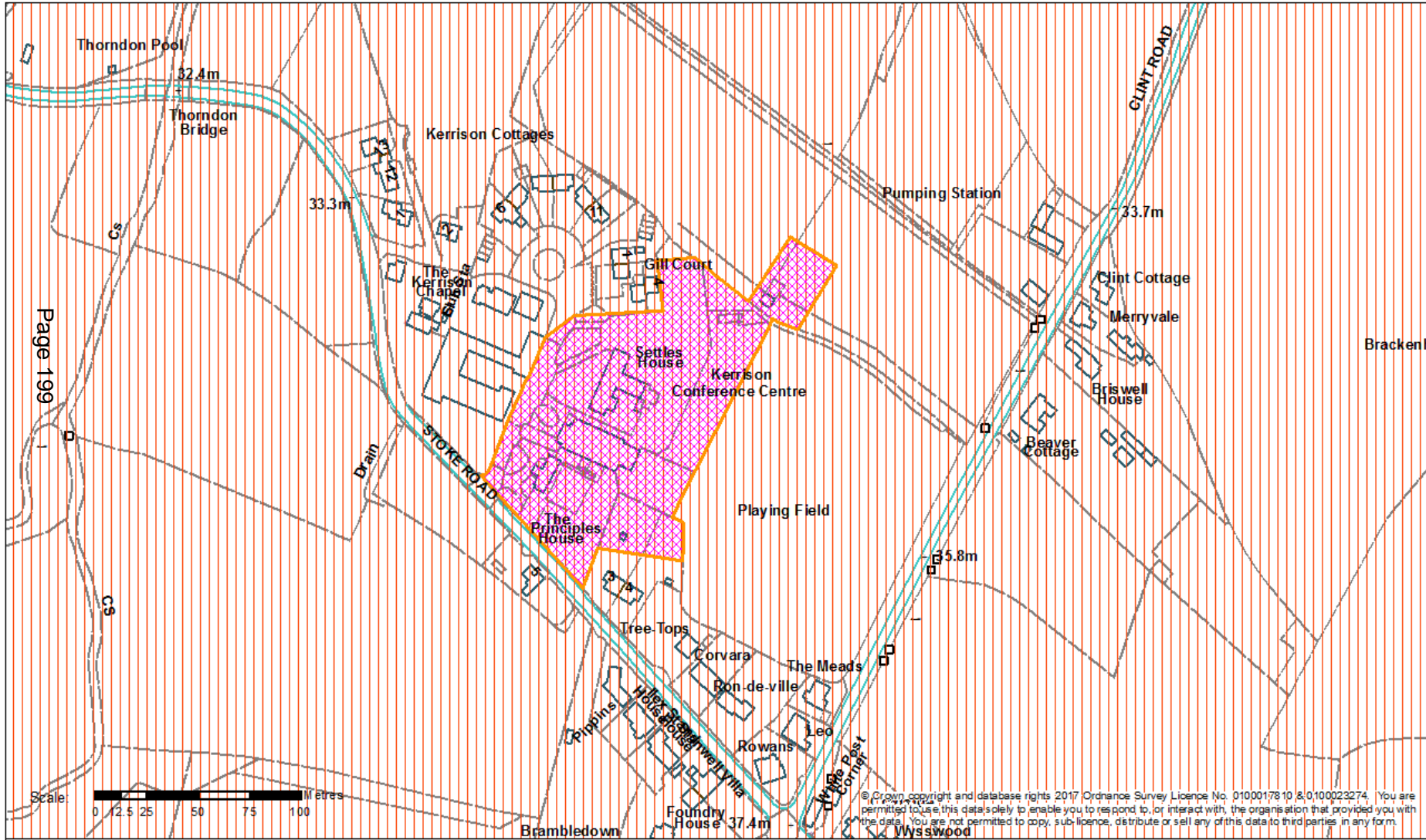
- TPD - Individual TPD/Area of trees/trees
- TPD - Woodland
- Built Up Area Boundaries
- TPD - Group of Trees
- PD Rights Removed

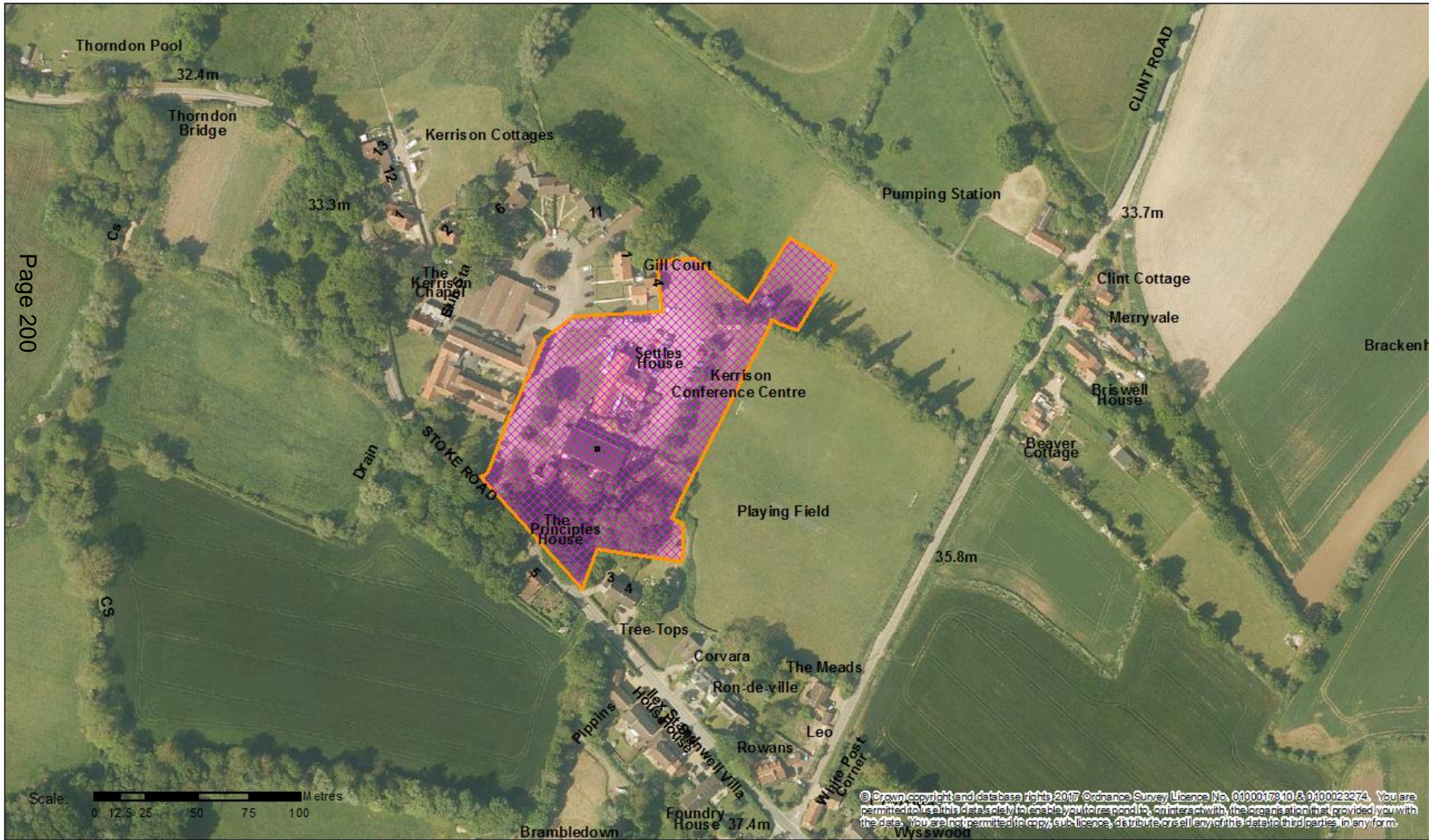


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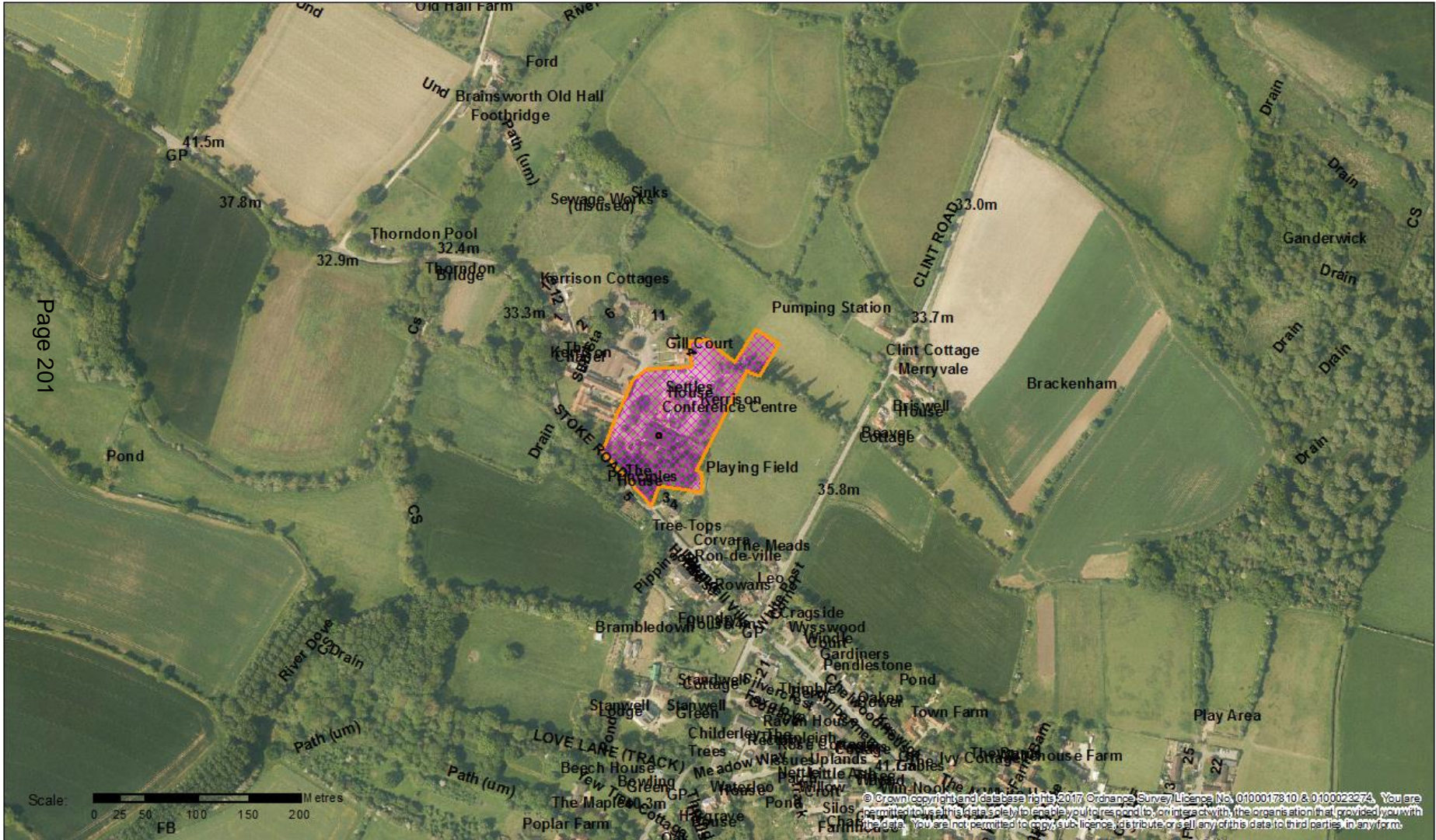


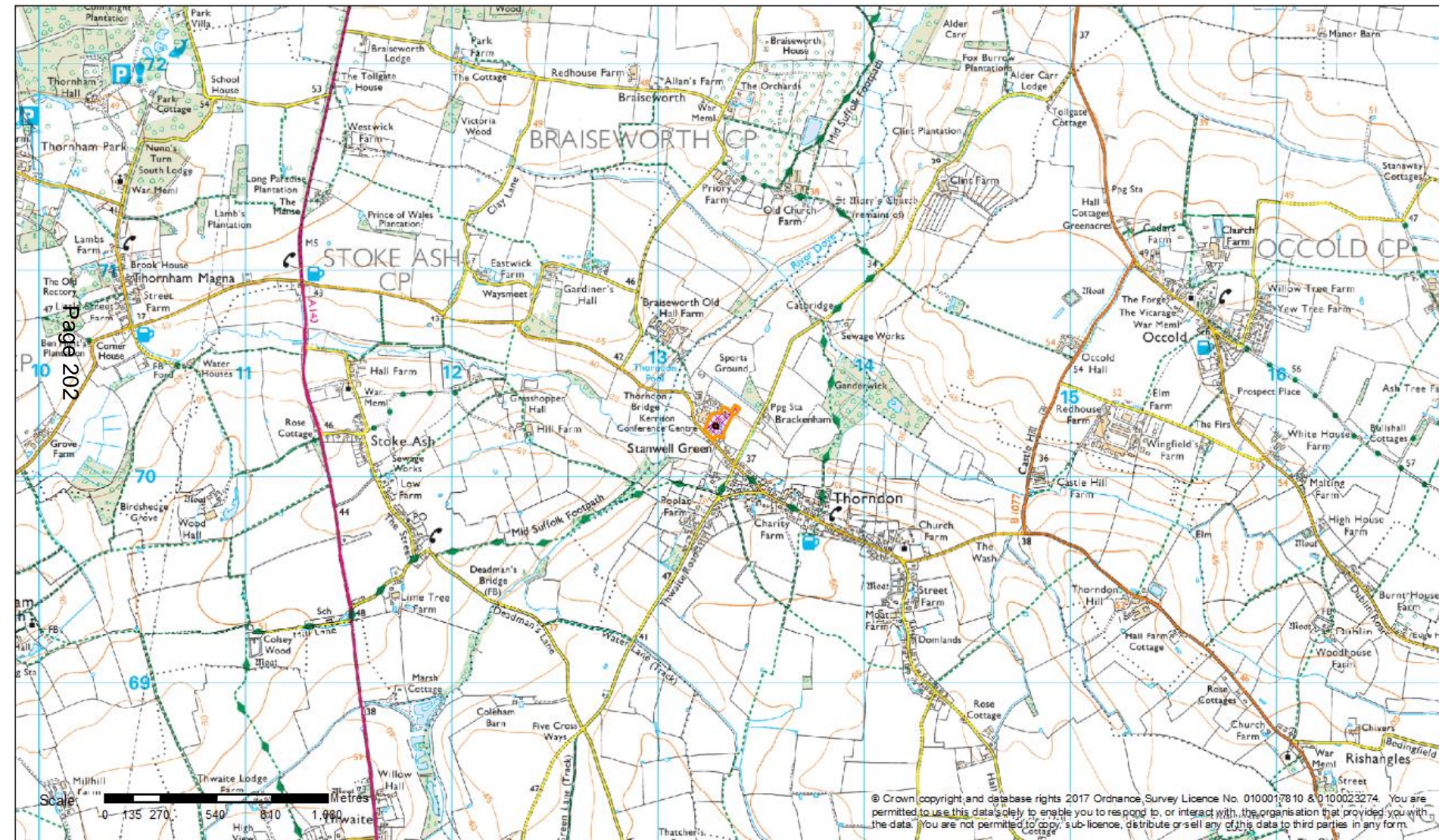
# Constraints Map





# Aerial Map

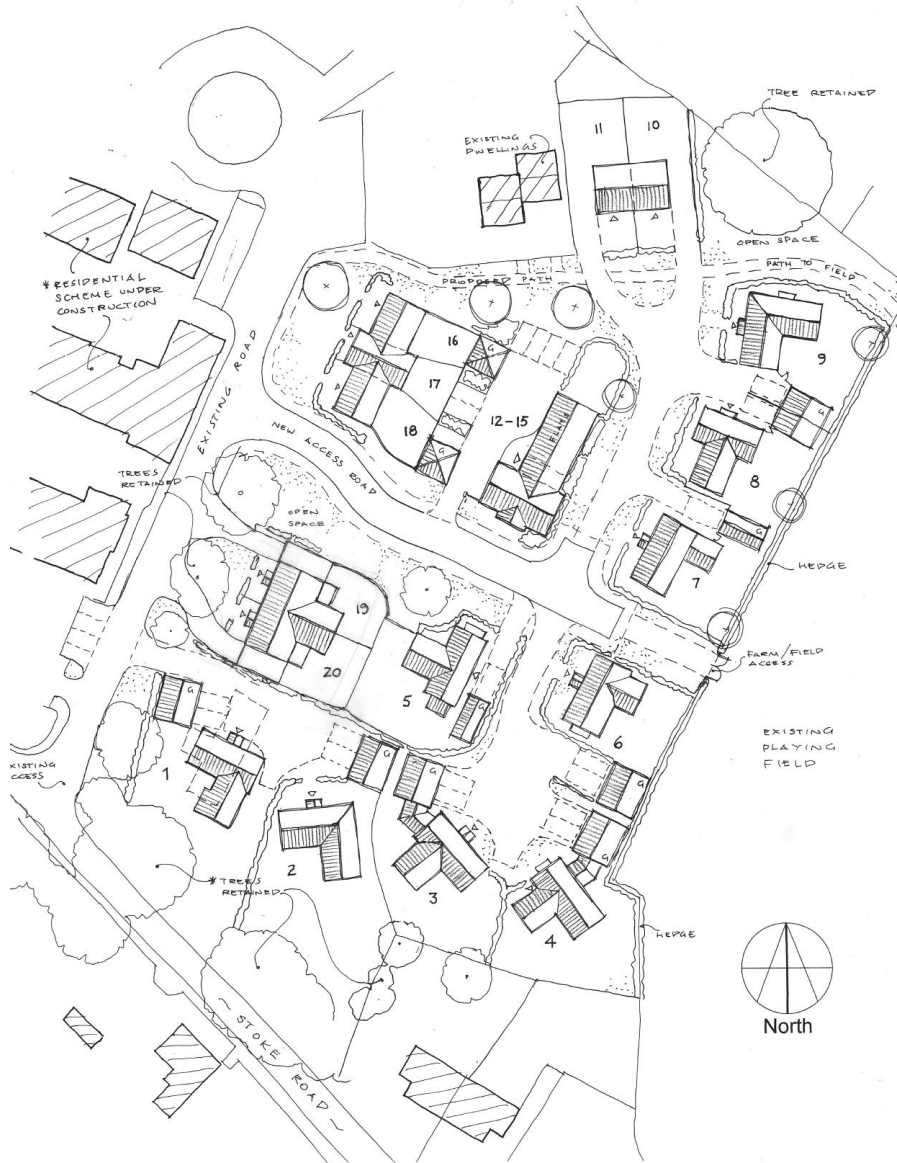




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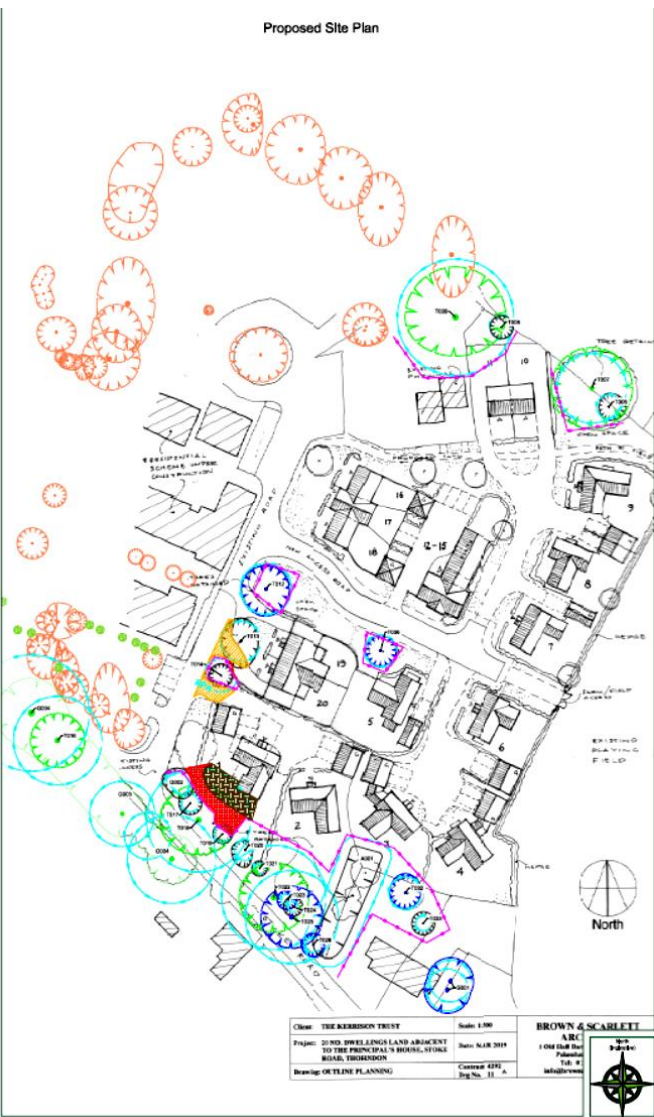
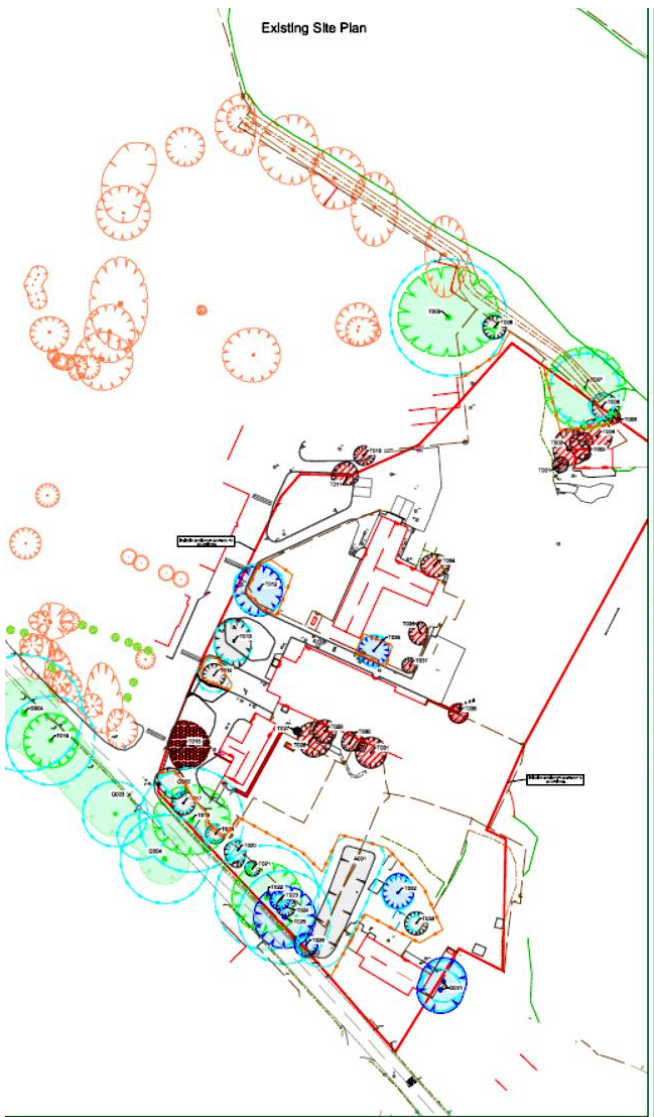


# Site Layout Plan



# Existing and Proposed Tree Plan

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Trees to be retained for retention	
Category U	Trees to be retained for retention (to be retained as they are) or to be removed and replaced with a tree of similar or greater value.
Trees to be considered for retention	
Category A	Trees of moderate size (up to 10m high) or of moderate value (10-20 years old).
Category B	Trees of moderate size (up to 10m high) or of moderate value (10-20 years old).
Category C	Trees of moderate size (up to 10m high) or of moderate value (10-20 years old).

**NOTE:**  
Hayden's Arboricultural Consultants were provided with a Topographical Survey but these do not always show the positions of all the trees/features on site. The locations of any additional features have been checked using GPS. As such the position of the trees/features should not be taken as exact but give a fair indication of their locations on site.

LEGEND	
[Symbol]	Category A Tree (10-20 years old)
[Symbol]	Category B Tree (10-20 years old)
[Symbol]	Category C Tree (10-20 years old)
[Symbol]	Category U Tree (to be retained)
[Symbol]	Category A Tree (10-20 years old)
[Symbol]	Category B Tree (10-20 years old)
[Symbol]	Category C Tree (10-20 years old)
[Symbol]	Category U Tree (to be retained)
[Symbol]	Category A Tree (10-20 years old)
[Symbol]	Category B Tree (10-20 years old)
[Symbol]	Category C Tree (10-20 years old)
[Symbol]	Category U Tree (to be retained)
[Symbol]	Category A Tree (10-20 years old)
[Symbol]	Category B Tree (10-20 years old)
[Symbol]	Category C Tree (10-20 years old)
[Symbol]	Category U Tree (to be retained)
[Symbol]	Category A Tree (10-20 years old)
[Symbol]	Category B Tree (10-20 years old)
[Symbol]	Category C Tree (10-20 years old)
[Symbol]	Category U Tree (to be retained)

Scale 1:500

0m 10m 20m 30m 40m 50m

**HAYDEN'S**  
Arboricultural Consultants

© 2015/2016/2017  
5 Moseleys Farm Business Centre  
Fornham All Saints,  
Bury St Edmunds  
Suffolk IP28 6JY  
Tel: 01284 793081  
Mobile: 07850 162400  
Email: info@haydens.co.uk  
Web: www.haydens.co.uk

Client: THE KEMBRON TRUST	Scale: 1:500	<b>BROWN &amp; SCARLETT</b> 1008 Hill Street Bury St Edmunds Suffolk IP28 6JY Tel: 01284 793081 Email: info@brownandscarlett.co.uk
Project: 3010 DWELLING LAND ADJACENT TO THE PRINCIPAL & BEAUFORT ROAD, THORNDON	Date: 14/08/2018	
Drawing: ORTHO PLAN (PART 2)	Scale: 1:500	

Dear Sirs

Following a meeting of Thorndon Parish Council at which this application was considered, I can confirm that Councillors voted to **OBJECT** to this application.

Thorndon Parish Council Councillors voted unanimously to object to this application.

Thorndon accepts and agrees controlled future development is necessary to maintain a vibrant and living village community, to this end a Neighborhood Plan is currently being drafted for Thorndon. This activity has been ongoing since late 2016 and is scheduled to be completed with the plan being 'Made' late summer 2019. The plan content and the areas included are directed by the results of a documented Community Survey held in Autumn 2016. This survey contained several questions on future housing development; the result was a resounding NO to large scale housing developments. The emerging plan has provision for several properties to be developed in the village, over the plan period. This growth will be gradual giving the location, infrastructure and community time to grow and adapt.

Twenty properties may seem small in comparison to many other developments but to Thorndon it is very large and represents a 6% increase in housing numbers. Since 2011 Thorndon has experienced a significant increase in housing numbers; 58 granted applications resulting in an increase of 21%. If this scheme is granted approval it will bring the increase to 28%, of which 17% will be at the Kerrison site alone.

If this request is granted there would, on the Kerrison site, be 59 properties when taking into account the 11 which were already on that site before any developments occurred. This, when the two accesses to the site have questionable visibility and open onto a road, at a point where narrow 'S' bends create a serious problem in passing for larger vehicles. This part of the road experienced 28,400 vehicle movements between April 5<sup>th</sup> and May 3<sup>rd</sup> in 2018; a surprisingly high number for a road which is only negotiable by the use of passing places. The application also poses potential problems with soft water flows into existing, often overloaded, watercourses. That area of the village invariably experiences surface water drainage problems in periods of high rainfall and the additional roof water resulting from twenty additional properties can only exacerbate this situation.

For a Secondary Village under Policy CS1 of the 1998 Local Plan and as a Hinterland Village under the emerging new Joint Local Plan an increase of 21% in the number of properties over a period of 8 years is very significant. It certainly raises questions around the volume of applications which were granted against certain facets of policy H3 of the 1998 plan.

The scheme also results in the loss of 3 important local services as the premises they utilise are to be demolished, these are Home-Start Mid & West Suffolk Family Support Group, Suffolk Axis Group – an organisation catering for the needs of disabled young persons and Jungle Cubs & Jungle Giants Day Nursery School, the only nursery facility in the village.

During the same period since 2011 the Thorndon CEVC Primary School has seen no real appreciable additional space providing increased pupil capacity, also the nearby primary school at Stoke Ash was closed in 2014 adding extra demand to Thorndon.

Whilst twenty houses provides a small addition to the number of houses required to be delivered by Mid Suffolk District Council and an income from New House Premium, it also rides rough shod over the expressed wishes of the Thorndon Community as can be demonstrated by the results of the 2016 survey. It will also have a potentially very negative and dangerous impact on the east end of Thorndon created by the additional traffic movements.

Regards

Amanda Thompson

Clerk to Thorndon Parish Council

## Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk).

AW Site Reference: 145783/1/0055524

Local Planning Authority: Mid Suffolk District

Site: Land Adj To The Principal's House Stoke Road Thorndon Eye Suffolk IP23 7JG

Proposal: Outline Planning Application (with some matters reserved) - Erection of 20no. dwellings and access (following demolition of existing buildings).

Planning application: DC/19/01310

**Prepared by:** Pre-Development Team

**Date:** 18 April 2019

### ASSETS

#### Section 1 - Assets Affected

Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

### WASTEWATER SERVICES

#### Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Thorndon-Catbridge Water Recycling Centre that will have available capacity for these flows

### Section 3 - Used Water Network

The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

### Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

## FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:

### Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

### Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
  - Development size
  - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
  - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

### Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
  - Development hectare size
  - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield run off rate on the following HR Wallingford website -<http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation> . For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)
  - Connecting manhole discharge location
- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)

Dear Gemma Walker,

**Subject: Land Adj To The Principal's House, Stoke Road, Thorndon, IP23 7JG Ref DC/19/01310**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/01310.

The following submitted documents have been reviewed and we recommend **approval of this application subject to conditions:**

- Flood Risk Assessment and Drainage Strategy Ref 184/2018/FRADS Rev P2
- Proposed Drainage Strategy ref 184/2018/01 Rev P1
- Proposed Drainage Strategy ref 184/2018/01 Rev P2
- Site Layout Plan 4292 Drg No 11
- Desk Based Contaminated Land Assessment ref 72808/R/001
- Stoke Road, Thorndon – Watercourse routes from site to River Dove Ref 184-2018
- Existing & Proposed Exceedance Routes and Impermeable Areas Ref 184/2018/02 P1
- Proposed Drainage Strategy Ref 184/2018/01 P2

We propose the following condition in relation to surface water drainage for this application.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
  - a. Dimensioned plans and drawings of the surface water drainage scheme;
  - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
  - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to 7.1l/s for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
  - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
  - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
  - f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
  - g. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
    - i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-

1. Temporary drainage systems
  2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
  3. Measures for managing any on or offsite flood risk associated with construction
- h. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.

The scheme shall be fully implemented as approved.

Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

2. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk.

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

#### Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act 1991
- Any works to a main river may require an environmental permit

Kind Regards

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Flood & Water Management  
Growth, Highways & Infrastructure



Your Ref:DC/19/01310  
Our Ref: SCC/CON/1181/19  
Date: 22 May 2019



**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: Gemma Walker

Dear Gemma,

**TOWN AND COUNTRY PLANNING ACT 1990**

**CONSULTATION RETURN:** DC/19/01310

**APPLICATION REF:** DC/19/01310

**PROPOSAL:** Outline Planning Application (with some matters reserved) - Erection of 20no. dwellings and access (following demolition of existing buildings).

**LOCATION:** Land adj to Kerrison Conference & Training Centre Stoke Road Thorndon Eye Suffolk IP23 7JG

**ROAD CLASS:**

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

**COMMENTS**

The NPPF focuses on the importance of promoting sustainable transport and give priority to public transport, pedestrian and cycle movements. The primary school is within the village however, there is nt a continuous footway from the site so no safe route for the vulnerable user. The proposed development is in a rural village location so there will be a reliance on the use of private cars.

At present, bus services 113/114 between Diss, Eye and Ipswich as well as some smaller services pass the development. There is not a footway to the closest bus stops so we suggest a pair of bus stops are constructed adjacent to the site in the highway verge. These works can be completed under a s278 agreement.

**CONDITIONS**

ER 2 - Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

B 2 - Condition: Before the development is commenced details of the areas to be provided for presentation and storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

P 1 - Condition: The use shall not commence until the area(s) within the site shown on 4292/11 for the purposes of [LOADING, UNLOADING,] manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

HGV CONSTRUCTION - Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

#### NOTES

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Yours sincerely,

**Samantha Harvey**  
**Senior Development Management Engineer**  
Growth, Highways and Infrastructure

Resource Management  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Ipswich IP6 8DL

Enquiries to: Abby Antrobus  
Direct Line: 01284 741231  
Email: [abby.antrobus@suffolk.gov.uk](mailto:abby.antrobus@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2019\_01310  
Date: 01/04/2019

For the attention of Gemma Walker

Dear Mr Isbell

**Planning Application DC/19/01310 – Land adj. Kerrison Conference and Training Centre, Stoke Road, Thorndon: Archaeology**

The above proposal lies within a site of archaeological potential, on the edge of the historic Standwell Green or Thorndon Green (THD 021). Medieval and Anglo-Saxon objects are recorded to the Northwest (THD 023). There is particular potential for archaeological remains along the southern site frontage, relating to medieval occupation on the green. Groundworks associated with development have potential to impact on archaeological remains which may survive.

There are no grounds to consider refusal of permission to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 199), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following conditions would be appropriate, staged to allow clear points of discharge:

- 1) No development shall take place until a scheme of archaeological evaluation of the site has been submitted to and approved in writing by the Local Planning Authority (including any demolition needing to be carried out as necessary in order to carry out the evaluation). The evaluation shall be carried out in its entirety as may be agreed to the satisfaction of the Local Planning Authority,
- 2) No development shall take place until a written report on the results of the archaeology evaluation of the site has been submitted to the Local Planning Authority and that confirmation by the Local Planning Authority has been provided that no

further investigation work is required in writing. Should the Local Planning Authority require further investigation and works, no development shall take place on site until the implementation of a full programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording.
- b. The programme for post investigation assessment.
- c. Details of the provision to be made for analysis of the site investigation and recording.
- d. Details of the provision to be made for publication and dissemination of the analysis and records of the site investigation.
- e. Details of the provision to be made for archive deposition of the analysis and records of the site investigation; and
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

The written scheme of investigation shall be carried out in its entirety prior to any other development taking place, or in such other phased arrangement including a phasing plan as may be previously approved in writing by the Local Planning Authority.

Reason - To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development. This condition is required to be agreed prior to the commencement of any development to ensure features of archaeological importance are identified, preserved and secured to avoid damage or loss resulting from the development and/or its construction. If agreement was sought at any later stage, there is an unacceptable risk of loss and damage to archaeological and historic assets.

- 3) No building shall be occupied until the archaeology evaluation, and if required the Written Scheme of Investigation, have been completed, submitted to and approved, in writing, by the Local Planning Authority. Furthermore, no building shall be occupied until analysis, publication and dissemination of results and archive deposition from the archaeology investigations as agreed under the Written Scheme of Investigation has taken place, unless an alternative agreed timetable or phasing for the provision of results is agreed in writing by the Local Planning Authority.

Reason - To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development.

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work. In this archaeological evaluation in the first instance will characterise archaeological remains and enable mitigation strategies to be developed (either upfront excavation, or monitoring of contractor's groundworks).

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Dr Abby Antrobus

Senior Archaeological Officer  
Conservation Team

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: FS/F191008  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 03/04/2019

Dear Sirs

**Land adj. to the Principal's House, Stoke Road, Thorndon IP23 7JG**  
**Planning Application No: DC/19/01310/OUT**  
**Hydrants are required for this development**  
**(see our required conditions)**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

**Water Supplies**

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

**Sprinklers Advised**

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: [info@brownandscarlett.co.uk](mailto:info@brownandscarlett.co.uk)

Enc: Sprinkler information

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: ENG/AK  
Enquiries to: Mrs A Kempen  
Direct Line: 01473 260486  
E-mail: Angela.Kempen@suffolk.gov.uk  
Web Address: www.suffolk.gov.uk

Date: 3 April 2019

**Planning Ref: DC/19/01310/OUT**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land adj. to the Principal's House, Stoke Road, Thorndon IP23 7JG**  
**DESCRIPTION: 20 dwellings**  
**HYDRANTS REQUIRED**

**If the Planning Authority is minded to grant approval, the Fire Authority require adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.**

**If the Fire Authority is not consulted at the planning stage, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.**

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

**Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.**

Continued/



OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

Mrs A Kempen  
Water Officer

Your ref: DC/19/01310/OUT  
Our ref: 00058598  
Date: 09 April 2019  
Enquiries: Isaac Nunn  
Tel: 01473 265248  
Email: [isaac.nunn@suffolk.gov.uk](mailto:isaac.nunn@suffolk.gov.uk)



Gemma Walker  
Mid Suffolk District Council  
Planning Department,  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Dear Ms Walker,

**Thorndon, Land Adj To Kerrison Conference And Training Centre, Stoke Road IP23 7JG**

I refer to the proposal: Outline Planning Application (with some matters reserved) - Erection of 20no.dwelling and access (following demolition of existing buildings).

Policy Background

The Mid Suffolk Local Plan addresses the provision of infrastructure alongside new development in Policy CS6:

*New development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development.*

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and charges CIL on planning permissions granted after 11 April 2016. Regulation 123 requires Mid Suffolk to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The details of the impact on local infrastructure serving the proposed development are set out below and will form the basis of a future bid for CIL funds by the County Council.

- 1. Education.** Paragraph 94 of the NPPF states: 'It is important that a sufficient choice of school places is 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 schools through the preparation of plans and decisions on applications;  
*and*

- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

SCC anticipates the following **minimum** pupil yields from proposed development:

Phase	Pupil Numbers	Places Required	Cost per Place	Requirement per School Phase
Primary	5	5	£12,181	<b>£60,905</b>
High	3	3	£18,355	<b>£55,065</b>
Sixth	1	1	£19,907	<b>£19,907</b>
<b>Total CIL requirement</b>				<b>£135,877</b>

The catchment primary school for this development is Thorndon CEVCP. Hartismere School, in Eye, is the nearest secondary school and sixth form. Both schools currently have a deficit of places. It will be necessary to perform work to create places, even if the number of additional places is too low to justify increasing the footprint of either school. Therefore, the funding outlined above will be required to accommodate all the generated demand.

Additionally, since Hartismere School is not within safe walking distance of the development, the developer must provide contributions to fund the anticipated secondary-age pupils over five years. The annual cost of transporting a pupil is £960. 3 pupils x 5 years x £960 = £14,400 school transport contribution. This contribution will be secured via a s106 planning obligation.

**2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'.

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

In the ward of Wetheringsett there is an existing surplus of 32 FTE spaces. SCC would anticipate this development generating need for 2 FTE places.

We therefore do not envisage seeking CIL funds to provide additional pre-school places.

- 3. Transport issues.** Refer to the NPPF Section 9 'Promoting sustainable transport'. An assessment of highways and transport issues will be required as part of the planning application. This will include pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278.

Paragraph 108 of the NPPF requires of applications for development 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; *and*
- c) 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.

Stoke Road, by which the development is accessed, carries bus services between Diss, Eye, and Ipswich. However, the closest stops are currently some distance away, outside the Black Horse Inn, in Thorndon proper and there is not a footway to them from the site. In order to provide access to the bus network, it will be necessary to construct appropriate bus stops and short associated footways on the highway outside this development.

The location of the bus stop on the development side of the road would be in the developer's ownership, and the opposite stop would be on the highway verge. Delivery of these highway improvements will be by way of a s278 agreement with the developer. If granted, planning permission should be subject to a condition which secures this s278 agreement. The exact nature and detail of the planning obligation will depend on landownership issues relating to the width of the highway verge, which we are currently investigating.

A detailed response covering other highways issues will be provided by the SCC Highways team.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated 2015).

- 4. Libraries.** Refer to the NPPF Section 8: 'Promoting healthy and safe communities'.

The libraries and archive infrastructure provision topic paper set out the detailed approach to how contributions are calculated. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assuming an average of 2.4 persons per dwelling, CIL funding of £216 per dwelling will be sought. This results in a total of £4,320.

- 5. Waste.** Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

*New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.*

SCC requires that waste bins and garden composting bins be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

- 6. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; *and*
- d) where possible, provide multifunctional benefits.'

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

Detailed advice from the county floods service has been provided directly to Mid Suffolk.

- 7. Archaeology.** Suffolk County Council Archaeological Service will require a condition to secure a programme of archaeological work on this site. Specific details will be provided in a separate response by the service.
- 8. Health impact assessment.** An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding should be undertaken. We recommend seeking advice on this matter from the NHS West Suffolk Clinical Commissioning Group.
- 9. Police assessment.** We recommend consulting Suffolk Constabulary with regard to any local policing infrastructure, facilities, or funding required as a result of this development. At the design stage, we recommend that thought should be put into integrating natural surveillance and 'designing out crime'.
- 10. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions, which are detailed in a separate response from the fire service. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service always asks that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting.
- 11. Superfast broadband.** This should be considered as part of the requirements of the NPPF Section 10 'Supporting high quality communication'. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange-based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

Time-limit to information

The above information is time-limited for 6 months only from the date of this letter.

The above will form the basis of one or more bids for CIL funds and/or negotiated legal agreements if planning permission is granted.

Yours sincerely,

Isaac Nunn  
Planning Officer  
Growth, Highways & Infrastructure Directorate – Strategic Development

**From:** David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>  
**Sent:** 17 April 2019 10:37  
**To:** Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** DC/19/01310 Land Adj To The Principal's House, Stoke Road, Thorndon

Gemma

I have no objection in principle to this application subject to it being undertaken in accordance with the measures outlined in the accompanying arboricultural report. Although a number of trees are proposed for removal they are of limited amenity value and/or poor condition and their loss will have negligible impact upon the character of the local area. If you are minded to recommend approval we will also require a detailed Tree Protection Plan and Arboricultural Method Statement in order to help ensure harm is not caused to the trees scheduled for retention, this can be dealt with under condition.

Please let me know if you require any further input.

Regards

David

**David Pizzey** FARborA  
Arboricultural Officer  
Tel: 01449 724555  
[david.pizzey@baberghmidsuffolk.gov.uk](mailto:david.pizzey@baberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)  
Babergh and Mid Suffolk District Councils – Working Together

-----Original Message-----

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>  
**Sent:** 16 April 2019 09:10  
**To:** David Pizzey <[David.Pizzey@baberghmidsuffolk.gov.uk](mailto:David.Pizzey@baberghmidsuffolk.gov.uk)>  
**Subject:** MSDC Planning Re-consultation Request - DC/19/01310

Please find attached planning re-consultation request letter relating to planning application - DC/19/01310 - Land Adj To The Principal's House, Stoke Road, Thorndon, Eye Suffolk IP23 7JG

Kind Regards

Planning Support Team

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Dear Gemma

**EP Reference : 257239**

**DC/19/01310. Land Contamination**

**Land at Kerrison, Stoke Road, Thorndon, EYE, Suffolk.**

**Outline Planning Application (with some matters reserved) - Erection of 20no. dwellings and access (following demolition of existing buildings).**

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@babermidsuffolk.gov.uk](mailto:Nathan.pittam@babermidsuffolk.gov.uk)

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websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)



**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*

2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

Thank you for consulting me on the above outline application for the erection of 20 dwellings following demolition of existing buildings.

I can confirm with respect to noise and other environmental health issues that I do not have any adverse comments and no objection to the proposed development.

Noise and dust from the construction phase, however, may be apparent to existing occupiers of neighbouring dwellings. I would, therefore, recommend that any approval is conditioned to include a Construction Management Plan to minimise any adverse impacts from this phase of the development:

Prior to the commencement of development, details of the construction methodology shall be submitted in a construction management plan. Any such plan shall be approved by the planning authority and incorporate the following information:

- a) Details of the hours of work/construction of the development within such operations shall take place at the site (usually between 8am and 6pm weekdays; 8am and 1pm Saturday with no working Sunday and any Bank Holidays.)
- b) Details of the storage of construction materials on site, including details of their maximum storage height.
- c) Details of how construction and worker traffic and parking shall be managed to avoid parking on street and conflicts with other road users.
- d) Details of any protection measures for footpaths surrounding the site.
- e) Details of any means of access to the site during construction.
- f) Details of the scheduled timing/phasing of development for the overall construction period.
- g) Details of any wheel washing to be undertaken, management and location it is intended to take place.
- h) Details of the siting of any on site compounds and porta loos.
- i) Details of the method of any demolition to take place, including the recycling and disposal of said materials resulting from demolition.
- j) Details of proposed arrangements for notifying neighbours of the commencement of works and contact details in case of enquiries.

The construction shall be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority

Reason - To minimise detriment to nearby residential and general amenity by controlling the construction process to achieve the approved development. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, by reason of the location and scale of development may result adverse harm on amenity.

I trust this advice is of assistance

David Harrold MCIEH  
Senior Environmental Health Officer

**Babergh & Midsuffolk District Councils**  
t: 01449 724718  
e: [david.harrold@baberghmidsuffolk.gov.uk](mailto:david.harrold@baberghmidsuffolk.gov.uk)

From: Iain Farquharson <Iain.Farquharson@babberghmidsuffolk.gov.uk>  
Sent: 16 April 2019 11:15  
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>  
Subject: 257251. MSDC Planning Consultation Request - DC/19/01310

Dear Sir/Madam

We have reviewed this application and while we note it is for outline permission we are disappointed that there is no mention, consideration or allowance for sustainability features and measures.

For a large application such as this we require some indication even at this early stage what commitments the applicant is willing to make on the topics of sustainability, energy and carbon reduction, water use, renewable and low carbon technologies.

As there is no information on these topics there is nothing upon which we can make an informed decision therefore we must request refusal of permission.

Should permission be granted we request condition(s) are included to ensure the development is as sustainable as possible:

A Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3 SO8 and NPPF para 35) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water ( suggested maximum of 105ltr per person per day). Details as to the provision for electric vehicles should also be included. This document shall be submitted to, and approved in writing by, the Local Planning Authority before works extend beyond foundation level.

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Clear commitments and minimum standards should be declared and phrases such as 'where possible, subject to, where feasible' must not be used.

Evidence should be included where appropriate demonstrating the applicants previous good work and standards achieved in areas such as site waste management, eg what recycling rate has the applicant achieved in recent projects to show that their % recycling rate commitment is likely.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmental-management/planning-requirements/>  
<https://www.babergh.gov.uk/environment/environmental-management/planning-requirements/>

Iain Farquharson

Senior Environmental Management Officer  
Babergh Mid Suffolk Council

01449 724878 / 07860 827027  
[//iain.farquharson@babberghmidsuffolk.gov.uk](mailto://iain.farquharson@babberghmidsuffolk.gov.uk)

Good Afternoon,

Whilst we would welcome commercial and employment use at this site should it be proposed, previous employment here would have been related to the community uses that have now ceased. We therefore have no comment to make on this application.

Kind Regards

Clare

**Economic Development Officer – Open for Business team  
Babergh and Mid Suffolk District Councils – Working Together**

**t: 01449 724880**

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**w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)**

**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Gemma Walker – Senior Planning Officer  
From: Sacha Tiller - Housing Enabling Officer – Strategic Planning  
Date: 30<sup>th</sup> May 2019  
SUBJECT: - **Outline Planning: DC/19/01310**

Proposal: Outline Planning Application (with some matters reserved) - Erection of 20no. dwellings and access (following demolition of existing buildings)

Location: Land Adj To The Principal's House, Stoke Road, Thornton, Eye, Suffolk, IP23 7JG

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**Key Points**

**1. Background Information**

A development proposal for twenty (20) residential dwellings
This is an open market development and based on 20 units should offer 7 affordable housing units = 35% policy compliant position.

**2. Housing Need Information:**

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for 94 **new affordable homes per annum**.

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

<b>Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number</b>	
<b>Bed Nos</b>	<b>% of total new affordable stock</b>
1	46%
2	36%
3	16%
4+	2%

2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

Ref3 Estimated proportionate demand for all tenure new housing stock by bedroom number	
Bed Nos	% of total new stock
1	18%
2	29%
3	46%
4+	6%

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property-owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa. 890 applicants registered for affordable housing in Mid Suffolk at May 2019.

2.7 This application is for a S106 planning obligation site, so the affordable housing provided will be to meet district wide need hence the **890** applicants registered is the important number.

**3. Preferred Mix for Open Market homes.** The development is proposing an indicative open market mix of: -

- 13 open market houses – ranging from 1 bed flats to 4/5 bedroom houses.

We would welcome clarification on:

- the number of bedrooms for each dwelling
- location of each type of dwelling on the plan
- size of each dwelling (sqm)

The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.
- 25% of households think their current property will not be suitable for their needs in 10 years' time.

- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

#### **4. Proposed mix for Affordable Housing**

4.1 At present 7 of the proposed dwellings on the development will be for affordable housing.

##### **The proposed affordable housing is:**

- 4 x 1 bedroom units (no sizes, location or persons specified)
- 2 x 2 bedroom units (no sizes, location or persons specified)
- 1 x 3 bedroom unit (no sizes, location or persons specified)

##### **Preferred mix for Affordable Housing**

###### **Affordable Rent = 5**

- 3 x 2 bed 4 person houses @ 79sqm
- 2 x 3 bed 5 person houses @ 93sqm

###### **Shared Ownership = 2**

- 2 x 3 bed 5 person house @ 93sqm

4.2 There have been no space standards provided therefore these have been detailed above. Any future design and layout information should clearly specify the intended sizes of all dwellings.

**The above mix is requested and to be included in the S106 agreement.**

#### **5. Other requirements for affordable homes:**

- Properties must be built to current Homes England Housing Technical Standards March 2015.
- The council is granted 100% nomination rights to all the affordable units on first lets and a minimum of 75% on relets. A draft Nomination agreement should form one of the S106 agreement schedules.
- Adequate parking provision is made for the affordable housing units.
- Shared ownership initial shares should not exceed 70%.
- The affordable housing should be delivered at the same time as open market dwellings – a trigger mechanism should be included in the S106 agreement.

Sacha Tiller – Housing Enabling Officer – Strategic Housing



# Agenda Item 7d

## Committee Report

Item 7D

Reference: DC/17/02782

Case Officer: Mark Russell

Ward: Thurston

Ward Members: Cllr Harry Richardson, Cllr Wendy Turner

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## RECOMMENDATION – Grant Outline Planning Permission

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### Description of Development

Outline Planning Application (Access to be considered)- Erection of 15 dwellings (including 5 affordable bungalows)

### Location:

Land Off Church Road Access Via Garden Of 'The Firs' Thurston

Parish: Thurston

Expiry Date: 23.08.2017

Application Type: Outline planning application

Development Type: Major Small Scale - Dwellings

Applicant: Honeycroft Properties Ltd

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## PART ONE – REASON FOR REFERENCE TO COMMITTEE

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The application is referred to committee for the following reason:

It is a 'Major' application for:

- a residential development for 15 or more dwellings.

### Details of Previous Committee/Resolutions and Member Site Visit

None

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## PART TWO – POLICIES AND CONSULTATION SUMMARY

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### Summary of Policies

Relevant policies in the Core Strategy Focused Review 2012 and Mid-Suffolk Local Plan 1998:

CS01 - Settlement Hierarchy

CS03 - Reduce Contributions to Climate Change  
CS04 - Adapting to Climate Change  
CS05 - Mid Suffolk's Environment  
CS06 - Services and Infrastructure  
CS09 - Density and Mix  
CL 11 - Retaining high quality agricultural land  
FC03 - Supply Of Employment Land  
FC01 - Presumption In Favour Of Sustainable Development  
FC01\_1 - Mid Suffolk Approach To Delivering Sustainable Development  
GP01 - Design and layout of development  
H 13 - Design and layout of housing development  
H 15 - Development to reflect local characteristics  
H 16 - Protecting existing residential amenity  
T1 0 - Highway Considerations in Development  
FC02 - Provision and Distribution of Housing  
H07 - Restricting housing development unrelated to needs of countryside  
H14 - A range of house types to meet different accommodation needs  
H17 - Keeping residential development away from pollution  
T09 - Parking Standards  
RT04 - Amenity open space and play areas within residential development  
RT12 - Footpaths and bridleways  
CL08 - Protecting wildlife habitats  
National Planning Policy Framework (NPPF)

### **Supplementary Planning Documents**

SCC Suffolk Adopted Parking Standards (2015)

### **Consultations and Representations**

During the course of the application consultation and representations from third parties have been received. These are summarised below.

## **A: Summary of Consultations**

### **Thurston Parish Council**

OBJECTION due to being unsustainable; CIL yield not being sufficient to offset cumulative effects of this and other developments on infrastructure; poor highway visibility and lack of footways, lack of priority to pedestrians and cycle users; outside of settlement boundary and isolated from services; failure to respect local character; flood risk; negative impact on existing residents; this site should be considered as part of the cohesive approach of the other Thurston sites.

### **Contaminated Land**

No objection, but a standard contaminated land condition required.

### **Environmental Health: Noise/Odour/Light/Smoke**

No objection – condition hours of work.

### **Floods**

Recommended approval, subject to conditions relating to details of a SUDS scheme, management of the scheme and a Construction Surface Water Management Plan.

### **Heritage**

No harm to a designated heritage asset because the site makes little contribution to the setting of nearby listed buildings (Thurston House, Pepper Cottage and others) and the proposal has no material impact.

### **Environment Agency**

No objection, subject to the development being contained outside of Flood zones 2 and 3. Also recommended a Flood Evacuation Plan.

### **Anglian Water**

Advised that a sewage pumping station was nearby and that the applicant should ensure that no part of the development was within 15 metres of it.

The foul sewerage network is capable of taking the required flows, however the submitted drainage assessment was insufficient.

A condition was proposed requiring a drainage strategy.

### **SCC Highway Authority**

We have reviewed the data supplied with this application, the summary of our findings are as follows: □ The proposed visibility splays for the accesses are sufficient for this application. □ The proposal for 15 dwellings would create approximately 9 vehicle movements within the peak hour (1 vehicle every 6 minutes) therefore the additional vehicles from the development will not have a severe impact on the capacity of the highway network in the area. □ The closest bus stop is within 300m from the centre of the site with public transport services. □ There is a proposal to create a footway from the site to the existing footway network in Church Road provided links for pedestrians and cyclists to bus stops, schools and the amenities within the village. □ Thurston rail station is approx 0.6 miles from the site which is within cycling

distance. The development would not have a severe impact on the highway network (NPPF para 109) therefore we do not object to the proposal.

### **Arboricultural Officer**

Based on this information, the two mature Lime trees proposed for removal form part of a prominent natural feature that contributes considerably to the character of the local area. Loss of the trees will weaken this feature to a notable degree and therefore I'm unable to support the application in its current form. If the loss is unavoidable to facilitate the development and you are minded to recommend approval I would advise significant replacement planting in mitigation subject to agreement.

### **Place Services (Ecology)**

Following an initial holding objection due to the lack of ecological information about residual impacts on priority species, Ecology is now satisfied that there is sufficient ecological information available for determination, subject to following recommendations which will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

### **Place Services (Landscapes)**

No objection, but suggested improvements and mitigation.

### **Archaeology**

No objection, standard conditions.

### **Countryside and Public Realm**

There is a sufficient amount of amenity space planned for a development of this size. Further details should be submitted under reserved matters concerning any amenity facilities.

### **Communities**

No comments.

### **SCC Fire and Water**

Standard comments (i.e. supply of fire hydrants and development to comply with Building Regulations).

### **SCC Strategic Infrastructure**

In addition to the standard CIL charging, Infrastructure advised that contributions were also required through a s.106 agreement as follows:

Total primary school S106 contribution towards a new school:

£65,716 + £7,060 = £72,776 (£4,852 per dwelling);

Total early years S106 contribution towards a new facility:

£29,060 (£1,937 per dwelling).

NOTE – these comments were just over six months ago and the amounts quoted will need to be index linked.

## **Strategic Housing**

The composition of the affordable homes needs to be changed to 2 x 2 bed houses and 3 x 2 bed bungalows – all built to meet Nationally Described Space standards. The **open market mix is not supported** as it does not meet the needs of those in the village/district wishing to buy their first home or to downsize/right-size for those currently living in larger 3, 4 and 5 bed homes.

OFFICER COMMENT – The application at hand is Outline and for access only. The required mix of affordable housing can be secured by s.106 at this stage. With a recommendation that this s.106 be signed within six months of committee's resolution (and refused if this is not done). The open market mix can be revisited at the Reserved Matters stage.

## **B: Representations**

Thirteen letters of representation were received from nearby properties, twelve of these were objections, with one mixed.

The neighbour objections covered the following points:

- Dangerous access on a narrow country lane;
- Volume of traffic;
- Traffic calming measures required;
- Ecology;
- Boundary issues;
- Building work;
- Dominating/overbearing;
- Drainage issues;
- Increase in pollution;
- Landscape impact;
- Loss of privacy;
- Loss of view;
- Loss of parking;
- Loss of light;
- Inadequate public transport provision;
- More open space required;
- Out of character;
- Strain on facilities;
- Decreased property value;
- Effect on trees;
- Already too many planned houses in Thurston;
- Cycle lane should be provided;
- Historic area should be protected from development

The neutral comment came from the owners of a nearby new dwelling, they requested a 2.4 metre high brick and flint wall and that the Reserved Matters layout follow that being shown at Outline.

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## **PART THREE – ASSESSMENT OF APPLICATION**

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### **1.0 The Site and Surroundings**

- 1.1 The site is outside of the settlement boundary on agricultural land to the south of the village of Thurston. To the north is the Ipswich – Bury railway line, to the east is Church Road including the bungalow cul-de-sac Woodland Close, a newly-approved dwelling and a lightly-treed area. The remainder of the site is bordered by agricultural land, which is bordered by trees to the south and sweeping north-westwards. The westernmost boundary is a 75 metre stretch of open field, with no distinct boundary separating it from the remaining agricultural field.
- 1.2 The site does not contain any constraints other than part of it falling within flood zone 3.

### **2.0 The Proposal**

- 2.1 The application seeks Outline Planning permission (access to be considered) for the erection of 15 dwellings.
- 2.2 The site area is 4 ha, giving a very low density of just under four dwellings per hectare. When allowing for the indicated pond and amenity land (approximately 10 per cent of the site) the density is just over four per hectare, giving average plot sizes of 2,400m<sup>2</sup>.

### **3.0 Policy Background**

- 3.1 Core Strategy and Focused Review
- 3.2 Policy CS1 provides that the majority of employment, retail and housing development shall be directed to towns and key service centres. Policy CS2 provides a list of possible development in the countryside.
- 3.3 Members will be aware that the above policies were recently criticised in the Woolpit public enquiry and should be given limited weight.
- 3.4 Policy CS4 provides that all development will contribute to the delivery of sustainable development and reflect the need to plan for climate change and then outlines issues of flood risk, pollution and biodiversity. Also included is encouragement of the implementation of Sustainable Urban Drainage Systems (SUDs). There are no principle issues raised in CS4 to resist the proposed development or make it contrary to the development plan.
- 3.5 Policy CS5 provides that all development will maintain and enhance the environment, including the historic environment, design and landscape and retain the local distinctiveness. There are no principle issues involved in this policy given this is an outline application.
- 3.6 Policy CS9 provides requirements on the density and mix of new housing development. The policy seeks a mix of types, sizes and affordability in terms of residential schemes, but does not set any

specific levels or percentages to achieve. The policy also provides that new development should provide an average density of at least 30 dwellings per hectare.

- 3.7 In this proposal, the density is significantly below 30 per ha, but is held to be commensurate with this rural, edge of settlement location.
- 3.8 The CSFR was adopted by Full Council on 20 December 2012 and should be read as a supplement to Mid Suffolk's adopted Core Strategy (2008). This document updates some of the policies of the 2008 Core Strategy as already addressed above. The CSFR document does introduce new policy considerations, including Policy FC 1 - Presumption in favour of sustainable development that refers to the National Planning Policy Framework (NPPF) objectives and Policy FC 1.1 - Mid Suffolk approach to delivering Sustainable Development that provides "development proposals will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development as interpreted and applied locally to the Mid Suffolk context through the policies and proposals of the Mid Suffolk new style Local Plan.
- 3.9 Proposals for development must conserve and enhance the local character of the different parts of the district. They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and the policies of the Mid Suffolk Core Strategy and other relevant documents."
- 3.10 Members will be aware that the weight to be attached to the 1998 Local Plan must be considered carefully by reference to the NPPF to ensure consistency.
- 3.11 The saved Local Plan through policies GP1, H 13, H 15, H 16, and T10 supports good design that reflects Suffolk character, avoids adverse impacts on amenity and considered traffic and highway implications of development. Policy HB1 while not wholly NPPF compliant refers to setting of historic buildings and along with other policies including employment matters shall be considered in the detailed assessment below.
- 3.12 During the course of this application, Thurston's Neighbourhood Plan has been examined and once changes are made will advance to a local referendum. This gives it an increased weight when considering the application at hand. The Plan does not promote any allocations as such, but instead focuses policies to retain and enhance residential design, address highway capacity, secure contribution requirements to the provision of key infrastructure, and dwelling mix proportions.
- 3.13 Whilst the plan does not support housing at this location, the scheme does provide for the required contributions and does not impact on Highway capacity such that it should be refused. Matters of design and dwelling mix can be assessed at the Reserved Matters stage, by which time it is possible that the Neighbourhood Plan will be "made."

#### **4.0 The Principle of Development**

- 4.1 Sustainability. The site is outside of the Built Up Area Boundary of Thurston, but is contiguous with the village.
- 4.2 Thurston is a Key Service Centre, one of a dozen within Mid Suffolk. The Mid Suffolk Core Strategy states at Policy CS1 that these should be "the main focus for development outside of the towns." This is further emphasised at CS8 "Provision and Distribution of Housing" which states that such settlements should be the focus for housing growth in preference to Primary and Secondary villages.

- 4.3 The site is detached from the main village by the railway line in the same way that, to the west, the area between the line and Beyton Road is fully built-out with houses, as is the small area to the east (Woodland Close),
- 4.4 The railway station (in effect a 1.3km walk) has direct trains to Bury St. Edmunds, Newmarket, Cambridge and Ipswich. Thurston Primary School, a butcher's and hair salon are 350 metres away, St. Peter's Church 400 metres.
- 4.5 Many of the village's facilities are approximately 1.3 – 1.5 kilometres away, in the vicinity of the station i.e. a pharmacy, a day nursery, a sandwich bar, an estate agent's, a fish and chip shop, grocery, post office and the Fox and Hounds public house.
- 4.6 The site's environmentally sustainable credentials are, therefore, mixed, with non-car-borne access to some facilities a very real possibility, but some dependence on car use to access these facilities equally likely.
- 4.7 The economic strand to sustainability sees the usual transient boost whilst the development is built out. In addition, a potential 40-plus residents would add spend to local concerns. It is accepted that most spend by locals will be in Bury or further afield, but these extra residents will contribute to the local economy.
- 4.8 Socially, the development is physically severed from the main part of Thurston. The new residents will call on the same services, such as schools, as existing residents. Given this, and the provision of affordable housing, the development is held to be socially inclusive and socially sustainable.

## **5.0 Infrastructure**

- 5.1 The Infrastructure team has indicated that there is a shortfall in education provision in the area. It confirms that a new primary school is proposed. The issue of a five scheme limit contributing towards new builds has been mentioned.
- 5.2 However, the school is to be built in two phases, and the Infrastructure team has confirmed that monies can be allocated from this scheme.

## **6.0 Site Access, Parking and Highway Safety Considerations**

- 6.1 The Highway Authority requested a footpath link underneath the railway bridge, this has now been shown on the submitted drawings. The required access and visibility splays are also shown to be achievable. Whilst in Outline, it is clear that sufficient parking is also possible.

## **7.0 Design and Layout**

- 7.1 Policy CS5 requires development to be of a high-quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district. Policies H13 and GP1 contain further commentary as to what is expected of developers in this regard. Paragraph 56 of the NPPF attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development.
- 7.2 As the proposal is Outline (with only access being sought here), matters of layout and design are left to the Reserved Matters stage. However, it is beholden on the applicant to demonstrate that the desired quantum of development can be satisfactorily achieved.
- 7.3 The submitted drawing show that the site is more than capable of containing the quantum of development applied for, albeit that some of the units may have to be reduced in size.



## **8.0 Landscape Impact, Trees, Ecology, Biodiversity and Protected Species**

- 8.1 Policy CS5 of the Core Strategy seeks to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encouraging development that is consistent with conserving its overall character.
- 8.2 The Ecology specialist, after raising concerns over several omissions in the submitted documents, has withdrawn their objection.
- 8.3 A point of contention is the proposal to remove two trees. Our tree specialist has advised that these are of landscape value and, if they have to be removed, significant replacement planting should be provided in mitigation.

## **9.0 Impact on Residential Amenity**

- 9.1 Policy H13 of the Local Plan seeks to ensure new housing development protects the amenity of neighbouring residents. Policy H16 of the Local Plan seeks to protect the existing amenity of residential areas.
- 9.2 Paragraph 17 of the NPPF sets out a number of core planning principles as to underpin decision-taking, including, seeking to secure a good standard of amenity for all existing and future occupants of land and buildings.
- 9.3 As this Outline application seeks Access only, the height of buildings will be established at Reserved Matters. It is therefore not technically necessary to assess potential overlooking or overshadowing in any detail. It is worth noting, however, that two-storey dwellings are the most probable.
- 9.4 With the exception of plots 1-5 at the eastern edge of the site, there is not likely to be any issue arising. The mentioned plots would be back-to-back with the bungalows of Woodland Close. This matter would need to be carefully looked at during the Reserved Matters application to ensure no adverse overlooking, especially to numbers 7 and 8 Woodland Close, which are shown as being approximately 25 metres from the rear walls of the proposed dwellings.
- 9.5 There would not be any issue of overshadowing, given the proposed layout and the spaces around the site.

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## **PART FOUR – CONCLUSION**

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### **10.0 Planning Balance and Conclusion**

- 10.1 The site in question is not allocated, but the lack of a five-year housing supply is a serious material consideration.
- 10.2 The site is contiguous with the built form of Thurston and, whilst separated from the main village by a railway, is reasonably well connected to some, if not all, facilities and services. It is, therefore, held to be reasonably sustainable environmentally, economically and socially.

- 10.3 There are no concerns in terms of Highway safety and efficiency or ecology and, whilst concerns about the loss of trees have been raised, these can be overcome with comprehensive planting.
- 10.4 Given the proposed density, the separation from existing dwellings and the proposed planting buffer to ensure residential amenity, the quantum of development sought is achievable, whilst ensuring adequate garden size and parking provision.
- 10.5 Whilst some major trees stand to be lost, these can be replaced by a comprehensive planting scheme.
- 10.6 The proposal also offers affordable housing, which will help towards the Council's objectives regarding affordable provision.
- 10.7 The proposal is, therefore, on balance acceptable and Approval is recommended.

## 11.0 RECOMMENDATION

That authority be delegated to the Acting Chief Planning Officer to grant outline planning permission:

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

- Affordable Housing – 2 x 2-bed (Affordable Rent), 3 x 2-bed (Shared Ownership).
- Primary school S106 contribution: £72,776
- Early years S106 contribution: £31,966

**(2) That the Acting Chief Planning Officer be authorised to grant Planning Permission upon completion of the legal agreement subject to conditions as summarised below and those as may be deemed necessary by the Acting Chief Planning Officer:**

- Approved Plan showing indicative layout and access
- Reserved Matters
- Visibility splays as SCC Highways recommend
- Footway (including under the rail bridge) to be provided
- Carriageway widening
- Details of loading/unloading
- Construction Management Plan including working hours to agree
- Archaeology to be agreed
- Surface water drainage scheme (details of)
- Surface water drainage scheme (implementation/maintenance of)
- Construction Surface Water Management Plan
- Surface Water Management Strategy
- No buildings within flood zones 2 or 3
- Removal of pd for flood zone areas
- Land contamination
- Farmland bird survey
- Biodiversity Method Statement
- Wildlife-friendly lighting

- Phasing Condition (To allow phasing of the development and allows spreading of CIL payments)
- Fire hydrants and hard standing
- Sustainability and Energy Strategy to be agreed
- Bin storage and presentation areas to be agreed
- Provision of ecology measures including Hedgehog Fencing.

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

### 11.3 Informatives

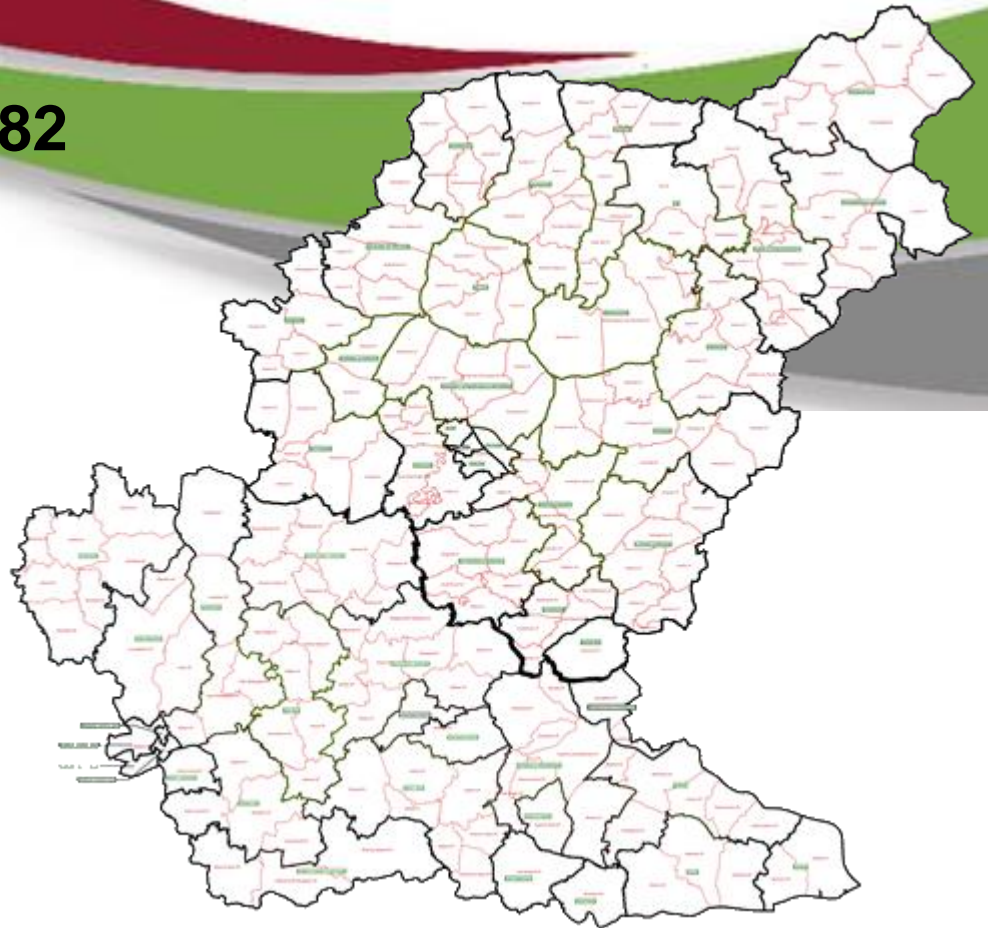
- At Reserved Matters, the landscaping scheme should show significant re-planting to mitigate the loss of two lime trees
- At Reserved Matters, details of the provision for public access to the proposed open space should be provided
- Reference to Land Drainage Act 1991, Water Environment (Water Framework Directive) (England and Wales) Regulations 2003, Section 50 license under the New Roads and Street Works Act.
- Land Contamination advisory note.
- Highway informative

**(4) That in the event of the Planning obligations referred to in Resolution (1) above not being secured within 6 months of the committee resolution that the Acting Chief Planning Officer be authorised to refuse the application on appropriate grounds.**

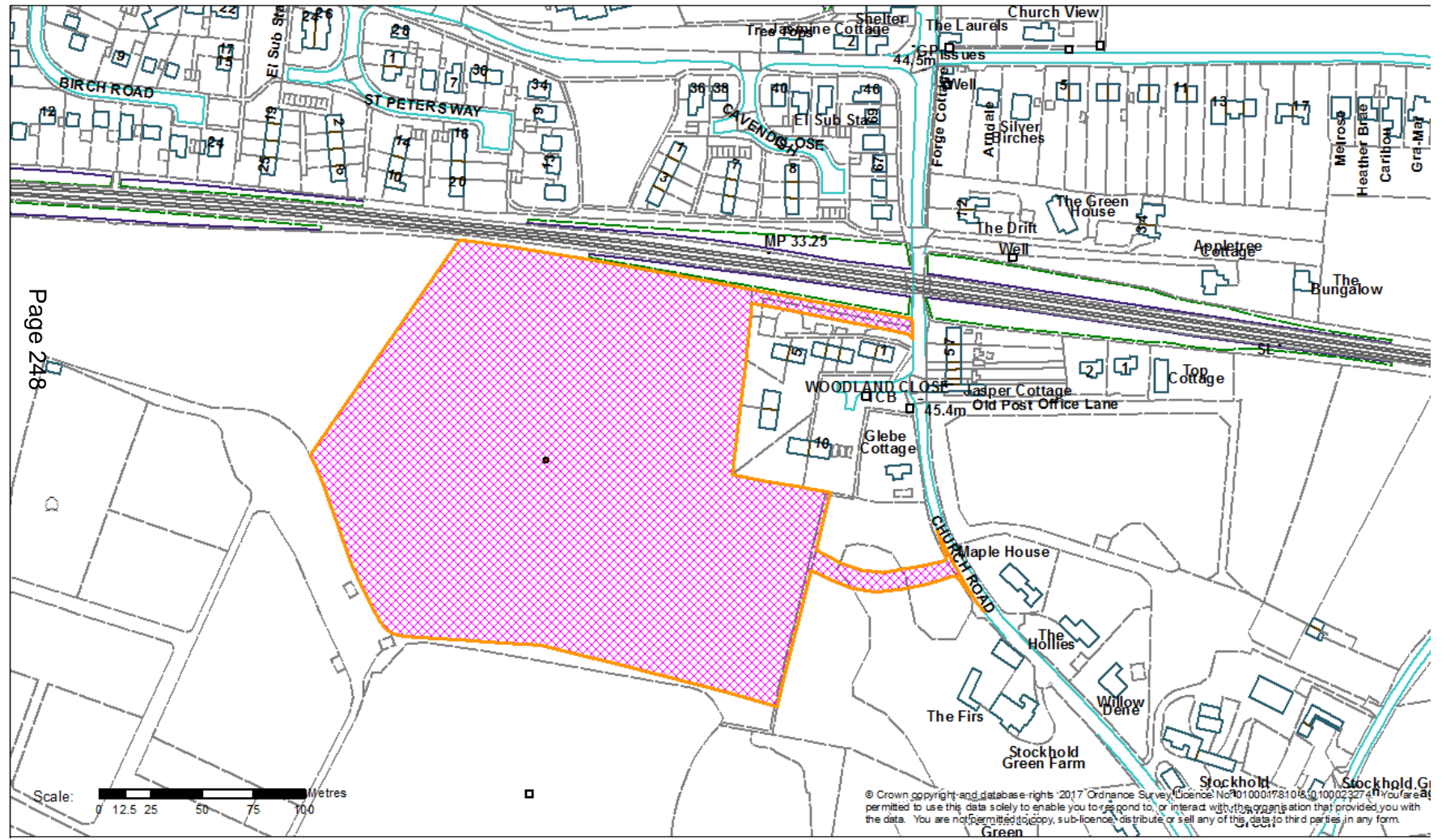
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**Application No: DC/17/02782**

**Address: Land Off Church  
Road, Access Via Garden  
Of 'The Firs'  
Thurston**



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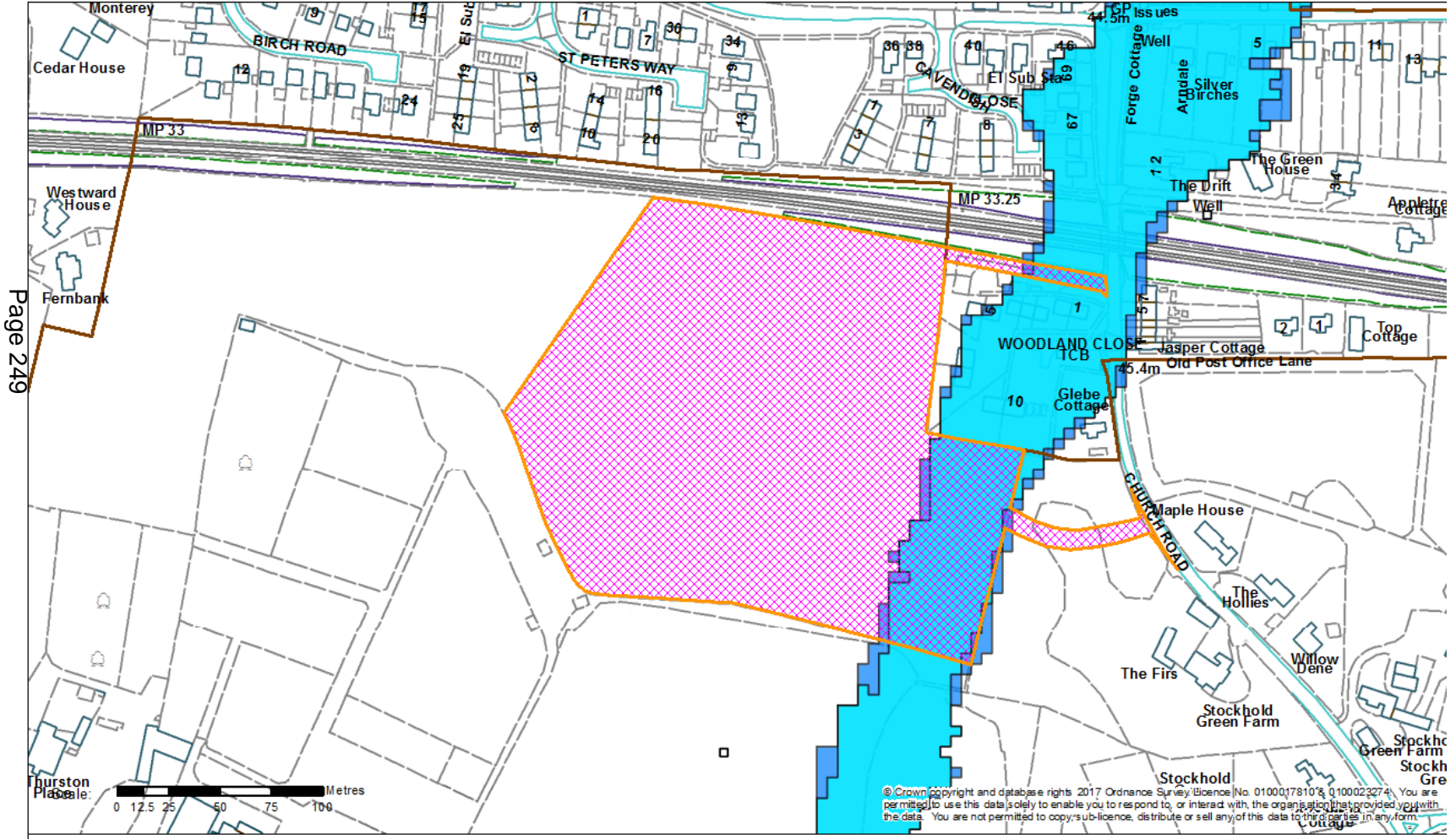
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# Constraints Map

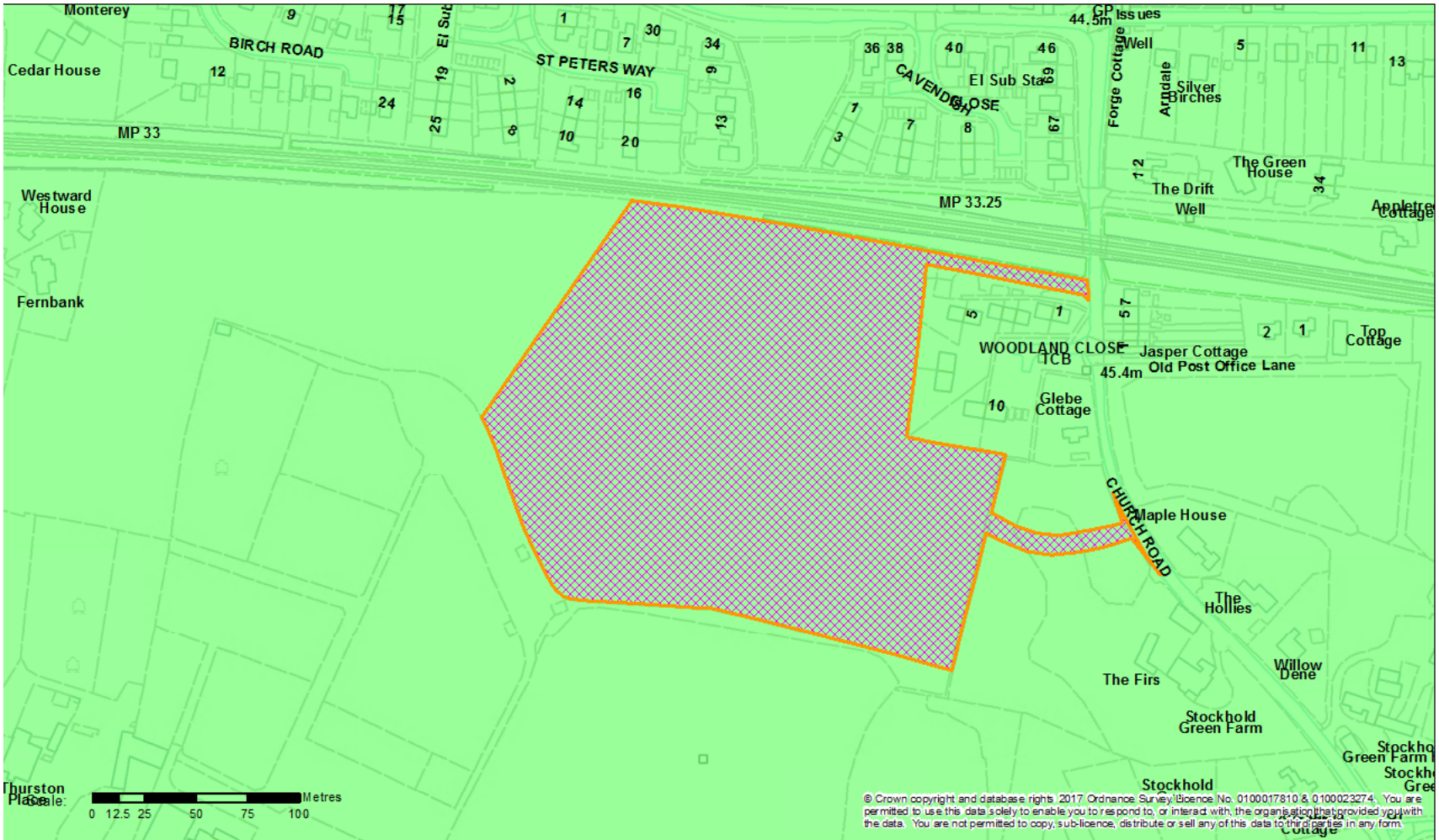
Slide 3

- Flood Zone 2
- Flood Zone 3
- Built Up Area Boundaries



# Constraints Map

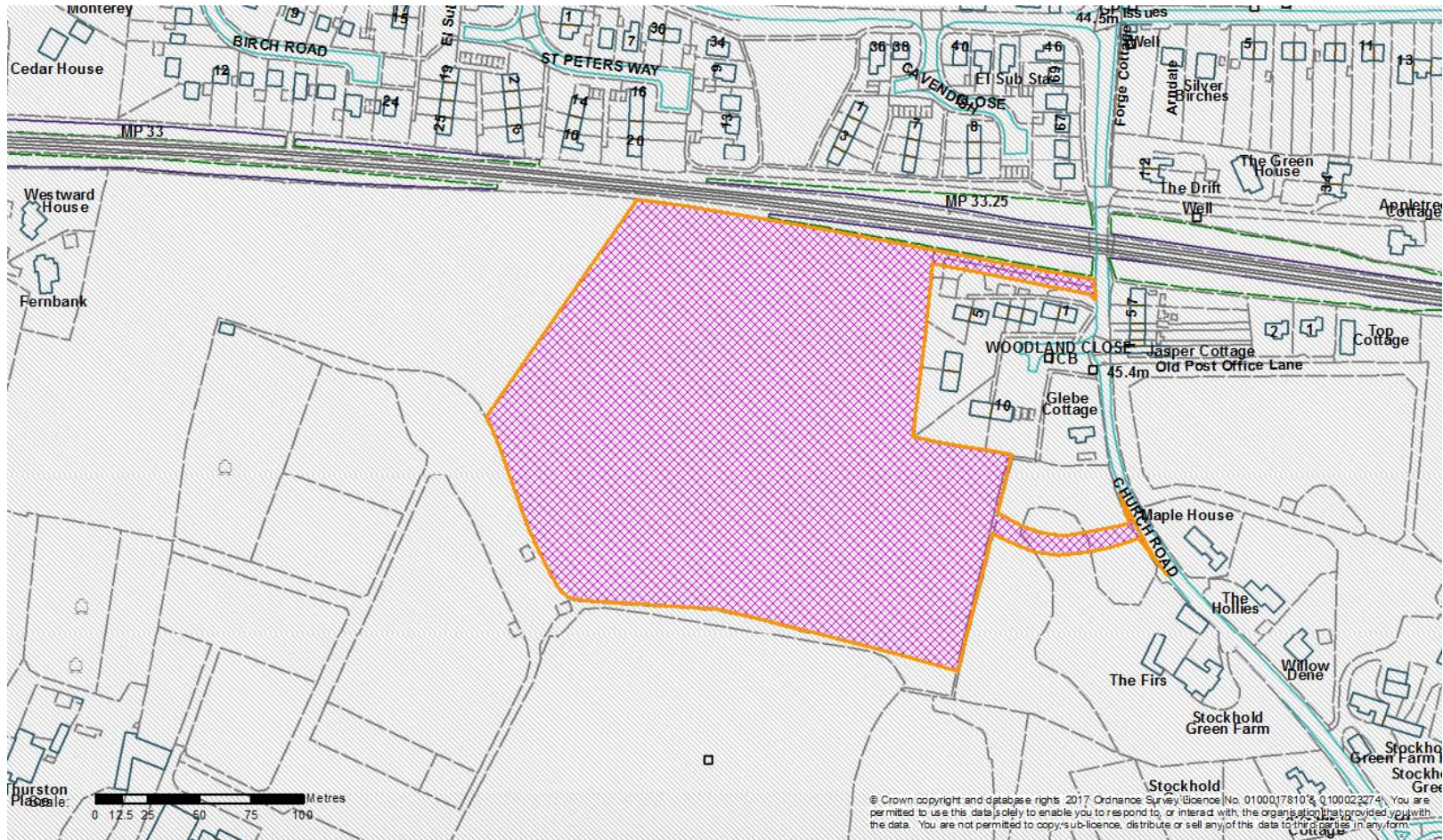
- Agricultural Land provisional
- Grade 1
  - Grade 2
  - Grade 3
  - Grade 4
  - Non-Agricultural
  - Urban





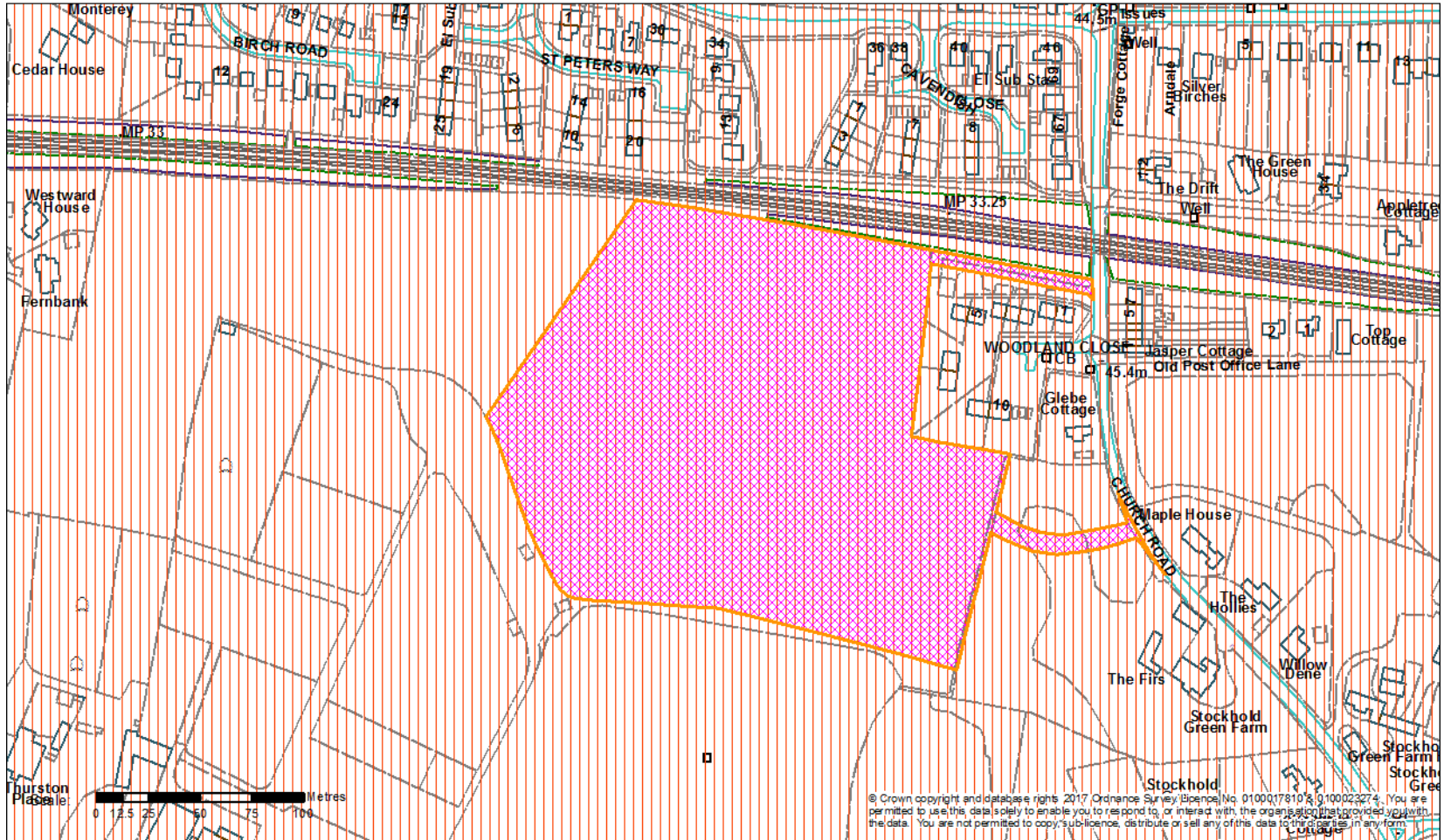
# Constraints Map

## Honiton Safeguarding Area

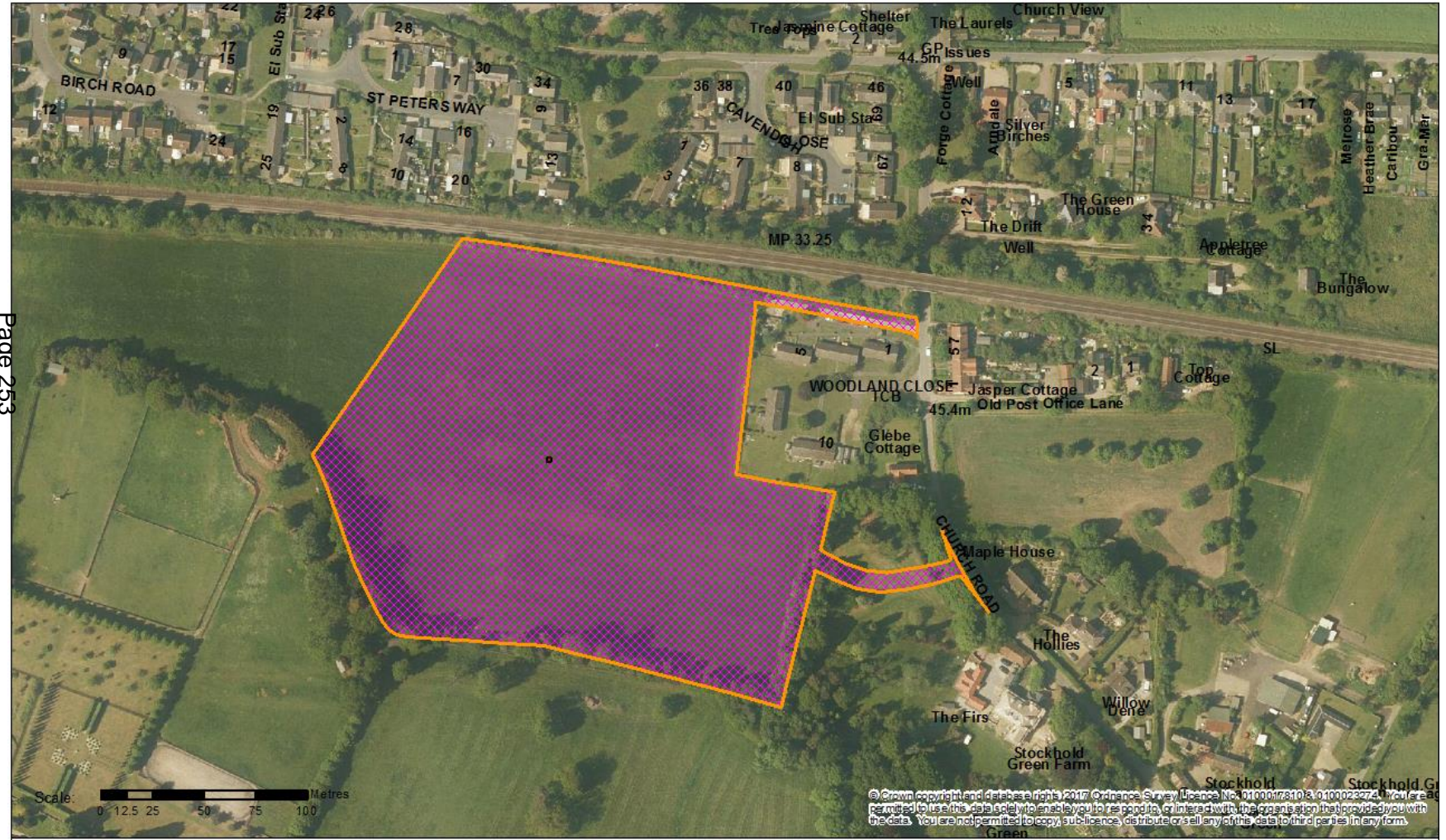


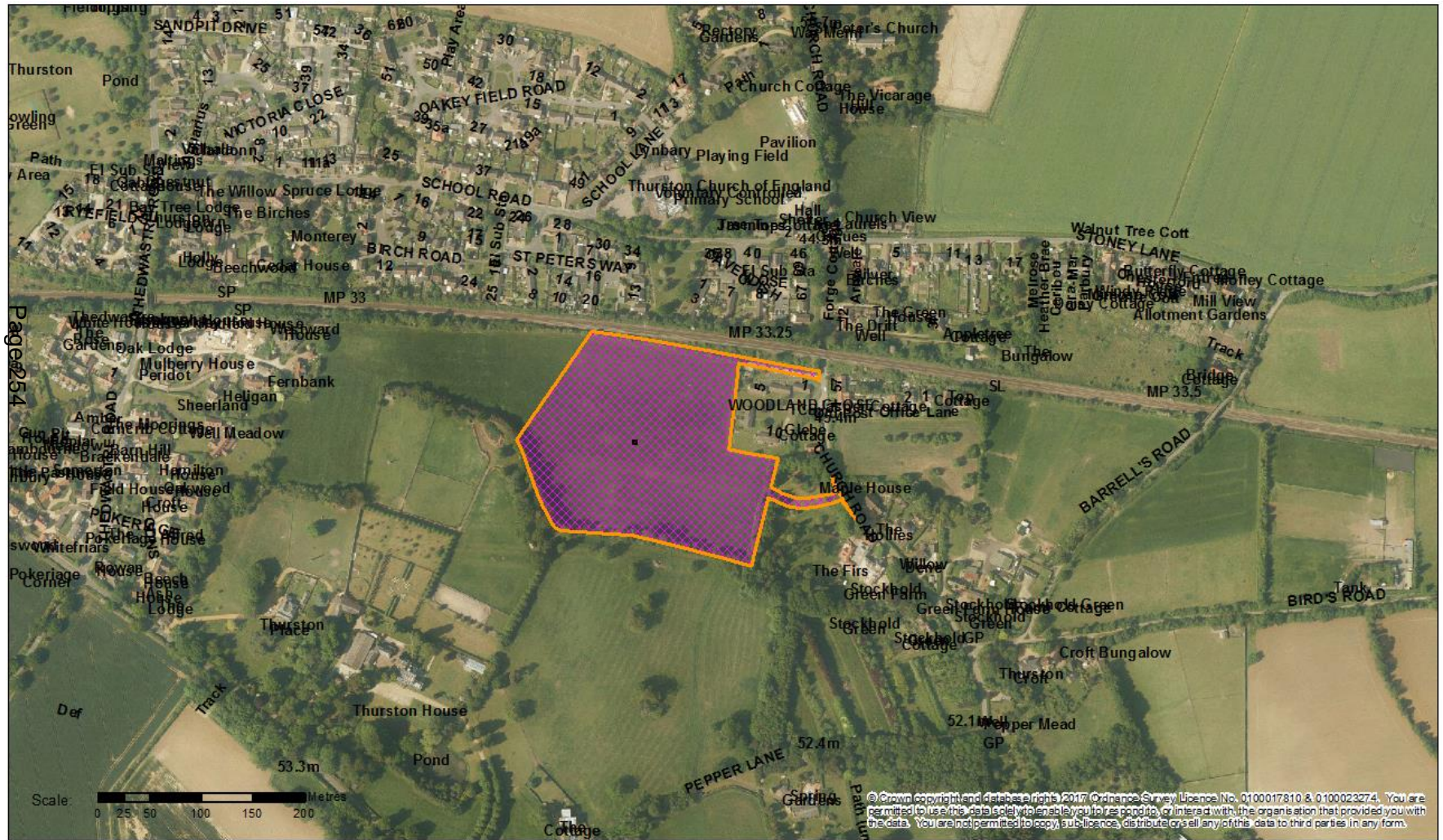
# Constraints Map

 SSSI Impact Risk Zones

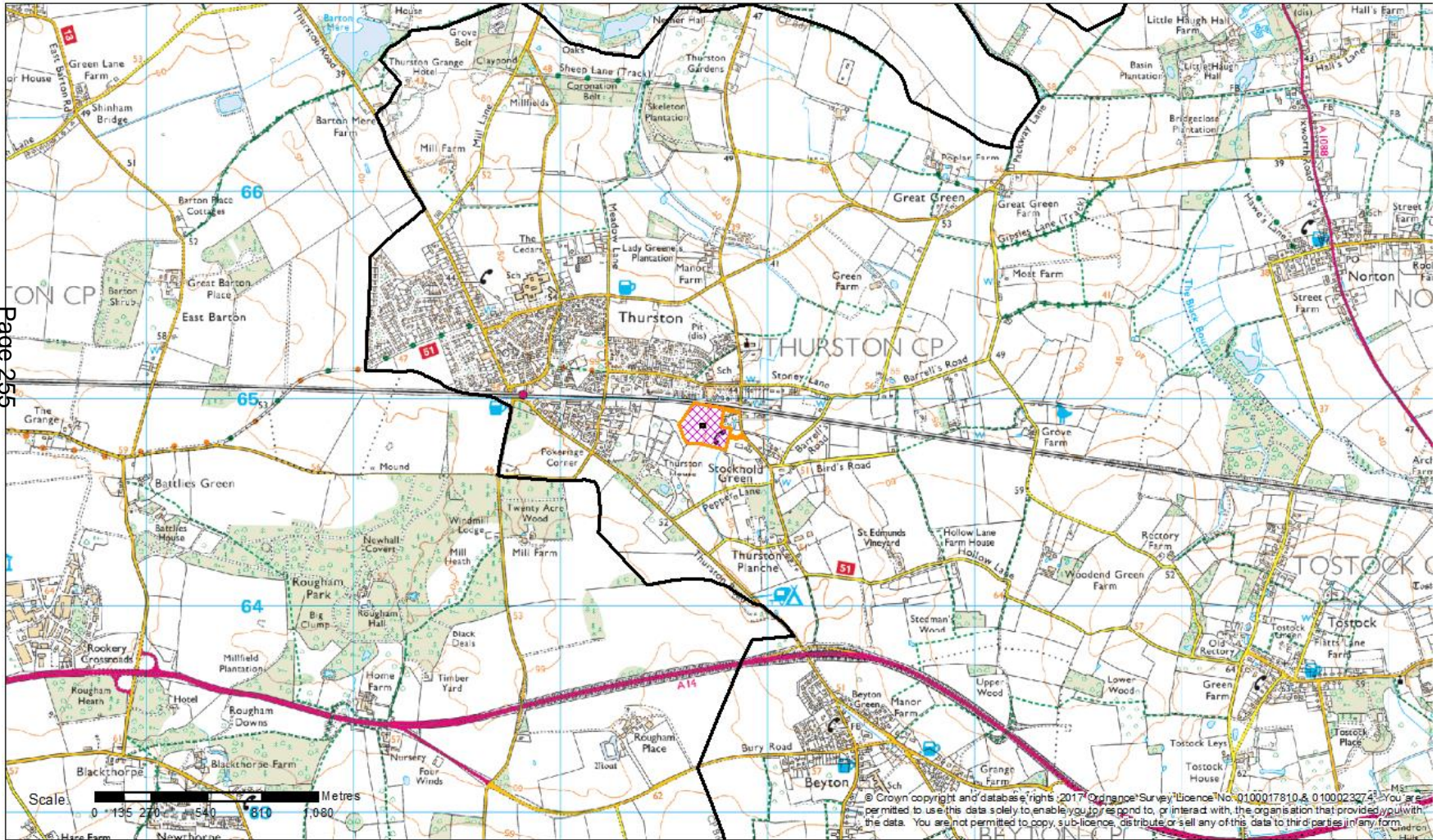


Page 253





Page 054



Page 255

# Site Layout

Page 256



# Proposed Road Alterations plan

Page 257

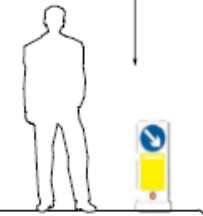


Priority over oncoming vehicles sign.

Existing footpath.

Subject to highway width and verge availability, provision to be made for footway connection below existing railway bridge between the existing concrete access track to Woodland Close and the existing footway on Northern side of the bridge. All to allow enable proposed new footways to connect to existing network.

Keep right bollard on raised kerb.



Proposed footpath with dropped kerb.



Give way to oncoming vehicles sign.

Give way marking applied to road surface.

Existing Footpath

'SLOW' marking applied to road surface.

\* The drawing will design an exception.  
Do not scale from this drawing. Use only signed dimensions. If it is not clear, all dimensions are in the metric system.  
All dimensions are rounded to the nearest millimetre.



Denotes proposed footpaths

<b>PatrickAllen&amp;Associates</b> Architects					
www.patrickallen.co.uk www.patrickallen.co.uk 01473 833333			Design Building Centre Group Four 100/101/102/103		
Possible development site: Land off Church Road, Thurston					
Author: <b>Mr A. Thompson</b>					
Project: <b>Proposed Road Alteration</b>					
Drawing No: <b>3749-06</b>					

# Tree and Landscape Plan

### ARBORICULTURAL REPORT

- CONTENTS:**
1. INTRODUCTION
  2. TREE SURVEY
  3. ARBORICULTURAL IMPLICATIONS & IMPACT ASSESSMENT
  4. TREE PROTECTION

#### 1. INTRODUCTION

**Background:** LSDP were appointed to prepare an Arboricultural Survey & Report to satisfy Local Authority requirements in respect of a proposed new access between Church Road and a proposed development site. The survey information was collected in August 2017.

**Site and Access:** The site runs along the edge of the existing garden curtilage between Church Road and a plot of land currently under development for a single dwelling.

#### 2. TREE SURVEY

**Generally:** Three individual trees and five groups of trees are recorded in the survey, with regard to BS 5837: 2012.; the rationale for the categorisation is outlined below:

- 'B' Category Trees (Trees of moderate quality with an estimated remaining life of expectancy of at least 20 years):**
- G1 Lime: This group comprises mature trees planted as a single row on the northern edge of the site, which have recently been pollarded at 10m height, and a staggered row on the eastern edge, adjacent to Church road. The trees provide screening and enclosure and contribute to the character of the wider landscape; they are accordingly recorded as B2 category.
  - G3 Hedge: This is a bolted and fragmented hawthorn hedge on the western boundary, which is suppressed by neighbouring vegetation. The hedge provides screening and was considered of moderate landscape and/or wildlife value and recorded as B2 category.
  - T2 Oak / T1 Silver Birch: These are mature trees located adjacent to the G3 hedgerow. They contribute to screening and enclosure and were also recorded as B2 category.

- 'C' Category Trees (Trees of low quality with an estimated remaining life of expectancy of at least 10 years, or young trees with a stem diameter below 150mm):**
- G2 Plum: This hedgerow is located within the garden curtilage of 'The Firs', behind mature lime trees. As such it was considered to offer low landscape value and recorded as C2 category.
  - G4 Sycamore: This hedgerow is located on the adjacent side of the ditch to the G3 hedge. It was considered of limited arboricultural, landscape and cultural value and also recorded as C2 category.
  - G5 Conifers / T3 Hornbeam: These comprise plantings of cypress, Scots pine and hornbeam tree within the rear garden and recorded as C2 category (low landscape value).

#### 3. ARBORICULTURAL IMPLICATIONS & IMPACT ASSESSMENT

**Removal of Trees:** Two of the lime trees in the G1 group are proposed to be removed to accommodate the proposed access onto Church Road. The trees in the group are closely planted and it is considered that the remaining trees will maintain the existing mature vegetated appearance of Church Road. It is proposed to plant three lime trees adjacent to the south of the proposed access, to augment the wooded character of the area.

The access will also require the removal of short sections of the G2 and G4 hedges; it is considered this will have no significant impact on the arboricultural value of the site. The proposal includes new native hedge planting to the south of the access drive together with new tree planting (hornbeam). This hedge shall link to G2 and G4 hedges.

**Construction Within RPAs:** Construction of the proposed access to Church Road, will require excavation of parts of the RPA's of adjacent lime trees in G1. This will result in some root loss and has been limited in extent by the proposed footway finishing before it reaches the tree to the north of the access and the use of grass verge, rather than path beyond this and along the south side of the road. It is considered that whilst some root damage will occur, this can be limited by carrying out the works in accordance with an arboricultural method statement and the trees will not be compromised by the works.

#### 4. TREE PROTECTION

**Generally**  
Before any machinery or materials are brought onto site and before any demolition, development or stripping of soil commences, The Root Protection Area (RPA) indicated on the drawing shall be set out and the Protective Barriers and Ground Protection must be installed as shown on the drawing. The Protective Barriers and Ground Protection shall not be removed or altered without prior recommendation by an arboriculturist and approval of the local planning authority.

- The areas protected by barriers and ground protection shall be subject to the following restrictions:
- I. Existing soil levels within the protected areas shall not be altered.
  - II. No excavation of any kind shall take place within the protected areas.
  - III. The protected areas shall not be used for storage of any kind.
  - IV. No vehicles or machinery shall be allowed into the areas protected by barriers.
  - V. Should the developer require the above restrictions to be breached for unforeseen reasons, an appropriate method of works must be agreed with the Local Authority prior to any works taking place within the protected areas.

**Protective Barriers**  
Protective Barriers shall be erected to prevent access into designated areas around retained trees. Once installed, all 'vehicle notices shall be attached to each barrier with words such as: "Construction Exclusion Zone - No Access". Protective Barriers shall be erected in accordance with BS5837: 2012 Fig 2.

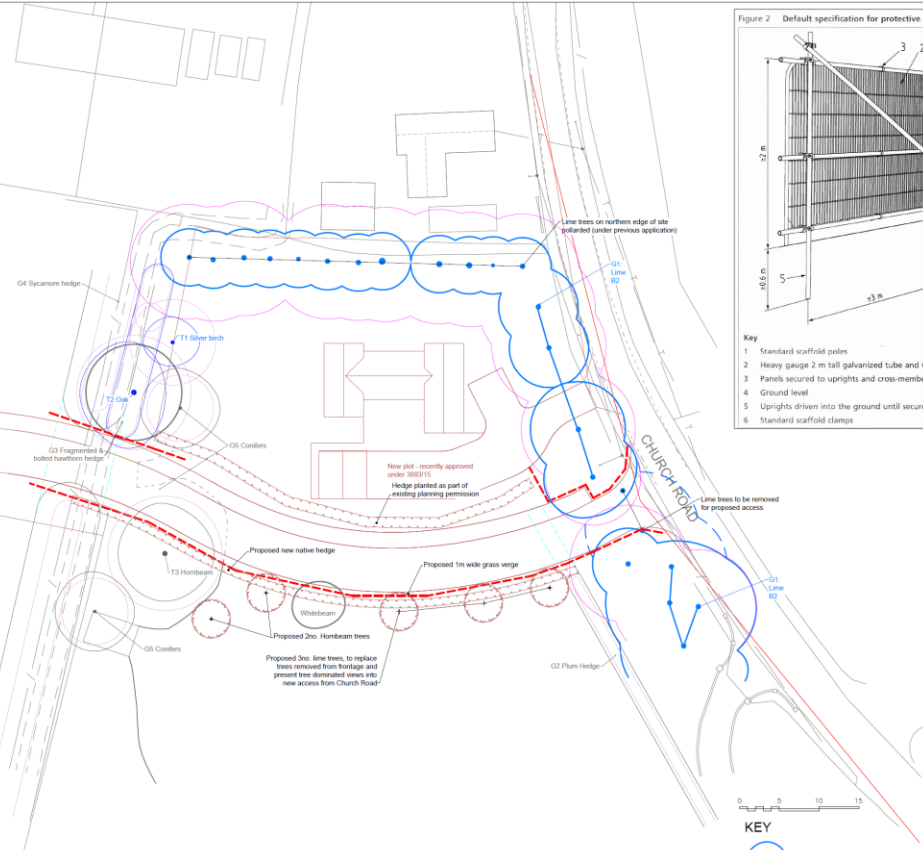
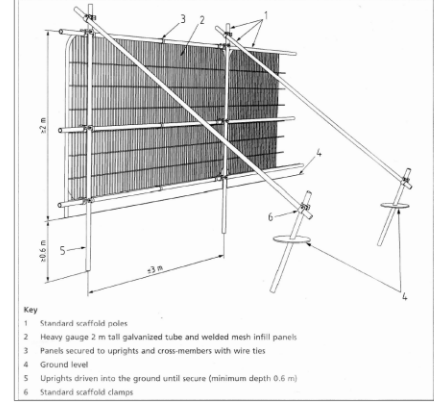


Figure 2 Default specification for protective barrier



KEY

- 1' Category Tree
- Tree proposed to be removed to accommodate proposed access
- 'C' Category Tree
- Root Protection Area (RPA)
- Hedge to be removed to accommodate access
- Proposed Hedge
- Proposed tree
- Tree Protection Barrier: To be webstrich panels installed in accordance with BS 5837: 2012 Fig 2

The original of this drawing was produced in colour - a monochrome copy should not be relied upon.

Ref	Species	Stem Dia (mm)	Can. clear (m)	Br. clear (m)	Age Class	Physiology	Structural Condition	Aesthetic/Cultural Value	Landscape Value	Cultural/Heritage Value	General observations	Useful Life	Grade
T1	Silver birch	450	3	3	N	N	F	L	M	L	Located adjacent to north-west boundary	40+	B2
T2	Oak	600	2	4W	M	N	F	L	M	M	Located adjacent to ditch.	40+	B2
T3	Hornbeam	600	N/A	2E	M	N	F	L	L	L	Located in rear garden. Stem divides at 0.5m height into multiple leaders.	40+	C2
G1	Lime	600	2	N/A	M	N	F	L	M	M	Linear plantation of trees, planted as single row on northern edge of site and staggered row on the eastern edge alongside Church Road	40+	B2
G2	Plum Hedge	50	0	N/A	M	N	F	L	L	L	Located on edge of lawn area	40+	C2
G3	Fragmented & bolted hawthorn hedge	150	0	N/A	M	N	F	L	M	M	Located on eastern side of ditch on west boundary. Eroded and suppressed by neighbouring trees.	40+	B2
G4	Sycamore hedge	150	0	N/A	Y	N	F	L	L	L	Located on western side of ditch on west boundary.	40+	C2
G5	Conifers	350	0	N/A	M	N	F	L	L	L	Includes Leyland / Lawson cypress and Scots pine in rear garden	40+	C2

Revisions:  
A 08.02.19 Proposed hedge / trees added

Land & Sculpture Design Partnership  
LANDSCAPE ARCHITECTURE SCULPTURE ARBORICULTURE

CLIENT: Mr & Mrs A Thompson  
SITE: Proposed New Site Access, Church Road, Thurston  
DRG: Tree Survey & AIA  
DRN BY: GH  
SCALE: 1:250 @ A1  
DATE: August 2017 Rev A  
NO: LS1013-02

OCTAGON HOUSE, THE WATER RUN, HITCHAM, IPSWICH, IP7 7LN  
T: 01488 740723 E: LSDP@london.com



# THURSTON PARISH COUNCIL

Parish Council Office  
New Green Centre  
Thurston  
Suffolk  
IP31 3TG

Tel: 01359 232854

e-mail: [info@thurstonparishcouncil.gov.uk](mailto:info@thurstonparishcouncil.gov.uk)



---

SENT AS AN E-MAIL

Mr. P Isbell  
Corporate Manager – Development Management  
MSDC  
131 High Street  
Needham Market  
IP6 8DL

4<sup>th</sup> August 2017

Dear Mr. Isbell,

**Proposal: Planning Application DC/17/02782 – Outline Planning Application (access to be considered) – erection of 15 dwellings (including 5 affordable bungalows) on land off, Church Road, access via garden of ‘The Firs’, Thurston**

**Case Officer: Dylan Jones**

The Parish Council wishes to place on record that it objects to this proposal in its current guise and that the proposal is considered not to form a sustainable development within the dimensions set out in the NPPF, risks harm to biodiversity and fails to address adequately the economic and social benefits. Furthermore, the Parish Council feels that given the size of the development being proposed, the likely CIL yield for the provision of additional educational facilities and medical facilities will not be able to offset the cumulative effects of this proposal and as such will overburden the existing infrastructure.

The following reasons should be considered and form the basis for the objection:

**Highway Safety:**

The Parish Council feels that there is little or no evidence to suggest that suitable visibility splays can be achieved at this point along Church Road that would ensure vehicles existing the drive would have sufficient visibility to enter the public highway safely nor would it allow vehicles already on the public highway sufficient warning of a vehicle emerging to be able to take avoiding action. As such it feels that the current proposal is detrimental to highway safety as safe and suitable access cannot be achieved by all (National Planning Policy para32-35).

The Parish Council further considers that the application fails to take into account the current road infrastructure and the lack of pedestrian route-ways and cycle ways leading from the site to the amenities and Primary School and Secondary School within the village and as

such would have a negative impact on road safety and therefore a detrimental impact on the amenities enjoyed by the surrounding area vis-à-vis traffic generation (SB2 Development Appropriate to its Setting & T10 Highway Considerations in Development).

Furthermore, the Parish Council considers that as the development has failed to demonstrate that it has given priority to pedestrian and cycle movements and given the location of the site, it would not support the transition to a low carbon future and is therefore unable to meet the environmental dimension of sustainable development and would be contrary to paragraph 17, 30, 35 and 55 of the NPPF and Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review.

This reliance on the private motor car to access amenities and services within and without the village will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeriage Corner, the narrow railway bridge crossings on Barton Road, the Priority System on Thedwastre Road and entry and exit points onto the A14.

#### Site Location:

The site and surrounding area are within the countryside and therefore outside of any settlement boundary for Thurston as defined by Mid Suffolk's Local Plan and would result in the development of new dwellings that would be visually, physically and functionally isolated from the facilities and services offered by Thurston as a Key Service Centre. (Contrary to csfr-fc2 provision and distribution of housing and cor2-CS2 development in the countryside and countryside villages).

#### Landscape Impact:

The Parish Council feels that the application submitted is not sympathetic to the area in which it is situated and fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF. The Parish Council feels that a development of 15 dwellings at this point along Church Road will result in a marked change to the appearance and will diminish the contribution of the large garden area in that locality.

#### Environmental Issues:

The Parish Council feels that the survey on biodiversity submitted with the application is poor and fails to recognise the different species on the site along with their potential habitats. The Parish Council requests that a detailed survey is carried out that identifies all species on the site so that, should permission be granted, conditions can be put in place that will provide biodiversity enhancements and afford some protection to the current species known to be on the site. In its current guise, the Parish Council feels that as the site is part of a Priority Habitat Inventory Area as well as being an area of deciduous woodland, the current proposals will fail to protect the wildlife habitats at this point in the village (contrary to policy CL8 – protecting Wildlife Habitats).

#### Flood Risk:

The Parish Council is concerned of the impact of this development in terms of Flood Risk as the site lies within Flood Zones 2 and 3 which have high probabilities of flooding. Furthermore there is a river which runs along the western border of the proposed site which, from local knowledge, becomes swollen in times of excessive rain and causes flooding in Church Road. The Parish Council is concerned that the run-off from these additional houses will add to this problem and may impact further on Highway Safety.

**Residential Amenity:**

The Parish Council considers that this application will have a negative impact on the residential amenities enjoyed by the occupiers of neighbouring properties (Contrary to NPPF paragraphs 17 and 56). In considering the application the Parish Council felt that the siting of several the dwellings would overlook the bungalows at Woodlands Close and would impact the quiet enjoyment of those living in Woodlands Close.

The Parish Council wishes to request that, given the scale of proposed housing development currently facing the village of Thurston, this application be included within the cohesive approach that looks at the totality of the applications submitted and their impact on all of Thurston's infrastructure and social development.

Whilst it is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, there is still the very real concern that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

**Yours sincerely,**

*Victoria S Waples*

**V. S. Waples, BA(Hons), CiLCA  
Clerk to the Council**



**From:** Nathan Pittam  
**Sent:** 07 July 2017 09:52  
**To:** X Delete Aug 17 - Planning Emails  
**Subject:** DC/17/02782. EH - Land Contamination.

**EP Reference : 196158**  
**DC/17/02782. EH - Land Contamination.**  
**Land West Of, Church Road, Thurston, BURY ST EDMUNDS, Suffolk.**  
**Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston: Outline**  
**Planning Application (Access to be considered)- Erection of 15 dwellings**  
**(including 5 affordable bungalows).**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has failed to submit the required land contamination assessments. For a development of this scale we require the applicant to submit a full BS10175 compliant phase I investigation. Without this information I would be minded to recommend that the application be refused on the grounds of insufficient information to demonstrate the suitability of the site for the proposed end use.

Regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
Work: 01449 724715  
Mobile:: 07769 566988  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Chief Planning Control Officer For the attention of: Mark Russell

FROM: Nathan Pittam, Environmental Protection Team DATE: 26.2.19

YOUR REF: DC/17/02782

SUBJECT: Outline Planning Application (Access to be considered)- Erection of 15 dwellings (including 5 affordable bungalows).

Address: Land West Of, Church Road, Thurston, BURY ST EDMUNDS, Suffolk.

---

**Please find below my comments regarding contaminated land matters only.**

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

**Proposed Condition: Standard Contaminated Land Condition (CL01)**

*No development shall take place until:*

- 1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
- 2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
- 3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
- 4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

*Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.*

**It is important that the following advisory comments are included in any notes accompanying the Decision Notice:**

*“There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.*

*Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.*

*The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:*

- *Local Planning Authority*
- *Environmental Services*
- *Building Inspector*
- *Environment Agency*

*Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.*

*The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team.”*

Nathan Pittam  
Senior Environmental Management Officer

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

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FROM: Nathan Pittam, Environmental Protection Team DATE: 26.2.19

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- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

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- *Building Inspector*
- *Environment Agency*

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*The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team.”*

Nathan Pittam  
Senior Environmental Management Officer



**From:** Philippa Stroud  
**Sent:** 15 August 2017 11:49  
**To:** BMSDC Planning Mailbox  
**Cc:** Dylan Jones  
**Subject:** DC/17/02782 Land off Church Rd, Access via Garden of The Firs, Thurston - Other Issues

WK/196160

**APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/17/02782**

**EH - Noise/Odour/Light/Smoke**

**Proposal:** Outline Planning Application (Access to be considered)- Erection of 15 dwellings (including 5 affordable bungalows)

**Location:** Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston

Thank you for the opportunity to comment on the above planning application.

I have no objection, in principle, to the proposed development. I recommend, however, that a planning condition is attached which restricts the hours of noise intrusive work during construction of the development to:

Monday to Friday between 08:00 hrs and 18:00 hrs

Saturday between 09:00 hrs and 13:00 hrs

No work to be undertaken on a Sunday, Bank or Public Holiday.

The above should apply to deliveries too.

Reason – To minimise detriment to nearby residential amenity.

Regards,

Philippa Stroud  
Senior Environmental Protection Officer  
**Babergh and Mid Suffolk District Councils - Working Together**

Telephone: 01449 724724

Email: [Philippa.Stroud@babermidsuffolk.gov.uk](mailto:Philippa.Stroud@babermidsuffolk.gov.uk)

Websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:**RM Floods Planning  
**Sent:**8 May 2018 13:25:47 +0100  
**To:**BMSDC Planning Area Team Yellow  
**Cc:**Gemma Walker  
**Subject:**2018-05-08 JS Reply Land Off, Church Road, Access Via Garden Of 'The Firs', Thurston Ref DC/17/02782

Dear Gemma Walker,

**Subject: Land Off, Church Road, Access Via Garden Of 'The Firs', Thurston Ref DC/17/02782**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/17/02782

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Drainage Assessment Ref 341/2016/DA
- Site Location Plan Ref 3749-01A

**Note: Suffolk County Council, as the LLFA have only been consulted on this application since the 3<sup>rd</sup> May 2018**

The reason why we are recommending a holding objection is because the applicant has failed to follow the NPPG hierarchy for the disposal of surface water, by conducting infiltration tests and that they have not provided evidence that they have riparian rights to discharge into the watercourse.

The points below detail the action required in order to overcome our current objection:-

1. Submit infiltration test results to BRE Digest 365, then if results are less than 5-10mm/hr, submit;

- a. evidence that the watercourse that they propose to discharge into flows into a OS mapped watercourse
  - b. evidence that the applicant has a riparian right to discharge into the watercourse
2. Provide a indicative surface water drainage plan showing how the water will be conveyed, stored and infiltrated or discharge to the watercourse
3. Amend the drainage strategy para 3.11 regarding historical flood events, to include flooding south of the railway line along Church Rd

Kind Regards

Jason Skilton

Flood & Water Engineer, Flood & Water Management

Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Rd, Ipswich, Suffolk IP1 2BX

Telephone: 01473 260411

Email: [jason.skilton@suffolk.gov.uk](mailto:jason.skilton@suffolk.gov.uk)

Website: [www.suffolk.gov.uk](http://www.suffolk.gov.uk)

-----Original Message-----

From: [planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk) <[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)>

Sent: 03 May 2018 10:41

To: RM Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/17/02782

Please find attached planning consultation request letter relating to planning application - DC/17/02782  
- Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston

Kind Regards

**From:** RM Floods Planning  
**Sent:** 10 December 2018 09:19  
**To:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>  
**Cc:** Mark Russell <Mark.Russell@babberghmidsuffolk.gov.uk>  
**Subject:** 2018-12-10 JS reply Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston Ref DC/17/02782

Dear Mark Russell.

**Subject: Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston Ref DC/17/02782**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/17/02782

The following submitted documents have been reviewed and we recommend **maintaining our holding objection:**

- Drainage Assessment Ref 341/2016/DA
- Drainage Assessment Addendum Ref 341/2016/DS P2
- Site Location Plan Ref 3749-01A

**Note: Suffolk County Council, as the LLFA have only been consulted on this application since the 3rd May 2018**

The reason why we are recommending a holding objection is because whilst we are content that the applicant has a viable method for the disposal of surface water utilising infiltration, we note that the Environment Agency (EA) still has an objection to this proposal on the ground that an insufficient flood risk assessment has been undertaken with regard to the site being within a flood zone 2 and 3.

The points below detail the action required in order to overcome our current objection:-

1. Demonstrate how the site has a vehicular access to allow the emergency services to safely reach the development during a fluvial flooding event
2. Provide a flood risk assessment that removes the EA objection or a consultation reply removing their objection.

Whilst not a point of objection, we also advise you that the proposed infiltration trench/swale offers little or no biodiversity or amenity value.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Flood & Water Management  
Growth, Highways & Infrastructure

Suffolk County Council | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX  
T: 01473 260411 | <https://www.suffolk.gov.uk/planning-waste-and-environment/flooding-and-drainage/>

\*\*\*Appendix A to the Suffolk Flood Risk Management Strategy has been updated! If you're involved in the planning, design and construction of new developments this may be of interest to you. You

will be expected to comply with this new local guidance. More information can be found here;  
[https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/\\*\\*](https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/**)

-----Original Message-----

From: [planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk) <[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)>

Sent: 05 December 2018 11:13

To: RM Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

Subject: MSDC Planning Re-consultation Request - DC/17/02782

Please find attached planning re-consultation request letter relating to planning application - DC/17/02782 - Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested. For more information on how we do this and your rights in regards to your personal information and how t

**From:** RM Floods Planning  
**Sent:** 22 October 2018 08:45  
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Cc:** Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>  
**Subject:** 2018-10-22 JS reply Land Off, Church Road, Access Via Garden Of 'The Firs', Thurston Ref DC/17/02782

Dear Gemma Walker,

**Subject: Land Off, Church Road, Access Via Garden Of 'The Firs', Thurston Ref DC/17/02782**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/17/02782

The following submitted documents have been reviewed and we recommend **maintaining our holding objection:**

- Drainage Assessment Ref 341/2016/DA
- Drainage Assessment Addendum Ref 341/2016/DS
- Site Location Plan Ref 3749-01A

**Note: Suffolk County Council, as the LLFA have only been consulted on this application since the 3rd May 2018**

The reason why we are recommending a holding objection is because whilst we are content that the applicant has a viable method for the disposal of surface water utilising infiltration, there seems to be some discrepancies between the layout in the drainage assessment/addendum and the proposed site layout drawing. We also note that the Environment Agency (EA) still has an objection to this proposal on the ground that an insufficient flood risk assessment has been undertaken with regard to the site being within a flood zone 2 and 3.

The points below detail the action required in order to overcome our current objection:-

1. Submit a proposed layout plan demonstrating that the part of the site within flood zone **3** will not be utilised for:-
  - a. Siting of any dwellings
  - b. Siting of any surface water drainage attenuation basin
2. Submit a proposed indicative surface water drainage plan showing plot soakaways rather than shared plot soakaways or one large attenuation basin
3. Demonstrate how the site has a vehicular access to allow the emergency services to safely reach the development during a fluvial flooding event
4. Provide a flood risk assessment that removes the EA objection

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Flood & Water Management  
Growth, Highways & Infrastructure

Dear Mark Russell,

Subject: Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston Ref DC/17/02782

Suffolk County Council, Flood and Water Management have reviewed application ref DC/17/02782.

We have reviewed the following submitted documents and we recommend approval of this application subject to conditions:

- Drainage Assessment Ref 341/2016/DA
- Drainage Assessment Addendum Ref 341/2016/DS P2
- Site Location Plan Ref 3749-01A
- Consultation Reply from Environment Agency ref AE/2017/121806/02-L01

Note: Suffolk County Council, as the LLFA have only been consulted on this application since the 3rd May 2018.

We propose the following condition in relation to surface water drainage for this application.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
  - a. Dimensioned plans and drawings of the surface water drainage scheme;
  - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
  - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to  $Q_{bar}$  or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
  - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
  - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;

f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

2. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

3. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

4. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:

a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-

i. Temporary drainage systems

ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses

iii. Measures for managing any on or offsite flood risk associated with construction



Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan

#### Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act

Note: Whilst not a point of objection, we also advise you that the proposed infiltration trench/swale offers little or no biodiversity or amenity value.

Kind Regards

Jason Skilton

Flood & Water Engineer

Flood & Water Management

Growth, Highways & Infrastructure

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/17/02782 adj The Firs, Thurston	
<b>2</b>	<b>Date of Response</b>	19.7.17	
<b>3</b>	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
<b>4</b>	<b>Summary and Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> <li>• no harm to a designated heritage asset because the site makes little contribution to the setting of nearby listed buildings, and the proposal would have no material impact.</li> </ul>	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>The site is close to a number of listed building but with the exception of Thurston House and Pepper Cottage, the settings of these buildings is characterised and compromised by development of the 1900s, and it is considered that the proposal's impact would be neutral in respect of the setting of these buildings.</p> <p>Pepper Cottage is a fairly substantial house, seriously damaged by fire some years ago but now repaired. Beyond its garden it sits in rural surroundings, and it may have historic association with farmland around it.</p> <p>Thurston House is a sizeable house of some architectural quality, dating from the middle of the 1700s with alterations and additions in the 1800s. It still enjoys extensive grounds, surviving from a landscaped park. The grounds are bounded to the north by a belt of trees which meanders along the edge of the application site. To the south west the listed house is set well back from the road, but its access faces open fields.</p> <p>The application site is part of the wider rural setting of Thurston House, but appears to have little association with the listed house, and the tree belt forms a significant boundary. For these reasons the site is considered to make little contribution to the setting of Thurston House. The same reasons apply to Pepper Cottage.</p> <p>The proposal would introduce built development in place</p>	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

		of open farmland, and would potentially affect the setting of nearby listed buildings. But for the reasons given above the proposal is considered to have no material impact on the setting or significance of these two listed buildings.
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	<b>Recommended conditions</b>	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.



Mark Russell  
Mid Suffolk District Council  
Planning Department  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2017/121806/02-L01  
**Your ref:** DC/17/02782  
**Date:** 21 December 2018

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS TO BE CONSIDERED)-  
ERECTION OF 15 DWELLINGS (INCLUDING 5 AFFORDABLE BUNGALOWS)  
LAND OFF CHURCH ROAD ACCESS VIA GARDEN OF 'THE FIRS' THURSTON**

Thank you for your re-consultation dated 7 December 2018. We have reviewed the additional information submitted on 7 December 2018 and are removing our flood risk holding objection. We have no objections based on the assumption that you deem the site to have passed the sequential test. We have included advice in the flood risk section below.

**Flood Risk**

We have reviewed the submitted Drainage Assessment Addendum from fluvial flood risk sources only. The applicant has included details of the proposed surface water drainage for the site and the surface water drainage proposals should be assessed by the Lead Local Flood Authority, Cambridgeshire County Council.

The site is situated in flood zones 1, 2 and 3 as shown on the Environment Agency's flood map. The submitted Drainage Assessment Addendum by G.H. Bullard & Associates LLP dated November 2018 demonstrates that all residential development will be located within flood zone 1. We are pleased that a sequential approach to the site has been taken and therefore have no objections to the proposed outline development.

Should the site layout change which results in development being proposed within flood zones 2 and 3 we wish to be reconsulted.

## **Advice to LPA**

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. We recommend that due consideration by the Local Planning Authority is given to the area of safe access and egress in the event of flooding. The only road in and out of the development is situated in Flood Zone 3. However, the FRA has stated that there is an alternative safe means of access available which is to the South towards Pepper Lane.

We would also recommend that a flood evacuation plan is created for this development, which should include an appropriate method of flood warning and evacuation, to ensure the safe use of the development in extreme circumstances.

We trust this advice is useful.

Yours sincerely

**Mr Liam Robson**  
**Sustainable Places - Planning Advisor**

Direct dial 020 8474 8923

Direct e-mail [Liam.Robson@environment-agency.gov.uk](mailto:Liam.Robson@environment-agency.gov.uk)

cc Patrick Allen Ltd

D Jones  
Mid Suffolk District Council  
Planning Department  
131, Council Offices High Street  
Needham Market  
Ipswich  
IP6 8DL

**Our ref:** AE/2017/121806/01-L01  
**Your ref:** DC/17/02782  
**Date:** 24 July 2017

Dear Mr Jones

**OUTLINE PLANNING APPLICATION (ACCESS TO BE CONSIDERED) -  
ERECTION OF 15 DWELLINGS (INCLUDING 5 AFFORDABLE BUNGALOWS)  
LAND OFF CHURCH ROAD ACCESS VIA GARDEN OF 'THE FIRS' THURSTON**

Thank you for consulting us on this application which we received on 6 July 2017. We have reviewed the application and are submitting a holding objection on the grounds of flood risk.

**Flood risk**

The application site lies partially within Flood Zone 3 defined by the Environment Agency Flood Map as having a high probability of flooding. The site is also shown to be within Flood Zone 3b according to Mid Suffolk District Council's Strategic Flood Risk Assessment.

In the absence of a flood risk assessment (FRA), we object to this application and recommend refusal of planning permission until a satisfactory FRA has been submitted.

An FRA is vital if the local planning authority is to make informed planning decisions. In the absence of an FRA, the flood risk resulting from the proposed development are unknown. The absence of an FRA is therefore sufficient reason in itself for a refusal of planning permission.

It appears that a sequential approach to the site has been taken, locating all development in Flood Zone 1. However, this should be confirmed in a FRA which takes into account all sources of flood risk and detail any proposed flood risk mitigation measures. It should also show how safe access and egress is going to be achieved.

## Overcoming our objection

The applicant can overcome our objection by undertaking an FRA which demonstrates that the development is safe without increasing risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

The Flood Zone maps in this area are formed of national generalised modelling, which was used in 2004 to create fluvial floodplain maps on a national scale. This modelling was improved more recently, using a more detailed terrain model for the area. This modelling is not a detailed local assessment, it is used to give an indication of areas at risk from flooding.

JFLOW outputs are not suitable for detailed decision making. Normally, in these circumstances, an FRA will need to undertake a modelling exercise in order to derive flood levels and extents, both with and without allowances for climate change, for the watercourse, in order to inform the design for the site. Without this information, the risk to the development from fluvial flooding associated with the ordinary watercourse is unknown.

In order to have fully considered all forms of flooding and their influence on the site, it will be necessary to identify the fluvial flood risk. Fluvial flood levels will be required for the watercourse. It may be appropriate to undertake some flow analysis and basic modelling such as FEH to establish the level. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk. It may be that the culverting may in itself provide mitigation.

We advise that modelling should be undertaken to accurately establish the risk to the proposed development in terms of potential depths and locations of flooding. The watercourse should be modelled in a range of return period events, including the 1 in 20, 1 in 100 and 1 in 1000 year events, both with and without the addition of climate change. The flood levels on the development site should be determined and compared to a topographic site survey to determine the flood depths and extents across the site.

Please refer to the attached documents:

- OI 379\_05 Computational modelling to assess flood and coastal risk
- Flood Estimation Guidelines
- 'Using Computer River Modelling as Part of a Flood Risk Assessment - Best Practice Guidance' for further advice regarding modelling submissions.

We acknowledge that some of the documents above refer to outdated planning policy. However, the technical guidance and our requirements regarding computer modelling remain relevant.

We would recommend that FRAs at all levels should be undertaken under the supervision of an experienced flood risk management specialist (who would normally be expected to have achieved chartered status with a relevant professional body such as the Institution of Civil Engineers (ICE) or the Chartered Institution of Water and Environmental Management (CIWEM)). Environmental consultants and suppliers can be found from the following directory: <https://www.endsdirectory.com/>

Paragraph 103 of the NPPF states:-

“When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- Within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
- Development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.”

Some areas of land within the site are likely to be subject to a higher risk of flooding than other areas within the site and an understanding of the susceptibility/vulnerability of land to flooding should be delivered through flood modelling and risk assessment in order to influence the layout of housing areas to avoid siting housing on areas of land that are susceptible to higher chances of flooding. This will allow a sequential “risk-based” approach to be applied to development within the site as directed by the National Planning Policy Framework.

From the submitted site plan drawing number 3749-05C, it appears that the surface water attenuation pond is situated in Flood Zone 3. The Lead Local Flood Authority (LLFA), Suffolk County Council, lead on surface water drainage matters, however we have the following comments which may be of assistance. All Surface Water attenuation should be outside of the 1 in 100 climate change flood extent to ensure the work effectively and have sufficient capacity to deal with design rainfall events. Full details should be submitted. We recommend you consult the LLFA to obtain guidance on what is and isn't acceptable.

Yours sincerely

**Mr GRAHAM STEEL**  
**Sustainable Places - Planning Advisor**

Direct dial 02 03 02 58389

Direct e-mail [graham.steel@environment-agency.gov.uk](mailto:graham.steel@environment-agency.gov.uk)

cc Patrick Allen Ltd

End





## Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00023087
Local Planning Authority:	Mid Suffolk District
Site:	Land Off Church Road Access Via Garden Of 'The Firs' Thurston, Thurston
Proposal:	Outline Planning Application (Access to be considered)- Erection of 15 dwellings (including 5 affordable bungalows)
Planning Application:	DC/17/02782

**Prepared by:** Pre-Development Team

**Date:** 24 August 2017

If you would like to discuss any of the points in this document please contact me on 0345 0265 458 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

## **ASSETS**

### **Section 1 – Assets Affected**

- 1.1 There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

*"Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."*

- 1.2 The development site is within 15 metres of a sewage pumping station. This asset requires access for maintenance and will have sewerage infrastructure leading to it. For practical reasons therefore it cannot be easily relocated.

Anglian Water consider that dwellings located within 15 metres of the pumping station would place them at risk of nuisance in the form of noise, odour or the general disruption from maintenance work caused by the normal operation of the pumping station.

The site layout should take this into account and accommodate this infrastructure type through a necessary cordon sanitaire, through public space or highway infrastructure to ensure that no development within 15 metres from the boundary of a sewage pumping station if the development is potentially sensitive to noise or other disturbance or to ensure future amenity issues are not created.

## **WASTEWATER SERVICES**

### **Section 2 – Wastewater Treatment**

- 2.1 The foul drainage from this development is in the catchment of Thurston Water Recycling Centre that will have available capacity for these flows.

### **Section 3 – Foul Sewerage Network**

- 3.1 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

## Section 4 – Surface Water Disposal

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).

We request a condition requiring a drainage strategy covering the issue(s) to be agreed.

## Section 5 – Trade Effluent

- 5.1 Not applicable

## Section 6 – Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

### Surface Water Disposal (Section 4)

#### **CONDITION**

*No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy so approved unless otherwise agreed in writing by the Local Planning Authority.*

#### **REASON**

*To prevent environmental and amenity problems arising from flooding.*

**From:**Martin Egan  
**Sent:**26 Sep 2017 11:01:13 +0100  
**To:**Dylan Jones;Ben Elvin  
**Cc:**BMSDC Planning Area Team Yellow  
**Subject:**FW: Planning Re-consultation Request - DC/17/02782  
**Attachments:**ufm6.pdf

Hello Ben,

I refer to this reconsultation. Whilst the applicant has included an additional note regarding road widening (my original comment 1) there is nothing to show the required section of footway under the nearby rail bridge. This needs to extend between the existing footway at Woodland Close to the existing footway beyond the bridge.

In my opinion both the road widening and the section of footway should be shown on a drawing as the application wants "access" to be considered. I take this to be vehicular and pedestrian access. Unfortunately the only drawing submitted is at small scale so it would be difficult to clearly illustrate both items clearly without a clearer drawing.

Do you agree with this interpretation? Let me know what you think.

Thanks,

Martin Egan,

Highways Development Management Engineer,

Strategic Development,

Resource Management,

Suffolk County Council,

Endeavour House,

8 Russell Road, Ipswich,

IP1 2BX,

[martin.egan@suffolk.gov.uk](mailto:martin.egan@suffolk.gov.uk)

[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

**From:** RM Highways Development Control

**Sent:** 25 September 2017 16:58

**To:** Martin Egan <[Martin.Egan@suffolk.gov.uk](mailto:Martin.Egan@suffolk.gov.uk)>

**Subject:** FW: Planning Re-consultation Request - DC/17/02782

Hi Martin

Information added to Atrium.

Con Ref: 570\CON\3522\17


Regards,

*Shirley*

**Shirley Brown**

**Technical Support Officer**

Strategic Development

 01473 265068

-----Original Message-----

From: [planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)

[<mailto:planningyellow@baberghmidsuffolk.gov.uk>]

Sent: 21 September 2017 14:45

To: RM Highways Development Control <[Highways.DevelopmentControl@suffolk.gov.uk](mailto:Highways.DevelopmentControl@suffolk.gov.uk)>

Subject: Planning Re-consultation Request - DC/17/02782

Please find attached planning re-consultation request letter relating to planning application - DC/17/02782 - Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

**From:**David Pizzev  
**Sent:**21 Jul 2017 09:36:10 +0100  
**To:**Dylan Jones  
**Subject:**17/02232 - Church Road, Thurston

Hi Dylan

It's not clear on the plan but I cannot see how an access in this location can be achieved without the loss of important mature roadside trees and therefore I cannot support the application at this stage.

David

**David Pizzev**  
Arboricultural Officer

Hadleigh office: 01473 826662

Needham Market office: 01449 724555

david.pizzev@baberghmidsuffolk.gov.uk  
[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Babergh and Mid Suffolk District Councils - Working Together

**From:** Dylan Jones  
**Sent:** 20 July 2017 12:18  
**To:** David Pizzev  
**Subject:** RE: Application DC/17/02232 - Church Road, Thurston

Sorry, I meant 02782 which is Church Road in Thurston for 15 houses.

**Dylan Jones**

**Consultant Senior Development Management Officer**

**01449 724537**

**Babergh and Mid Suffolk District Councils – Working Together**

**(Please note I work Mondays to Thursdays only)**

Web: [www.babergh.gov.uk](http://www.babergh.gov.uk) or [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**Important Update Regarding Planning Service:**

Our new joint planning system has been successfully integrated. Please bear with us while we get used to our new system and thank you for your understanding. If you have any difficulties accessing the system, let us know and we'll be happy to help you. Please see the planning pages on our website for more details.

Babergh and Mid Suffolk District Councils – Working Together

Mid Suffolk District Council | Council Offices | 131 High Street | Needham Market | IP6 8DL

Babergh District Council | Council Offices | Corks Lane | Hadleigh | IP7 6SJ

*Please be advised that any comments expressed in this email are offered as a informal professional opinion unless otherwise stated and are given without prejudice to any decision or action the Council may take in the future. Please check with the email's author if you are in any doubt about the status of the content of this email. Any personal information contained in correspondence shall be dealt with in accordance with Mid Suffolk and Babergh District Council's Data Protection policy and the provisions of the Data Protection Act as found on both Council's websites.*



**From:** David Pizzey  
**Sent:** 20 July 2017 12:13  
**To:** Dylan Jones  
**Subject:** RE: Application DC/17/02232 - Church Road, Thurston

Hi Dylan

I'm confused, those comments were for DC/17/02782, a different site altogether?

**David Pizzey**  
Arboricultural Officer

Hadleigh office: 01473 826662

Needham Market office: 01449 724555

[david.pizzey@baberghmidsuffolk.gov.uk](mailto:david.pizzey@baberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Babergh and Mid Suffolk District Councils - Working Together

**From:** Dylan Jones  
**Sent:** 20 July 2017 11:44  
**To:** David Pizzey  
**Subject:** Application DC/17/02232 - Church Road, Thurston

Hi David. I have looked at your consultation response for the above where you say that you do not object to this proposal to this proposal if the existing access road into the site is to be used, but you would have issues with it if a new access road was to be created. Looking at the plan, the applicant is proposing a brand new access road to the south of the existing dwelling which would cut through part of that dwelling's garden and then into the field. Having regards to what you said in your consultation response, can you be more specific if you have an issue with this, if it is solvable or whether you out rightly object to this proposal.

Thanks.

**Dylan Jones**

**Consultant Senior Development Management Officer**

**01449 724537**

**Babergh and Mid Suffolk District Councils – Working Together**

**(Please note I work Mondays to Thursdays only)**

Web: [www.babergh.gov.uk](http://www.babergh.gov.uk) or [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**Important Update Regarding Planning Service:**

Our new joint planning system has been successfully integrated. Please bear with us while we get used to our new system and thank you for your understanding. If you have any difficulties accessing the system, let us know and we'll be happy to help you. Please see the planning pages on our website for more details.

Babergh and Mid Suffolk District Councils – Working Together

Mid Suffolk District Council | Council Offices | 131 High Street | Needham Market | IP6 8DL

Babergh District Council | Council Offices | Corks Lane | Hadleigh | IP7 6SJ

*Please be advised that any comments expressed in this email are offered as a informal professional opinion unless otherwise stated and are given without prejudice to any decision or action the Council may take in the future. Please check with the email's author if you are in any doubt about the status of the content of this email. Any personal information contained in correspondence shall be dealt with in accordance with Mid Suffolk and Babergh District Council's Data Protection policy and the provisions of the Data Protection Act as found on both Council's websites.*

**From:**David Pizzey  
**Sent:**13 Jul 2017 11:46:36 +0100  
**To:**Dylan Jones  
**Cc:**BMSDC Planning Area Team Yellow  
**Subject:**17/02782 Land Off Church Road, Thurston.

Dylan

I have no objection to this proposal subject to access being provided via the existing for The Firs, Church Road. However, any requirement to alter or widen this is likely to have an impact on important TPO trees and therefore will require careful consideration.

Regards

David

**David Pizzey**  
Arboricultural Officer

Hadleigh office: 01473 826662

Needham Market office: 01449 724555

david.pizzey@babberghmidsuffolk.gov.uk  
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Babergh and Mid Suffolk District Councils - Working Together



-----Original Message-----

From: planningyellow@baberghmidsuffolk.gov.uk [mailto:planningyellow@baberghmidsuffolk.gov.uk]

Sent: 06 July 2017 12:33

To: David Pizzey

Subject: Planning Consultation Request - DC/17/02782

Please find attached planning consultation request letter relating to planning application - DC/17/02782  
- Land Off , Church Road, Access Via Garden Of 'The Firs', Thurston

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

**From:** David Pizzey  
**Sent:** 13 July 2017 11:47  
**To:** Dylan Jones  
**Cc:** BMSDC Planning Area Team Yellow  
**Subject:** 17/02782 Land Off Church Road, Thurston.

Dylan

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Regards

David

**David Pizzey**  
Arboricultural Officer  
Hadleigh office: 01473 826662  
Needham Market office: 01449 724555  
[david.pizzey@babberghmidsuffolk.gov.uk](mailto:david.pizzey@babberghmidsuffolk.gov.uk)  
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Babergh and Mid Suffolk District Councils - Working Together



13 March 2019

Mark Brands  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

---

*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

---

**Application:** DC/17/02782  
**Location:** Land Off Church Road Access Via Garden Of 'The Firs' Thurston  
**Proposal:** Outline Planning Application (Access to be considered)- Erection of 15 dwellings (including 5 affordable bungalows)

Dear Mark,

Thank you re-consulting Place Services on the above application.

Recommended refusal	
No ecological objections	
Recommended approval subject to attached conditions	x
Further information required prior to determination	

### Summary

We have reviewed the Ecological Scoping Survey Report (Hillier Ecology, June 2017 – amended February 2019), provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species/habitats.

We have also reviewed the Arboricultural Report (Land & Sculpture Design Partnership, August 2017, revision A), which demonstrates the proposed hedgerow compensation for the access of this site.

We are now satisfied that there is sufficient ecological information available for determination, subject to following recommendations which will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006:



### **Further Surveys for Farmland Birds**

A Breeding Bird Survey should be provided for this application to allow the Local Planning Authority to have certainty of impacts on Priority farmland bird species. This survey should be provided concurrent to reserved matters and follow appropriate guidelines, as set out by the British Trust of Ornithology. If further mitigation measures are required for Priority species, then this should be outlined within a method statement prior to commencement.

### **Biodiversity Method Statement**

To ensure that appropriate mitigation measures are undertaken for Protected and Priority species during the construction phase it is recommended that a Biodiversity Method Statement should be submitted prior to commencement of this application. This shall include the following precautionary mitigation measures:

- Good practice construction measures for reptiles species.
- Good practice construction measures for hedgehogs and other mammal species.
- Precautionary mitigation for nesting birds
- Appropriate mitigation for priority farmland bird species (if required).

### **Wildlife Friendly Lighting Design Scheme**

It is recommended that a Wildlife Friendly Lighting Design Scheme is submitted prior to occupation for this application. This shall be completed in accordance with guidelines from the Bat Conservation Trust and Institute of Lighting Professionals<sup>1</sup>, to protect and enhance the site for foraging and commuting bat species.

Therefore, the following details should be considered to demonstrate an appropriate lighting design scheme for this application and avoid light pollution impacts on bat species:

- Lighting should be positioned to avoid illumination of retained habitats such as trees or hedgerows.
- Light columns in general should be as short as possible as light at a low level reduces the ecological impact.
- Movement sensors and timers should be used to minimise the time that lights are on.

### **Recommended conditions**

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent:

#### **1. CONCURRENT WITH RESERVED MATTERS: FARMLAND BIRD SURVEY**

*No development shall take place until a survey to detect the presence of Priority Farmland Bird species has been carried out. The results and any further recommendations shall be submitted to and approved in writing by the Local Planning Authority.*

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<sup>1</sup> <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>



**Reason:** To conserve and protect Priority species and allow the LPA to discharge its duties under the s40 of the NERC Act 2006.

## **2. CONCURRENT WITH RESERVED MATTERS: BIODIVERSITY METHOD STATEMENT**

*“No development shall take place (including any demolition, ground works, site clearance) until a Biodiversity Method Statement for Protected and Priority species has been submitted to and approved in writing by the local planning authority.*

*The content of the method statement shall include the following:*

- a) purpose and objectives for the proposed works;*
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);*
- c) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;*
- d) persons responsible for implementing the works;*
- e) initial aftercare and long-term maintenance (where relevant);*
- f) disposal of any wastes arising from works.*

*The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.”*

**Reason:** To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended, s40 of the NERC Act 2006 (Priority habitats & species)

## **3. PRIOR TO OCCUPATION: LANDSCAPE and ECOLOGICAL MANAGEMENT PLAN**

*“A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.*

*The content of the LEMP shall include the following:*

- a) Description and evaluation of features to be managed.*
- b) Ecological trends and constraints on site that might influence management.*
- c) Aims and objectives of management.*
- d) Appropriate management options for achieving aims and objectives.*
- e) Prescriptions for management actions.*
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) Details of the body or organization responsible for implementation of the plan.*
- h) Ongoing monitoring and remedial measures.*

*The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the*





*development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

**Reason:** To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

#### **4. PRIOR TO OCCUPATION: BIODIVERSITY ENHANCEMENT STRATEGY**

*"A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter."*

**Reason:** To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

#### **5. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

*"A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."*

**Reason:** To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)



Please contact us with any queries.

Yours sincerely,

**Hamish Jackson BSc (Hons) GradCIEEM MRSB**

Junior Ecological Consultant

Place Services at Essex County Council

[Hamish.Jackson@essex.gov.uk](mailto:Hamish.Jackson@essex.gov.uk)

**Place Services provide ecological advice on behalf of Babergh District Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



15 August 2017

Dylan Jones  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market  
Ipswich IP6 8DL

By email only

Dear Dylan

**Application: DC/17/02782**

**Location: Land Off Church Road, Access Via Garden Of 'The Firs', Thurston**

**Proposal: Outline Planning Application (Access to be considered) - Erection of 15 dwellings (including 5 affordable bungalows)**

Thank you for consulting Place Services on the above application.

**Holding objection: There is insufficient ecological information available to understand the residual impacts of development on Priority habitats, particularly hedgerows. This is due to a lack of assessment of hedgerow loss for access to the site.**

The submitted ecological scoping survey report (Hillier Ecology, June 2017) aims to assess the likely impacts of development on Protected and Priority species but makes minimal reference to loss of trees and Priority habitat eg hedgerows for access to the site, other than reference to bat roost potential.

All likely impacts on Priority habitats need to be considered (not just significant ones) so there is therefore a gap in information which needs to be filled before determination of this application. This additional information is necessary to confirm the likely impacts on hedgerows, and that any necessary mitigation measures have been secured.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection.

Please contact me with any queries.

Best wishes

**Sue Hooton CEnv MCIEEM BSc (Hons)**

Principal Ecological Consultant

Place Services at Essex County Council

[sue.hooton@essex.gov.uk](mailto:sue.hooton@essex.gov.uk)

07809 314447



**Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



27 March 2018

Gemma Walker  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

Dear Gemma,

---

*Thank you for requesting advice on this application from Place Services's ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

---

**Application: DC/17/02782**

**Location: Land Off Church Road Access Via Garden Of 'The Firs' Thurston**

**Proposal: Planning Application. Erection of 24No dwellings including 8No Affordable Houses, vehicular access, garaging, parking and open space**

Thank you for re-consulting Place Services on the above application.

**Holding objection due to insufficient ecological information**

After review of the amended Ecological Scoping Survey Report (Hillier Ecology, February 2018) and Site Plan (Patrick Allen & Associates Ltd, January 2017) it is still considered that this application has insufficient information for determination. This is because there is currently no indication that native species will be planted to compensate the loss of hedgerows (priority habitat) proposed to be removed. This preferably should be demonstrated by providing the quantity of native hedgerow which will be removed and the quantity of native hedgerow that will be provided as compensation. This is necessary to ensure that the Local Planning Authority has certainty of impacts for the proposed development.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection.

Please contact me with any further queries.

Regards,

**Hamish Jackson GradCIEEM BSc (Hons)**  
Junior Ecological Consultant



Planning Services  
Mid Suffolk District Council,  
131 High Street,  
Needham Market,  
Suffolk IP6 8DL

15/08/2017

For the attention of: Dylan Jones

**Ref: DC/17/02782; Land off Church Road, Access via Garden of 'The Firs', Thurston**

Thank you for consulting us on the outline planning application (access to be considered) for the erection of 15 dwellings (including 5 affordable bungalows).

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

### **Recommendations**

The site sits outside the settlement boundary as shown on the current Mid Suffolk Local Plan and it is considered as a development in the countryside. One of the main constraints for this site is the views from the existing residential development at Woodland Close. The proposed development sits on an arable field and the development will change the nature of the landscape character.

The following points highlight our key recommendations for the submitted proposals:

- 1) If the outline application is approved, a landscape strategy needs to be produced which conforms to the principles established within the Landscape Visual Appraisal and it should include mitigating the impacts of the access road.
- 2) The proposed landscape strategy should incorporate integrated SuDS systems to attenuate water run-off from the development in addition to the proposed attenuation pond on the south-east corner of the site.
- 3) Proposed access road cuts through an existing green space; additional hedge and tree planting should be incorporated to provide the existing development to the south (The First) and recently approved development (application Ref. 3883/15) with some visual screening.. This additional planting will also help to mitigate the views from Church Road. The V-splays for the new access should be kept to a minimum in order to retain the rural character on this area. The recently approved development (Ref. 3883/15) indicates a plum hedge along the northern side of the outlined proposed access road. The landscape strategy should take into consideration the future proposals of adjacent site.
- 4) Drawing number 3749-05C Site Plan shows a proposed footpath along the northern boundary by the railway line. Existing vegetation will screen the proposed footpath from the railway line but it will also be screened from the proposed development by new planting as part of mitigation, proposed planting as part of the landscape strategy. The location for this footpath will therefore be very secluded with no passive surveillance. There are opportunities to improve the integration of this route within the development layout. The new location should allow for passive surveillance.

### **The proposal**

The outline application plans set out the outline planning application (access to be considered) for the erection of 15 dwellings (including 5 affordable bungalows).

The site of approximately 4.01ha is located west of existing residential properties along Church Road, Thurston, just south of the railway line from Ipswich to Bury St. Edmunds. The site is currently an arable field and is partly screened by existing hedge and tree planting on its south, north south-eastern boundaries.

### **Review on the submitted information**

Relevant to this landscape review, the submitted application includes a Landscape Visual Appraisal (LVA) and Site Plan Scheme plan.

The Landscape Visual Appraisal has been produced to the appropriate guidance. The report includes mitigation measures which are appropriate and should be used to inform and influence any detailed future development layout of the site. The LVA has assessed the impact of the new access road to the proposed development but no mitigation has been proposed along the access route up to the residential development.

As part of the outline application submission the indicative site layout plan shows the areas designated for residential development and open space including attenuation pond as part of SuDS, which is located within the lowest areas of the site. The indicative layout fails to suitably demonstrate how an appropriate and connected green infrastructure responds to the layout. As these proposals develop to a greater level of detail will be required, especially the boundary treatments within the residential development.

### **Likely impact on the surrounding landscape**

Desktop studies have not identified sensitive areas surrounding this site. However, its proximity to the residential units by Woodland Close and The Firs means that mitigation proposal and the landscape strategy should deal with any negative visual impact. Proposed Access road between Church Road and the proposed residential area shall also be assess for its potential negative impact on The Firs settlement and recently approved development Ref.3883/15.

Occasional views from the settlement to the west might occur.

### **Proposed mitigation**

There are opportunities to create small woodland parcels within the development area and hedgerow planting along the site boundaries to mitigate the visual impact of the proposals and create a suitable green infrastructure. The site already benefits of existing planting to the north and south boundaries which should be strengthened with new planting.

The indicative proposal shows an area of water attenuation and green open space on the south-east corner of the proposed development. As part of this feature, there are opportunities to include areas of habitat creation with the introduction of an appropriate planting.

The character of this area should remain fairly rural while including appropriate boundary treatments and providing opportunities for passive surveillance from the proposed housing layout.

Additional planting should be incorporated along the new access road between Church Road and entrance to the residential development.

There is opportunity for native hedgerow planting within the residential layout to improve public realm and provide a rural character.

Yours sincerely,

Almudena Quiralte BA (hons) DipLA, ALI  
Landscape Architect Consultant  
Telephone: 03330136858  
Email: almudena.quiralte@essex.gov.uk

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils**  
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.





Planning Services  
Mid Suffolk District Council,  
131 High Street,  
Needham Market,  
Suffolk IP6 8DL

15/08/2017

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**Ref: DC/17/02782; Land off Church Road, Access via Garden of 'The Firs', Thurston**

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Yours sincerely,

Almudena Quiralte BA (hons) DipLA, ALI  
Landscape Architect Consultant  
Telephone: 03330136858  
Email: almudena.quiralte@essex.gov.uk

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Resource Management  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Ipswich IP6 8DL

Enquiries to: Hannah Cutler  
Direct Line: 01284 741232  
Email: [Hannah.Cutler@suffolk.gov.uk](mailto:Hannah.Cutler@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2017\_02782  
Date: 17/07/2017

For the Attention of Dylan Jones

Dear Mr Isbell

### **Planning Application DC/17/02782– Land off Church Road, Thurston: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record, near the medieval church of Church of St Peter (THS 006). Investigation on Thedwastre Road (THS 017) revealed post-medieval and modern features and limited evidence of prehistoric and medieval occupation. This site has not been systematically assessed for archaeological remains, but is topographically favourable for early occupation, on the side of a small valley and there is potential for the discovery of below-ground heritage assets of archaeological importance within this area. Any groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to, and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).*

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made based on the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Dr Hannah Cutler

Archaeological Officer  
Conservation Team

# Consultee Comments for Planning Application DC/17/02782

## Application Summary

Application Number: DC/17/02782

Address: Land Off Church Road Access Via Garden Of 'The Firs' Thurston

Proposal: Outline Planning Application (Access to be considered)- Erection of 15 dwellings (including 5 affordable bungalows)

Case Officer: Mark Russell

## Consultee Details

Name: Mr Public Realm

Address: EH, Ipswich IP1 2BX

Email: [consultpublicrealm@baberghmidsuffolk.gov.uk](mailto:consultpublicrealm@baberghmidsuffolk.gov.uk)

On Behalf Of: Public Realm

## Comments

With respect to the latest site plan there is a sufficient amount of amenity space planned for a development of this size. Further details should be submitted under reserved matters concerning any amenity facilities, such as benches, to be provided in this area. This is not a space that would be adopted by MSDC so details of how this space is to be managed should also be submitted.

Peter Garrett

Corporate Manager for Countryside and Public Realm

# Consultee Comments for Planning Application DC/17/02782

## Application Summary

Application Number: DC/17/02782

Address: Land Off Church Road Access Via Garden Of 'The Firs' Thurston

Proposal: Outline Planning Application (Access to be considered)- Erection of 15 dwellings (including 5 affordable bungalows)

Case Officer: Mark Russell

## Consultee Details

Name: Mr Tony Bass

Address: Endeavour House, Ipswich IP1 2BX

Email: tony.bass@baberghmidsuffolk.gov.uk

On Behalf Of: Communities (Major Development)

## Comments

No specific comments regarding this application.

Fire Business Support Team  
 Floor 3, Block 2  
 Endeavour House  
 8 Russell Road  
 Ipswich, Suffolk  
 IP1 2BX

Babergh District Council  
 Planning Department  
 Corks Lane  
 Hadleigh  
 Ipswich  
 IP7 6SJ

Your Ref:  
 Our Ref: ENG/AK  
 Enquiries to: Mrs A Kempen  
 Direct Line: 01473 260486  
 E-mail: Angela.Kempen@suffolk.gov.uk  
 Web Address: www.suffolk.gov.uk

Date: 26 July 2017

**Planning Ref: DC/17/02782/OUT**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land Off Church road, Thurston IP31 3RN**  
**DESCRIPTION: 15 Dwellings**  
**NO: HYDRANTS POSSIBLY REQUIRED: Required**

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/



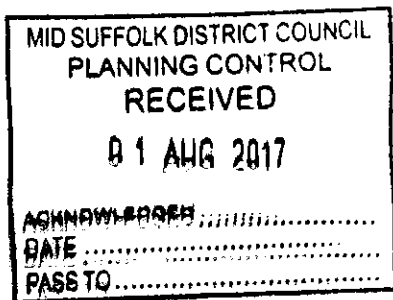
OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

Mrs A Kempen  
Water Officer

Babergh District Council  
Planning Department  
Corks Lane  
Hadleigh  
Ipswich  
IP7 6SJ



Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: FS/F305663  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 26/07/2017

Dear Sirs

**Land Off Church Road, Via the Firs, Thurston IP31 3RN**  
**Planning Application No: DC/17/02782/OUT**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

**Water Supplies**

Suffolk Fire and Rescue Authority recommends that fire hydrants be installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

OFFICIAL

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

Mrs A Kempen  
Water Officer

Enc: PDL1

Copy: Mr A Catton, Patrick Allen & Assoc. Ltd, 2 Grange Business Centre, Tommy Flowers Drive, Kesgrave, Ipswich IP5 2BY  
Enc: Sprinkler information

[Planningcontributions.admin@suffolk.gov.uk](mailto:Planningcontributions.admin@suffolk.gov.uk)

Your ref: DC/17/02782  
Our ref: Thurston – Land Off Church  
Road 00051364  
Date: 16 November 2018  
Enquiries to: Peter Freer  
Tel: 01473 264801  
Email: [peter.freer@suffolk.gov.uk](mailto:peter.freer@suffolk.gov.uk)

**By e-mail only:**

[planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk)

FAO Mark Russell - Principal Planning Officer

Dear Mark,

**Thurston: Land Off Church Road, Access Via Garden Of 'The Firs' – developer contributions**

I refer to the outline planning application (access to be considered) - erection of 15 dwellings (including 5 affordable bungalows).

Suffolk County Council (SCC) previously provided a written response to this application on 22 August 2017 which was time limited to six months. As this planning application has been reconsulted and will be determined outside of this six months' period, SCC has reviewed matters.

Thurston has been the subject of a number of recent proposals determined by the Local Planning Authority and SCC has successfully secured the provision of the infrastructure to serve the cumulative development, including road improvements, secondary education places, library provision, a new early years setting and a new primary school. In part, this will be funded by the district's Community Infrastructure Levy (CIL), but significant elements will also be financed by specific S106 planning obligations. This infrastructure delivery approach in Thurston was also tested at appeal.

Thurston Parish Council consulted on their pre-submission Neighbourhood Plan in May 2018. A positive attitude to growth has been proposed avoiding allocating sites which would have allowed the District Council to refuse further development as per NPPF para 14, but rather proposing policies to retain and enhance residential design, address highway capacity, securing contribution requirements to the provision of key infrastructure, and dwelling mix proportions. The infrastructure contributions set out in this letter are required to support Policy 1 of the pre submission Neighbourhood Plan. The Planning Practice Guidance, regarding what weight can be attached to an emerging Neighbourhood plan, states that it is for the decision maker to determine what is a material consideration and what weight to give to it.

This consultation response mainly deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Thurston.

Therefore to aid simplicity, as Mid Suffolk's CIL covers libraries, education places at existing schools and waste infrastructure, these have been removed from this letter but the County Council intends to make a future application for CIL funding of; **£3,240** towards libraries provision, **£16,668** towards temporary primary school accommodation and **£55,065** towards secondary places should permission be granted.

Appropriate mitigation from each planning application should continue to be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In the instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

I set out below Suffolk County Council's response, which provides the infrastructure requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council.

The County Council recognises that the District currently do not have a 5 year housing land supply in place, which means that paragraph 11d of the NPPF is to be used when decision-taking.

The National Planning Policy Framework (NPPF) paragraph 59 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District/Borough Councils have a shared approach to calculating infrastructure needs, which is set out in the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk'.

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and

Infrastructure.

- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

## **Community Infrastructure Levy**

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and started charging CIL on planning permissions granted from 11 April 2016. Mid Suffolk are required by Regulation 123 to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Public transport improvements
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

As of 06 April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy.

My previous letter dated 22nd August 2017 referred to the pooling limitations imposed by the CIL regulations and SCC's concern that regarding the quantum of development in Thurston. However these concerns can be fairly addressed as the Government has confirmed in October 2018 through its response to its "*Supporting housing delivery through developer contributions*" review that it intends to lift the pooling restriction in all areas. This will take some time to bring into effect and for the legislation to be amended but it shows the clear intention which is a welcome relief. However, as the changes are yet to be brought about, the pooling limitation can be addressed by splitting the new school project into phase 1 and 2 thereby allowing five obligations towards each phase.

Currently there are four obligations towards the first phase of the new primary school as the 106 agreement associated with Land at Meadow Lane has not been completed.

The requirements being sought below would be requested through S106A contributions as they fall outside of the adopted 123 list.

The details of specific S106A contribution requirements related to the proposed scheme are set out below:

- 1. Education.** Paragraph 94 of the NPPF states: ‘It is important that a sufficient choice of school places is 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 schools through the preparation of plans and decisions on applications; and
  - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.’

Furthermore, the NPPF at paragraph 104 states ‘Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

The local catchment schools are Thurston Church of England Primary Academy, Ixworth Free School and Thurston Community College.

School	Capacity				Actual/Forecast Pupil Numbers				
	Permanent	95%	Temporary	Total	2018-19	2019-20	2020-21	2021-2	2022-23
Thurston Church of England Primary Academy	210	200	0	200	217	232	242	255	263
Ixworth Free School (11 - 16)	597	567	0	567	260	281	300	310	346
Thurston Community College (11 - 16)	1526	1450	0	1,450	1466	1450	1465	1467	1496
<b>11-16 total places</b>	<b>2123</b>	<b>2017</b>		<b>2017</b>	<b>1,726</b>	<b>1,731</b>	<b>1,765</b>	<b>1,777</b>	<b>1,842</b>
Thurston Community College (Sixth Form)	405	385	0	385	254	279	277	272	263

School forecasts

School level	Minimum pupil yield:	Places required:
Primary school age range, 5-11:	4	4
High school age range, 11-16:	3	3

School places requirements

### Primary School

SCC forecasts show that there will be no surplus places available at the catchment primary school to accommodate any of the pupils anticipated to arise from this proposed development. The Primary School site is landlocked

and cannot be permanently expanded.

For a number of compelling reasons including improving education attainment, community cohesion and sustainability the central outcome is for those primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Thurston.

The strategy for primary school provision is to retain a single primary school for the village by relocating the existing school and delivering a new larger school.

Therefore the County Council will require proportionate developer contributions for land and build costs for the new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 4 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 15 dwellings it is forecast that 4 primary age pupils will arise
- Therefore 4 pupils x £16,429 per place = **£65,716 (2018/19 costs)**

The cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £741,316 for a 3 hectare site and equates to £1,765 per pupil place. For the proposed development, this equates to a proportionate land contribution of 4 places x £1,765 per place = **£7,060.**

Total primary school **S106** contribution:

£65,716 + £7,060 = **£72,776**

£72,776 / 15 dwellings = **£4,852 per dwelling**

### **Temporary classroom costs**

Temporary classroom arrangements. Whilst these mitigation requirements may still arise before a new school is opened, the District Council's published 123 List contains 'provision of primary school places at existing schools'. Whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction



commencing on the new school early on. The costs between renting and buying are comparative. At this stage SCC doesn't know how many additional houses the District Council or Parish Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile.

## **Secondary Schools**

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. Current forecasts identify that there are no longer sufficient surplus places available for pupils forecast to arise from the proposed development when taking into account other development in the catchment.

Against anticipated level of housing growth across the wider area a full assessment of secondary school requirements is in the process of being analysed with the initial view that in due course a new secondary school will be needed. The best estimate of current cost is in the region of £25m, with a site of 10 hectares.

Expansion/new provision will therefore be required which currently fall under the district's CIL funding.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision and all children in England receive 15 free hours free childcare. Through the Childcare Act 2016, from September 2017 families of 3 and 4 year olds may now be able to claim up to 30 hours a week of free childcare.

At present, in the Thurston area, there are four settings that offer places (2 childminders, Thurston Preschool and Tinkerbells Day Nursery). From a development of 15 dwellings, the County Council anticipates around 2 pre-school pupils eligible for funded early education. Based on the scale of development currently being assessed in Thurston, and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 60 place setting. Our latest estimates are that a 60 place early education setting costs £958,980 to construct on a site of approximately 915.2m<sup>2</sup> (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 2 children of the total 60 who would be accommodated within the new setting, could

be calculated as follows (revised costs from a similar scheme in Suffolk):

- £958,980 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £958,980/60 early years pupils = £15,983 per place
- From 15 dwellings there is the need for 2 additional places
- Therefore 2 pupils x £15,983 per place = **£31,966 (2018/19 costs)**

Total early years **S106** contribution:

**£31,966**

£31,966 / 15 dwellings = **£2,131 per dwelling**

**3. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

**4. Time limit.** The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

*P J Freer*

Peter Freer MSc MRTPI  
Senior Planning and Infrastructure Officer  
Strategic Development – Resource Management

cc Neil McManus, SCC  
Carol Barber, SCC  
Christopher Dashper, Chairman - Thurston Parish Council  
Steve Merry, SCC  
CIL expenditure, MSDC  
Christine Thurlow, MSDC

Your ref: DC/17/02782  
Our ref: Thurston – Land Off Church  
Road 00051364  
Date: 22 August 2017  
Enquiries to: Peter Freer  
Tel: 01473 264801  
Email: [peter.freer@suffolk.gov.uk](mailto:peter.freer@suffolk.gov.uk)

Mr Dylan Jones,  
Planning Department,  
Mid Suffolk District Council,  
Council Offices,  
131 High Street,  
Needham Market,  
Ipswich,  
IP6 8DL

Dear Dylan,

**Thurston: Land Off Church Road, Access Via Garden Of 'The Firs' – developer contributions**

I refer to the outline planning application (access to be considered) - erection of 15 dwellings (including 5 affordable bungalows).

Thurston is the subject of a number of proposals being considered by the Local Planning Authority. Five applications for planning permission were presented to the District's planning referrals committee on 12<sup>th</sup> July 2017 and have been part of a Developer Forum process whereby the cumulative impact of the total number of dwellings have been assessed against local infrastructure.

There is a need for a coordinated managed approach to the provision of the infrastructure to serve the cumulative development, including road improvements, secondary education places, library provision, a new early years setting and a new primary school. In part, this will be funded by the district's Community Infrastructure Levy (CIL), but significant elements will also be financed by specific planning obligations. **Suffolk County Council is concerned about the number of separate applications for planning permission and the overall quantum of development. If individual contributions were accepted from a number of sites then the limit of five for any one infrastructure project, imposed by CIL Regulation 123, would be exceeded, leading to a future shortfall in the funding of the overall scheme. This is a matter that the District Council as Local Planning Authority will need to consider further.**

To aid simplicity, as Mid Suffolk's CIL covers libraries, education places at existing schools and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £3,240 towards libraries provision and £55,065 towards secondary places should permission be

granted.

This consultation response mainly deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Thurston. Appropriate mitigation from each of the 'live' planning applications should be secured by way of a Section 106 planning obligation however the CIL regulations 'pooling limitation' is a matter for the District Council to take a view on. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

I set out below Suffolk County Council's response, which provides the infrastructure requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council. This consultation response considers the cumulative impacts on education arising from existing planning applications which, when including the 15 dwellings from this proposed development, amount to a total of 847 dwellings.

The County Council recognises that the District currently do not have a 5 year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is seen as the golden thread running through plan-making and decision-taking.

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District Councils have a shared approach to calculating infrastructure needs, which is set out in the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk'.

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and Infrastructure.

- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

## Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and started charging CIL on planning permissions granted from 11 April 2016. Mid Suffolk are required by Regulation 123 to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Public transport improvements
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

As of 06 April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy.

The requirements being sought here would be requested through S106A contributions as they fall outside of the adopted 123 list.

The details of specific S106A contribution requirements related to the proposed scheme are set out below:

- 1. Education.** NPPF paragraph 72 states ‘The Government attaches great importance to ensuring that a sufficient choice of school places is 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’.

The NPPF at paragraph 38 states ‘For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.’

School	Capacity				Actual/Forecast Pupil Numbers				
	Permanent	95%	Temporary	Total	2016-17	2017-18	2018-19	2019-20	2020-21
Thurston CE Academy	210	200		200	196	211	212	208	203
Ixworth Free School (11 - 16)	597	567	0	567	271	300	342	350	344
Thurston Community College (11 - 16)	1500	1425	0	1,425	1,561	1599	1585	1547	1547
<b>11-16 total places</b>	<b>2097</b>	<b>1992</b>		<b>1992</b>	<b>1,832</b>	<b>1,899</b>	<b>1,927</b>	<b>1,897</b>	<b>1,891</b>
Thurston Community College (with Sixth Form)	1940	1,843	0	1,843	1,828	1,849	1,862	1,872	1,868

School level	Minimum pupil yield:	Required:
Primary school age range, 5-11:	4	4
High school age range, 11-16:	3	3

The local catchment schools are Thurston Church of England Primary Academy, Ixworth Free School and Thurston Community College.

### Primary School

SCC forecasts show that there will be no surplus places available at the catchment primary school to accommodate any of the pupils anticipated to arise from this proposed development. The Primary School site is landlocked and cannot be permanently expanded.

For a number of compelling reasons including improving education attainment, community cohesion and sustainability the central outcome is for those primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Thurston.

Due to the current uncertainty over the scale, location and distribution of housing growth in the Thurston locality it is not clear at this point in time whether the most sustainable approach for primary school provision is to:

- a. Retain a single primary school for the village by relocating and delivering a new larger school; or,
- b. Retain the current primary school and deliver a second (new) primary school for the village.
- c. Whichever strategy is the most appropriate a site of a minimum size of 2.2 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).

- d. In the short term the head teacher has agreed to the siting of a temporary double mobile classroom for 60 pupils. However this is strictly on the understanding that such mitigation is only of a limited and temporary nature ahead of determining either a. or b. above.
- e. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 4 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 15 dwellings it is forecast that 4 primary age pupils will arise
- Therefore 4 pupils x £16,429 per place = **£65,716 (2017/18 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £543,620 for a 2.2 hectare site and equates to £1,294 per pupil place. For the proposed development, this equates to a proportionate land contribution of 4 places x £1,294 per place = **£5,176.**

At present two planning applications (under references 5070/16 and 4963/16) include land identified for education use but planning permission for neither site has been granted permission by Mid Suffolk District Council. It is therefore suggested that consideration be given to imposing an appropriate planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition can be discharged once construction of the new primary school has commenced. This recognises the importance that the Government attaches to education provision as set out in paragraphs 38 and 72 of the NPPF. **This is a matter for the District to take a view on when considering the application of the 6 tests set out in the National Planning Policy Framework.**

Suggested planning condition restricting dwelling occupations linked with surplus places available at the catchment village primary school.

### **Temporary classroom costs**

Temporary arrangements will need to be put in place to accommodate the additional pupils arising from new homes before the completion of the new primary school. The District Council's published 123 List contains 'provision of

primary school places at existing schools'. Whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. At this stage SCC doesn't know how many additional houses the District Council or Parish Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile. Even then this will only accommodate 60 pupils, i.e. approximately 240 dwellings and there are more than this number in the current undetermined applications for planning permission.

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place =  $\text{£}250,000/60 = \text{£}4,167$
- Primary age pupils arising from this site is 4
- Proportionate contribution towards temporary classroom is 4 pupils x  $\text{£}4,167$  per place =  $\text{£}16,668$

## Secondary Schools

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. Current forecasts identify sufficient surplus places available for pupils forecast to arise from the proposed development, however when taking into account other development in the catchment it is likely expansion will be required which would fall under CIL.

Against anticipated level of housing growth across the wider area a full assessment of secondary school requirements is in the process of being analysed with the initial view that in due course a new secondary school will be needed. The best estimate of current cost is in the region of £25m, with a site of 10 hectares.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Act 2011



amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

Through the Childcare Act 2016, the Government will be rolling out an additional 15 hours free childcare to eligible households from September 2017.

At present, in the Thurston area, there are four settings that offer places (2 childminders, Thurston Preschool and Tinkerbells Day Nursery). From a development of 15 dwellings, the County Council anticipates around 2 pre-school pupils eligible for funded early education. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m<sup>2</sup> (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 2 children of the total 60 who would be accommodated within the new setting, could be calculated as follows (revised costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place
- From 15 dwellings there is the need for 2 additional places
- Therefore 2 pupils x £8,333 per place = **£16,666 (2017/18 costs)**

**3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

**4. Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and

Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002).

- 5. Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Mid Suffolk housing team to identify local housing needs.
- 6. Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

*“local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate.”*

The changes set out in the MWS took effect from 06 April 2015.

- 7. Fire Service.** The Suffolk Fire and Rescue Service requests that early Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX

consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

**8. Superfast broadband.** SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as impacting property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

**9. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

**10. Time limit.** The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

*P J Freer*

Peter Freer MSc MRTPI  
Senior Planning and Infrastructure Officer  
Strategic Development – Resource Management

cc Neil McManus, SCC  
Sonia Docherty, SCC  
Christopher Dashper, Chairman - Thurston Parish Council  
Christine Thurlow, MSDC  
Steve Merry, SCC

## **MID SUFFOLK DISTRICT COUNCIL**

TO: Mark Russell – Senior Planning Officer

From: Julie Abbey-Taylor, Professional Lead – Housing Enabling

Date: 21st January 2019

SUBJECT: Outline planning application DC/17/02782 Erection of 15 dwellings on land off Church Road, Thurston.

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### **Consultation Response on Affordable Housing Requirement**

#### **Key Points**

##### **1. Background Information:**

- A development of 15 dwellings.
- This development triggers Local Plan Amended Policy H4 and therefore up to 35% affordable housing would be required on this site.
- Based on 15 dwellings, 5 units of affordable housing would be sought. The applicant's agent has included 5 affordable units.
- 

##### **2. Housing Need Information:**

2.1 The Ipswich Housing market Area Strategic Housing Market Assessment confirms a continuing need for housing across all tenures and a growing need for affordable housing. The most recent update of the Strategic Housing Market Assessment completed in 2017 confirms **a minimum need of 94 affordable homes per annum.**

2.2 The most recent version of the SHMA specifies an affordable housing mix equating to 41% for 1 bed units, 40% 2 bed units, 16% 3 bed units and 3% 4+ bed units. Actual delivery requested will reflect management practicalities and existing stock in the local area, together with local housing needs data and requirements.

2.3 The Council's Choice Based Lettings system currently has circa. 724 applicants registered for the Mid Suffolk area as of January 2019.

2.4 As this is a planning gain site, it would be required to meet district wide need so the **724** figure is the one to be applied in this case.

2.5. Our 2014 Housing Needs Survey shows that there is a need across all tenures for smaller units of accommodation, which includes accommodation suitable for older people, wishing to downsize from larger privately-owned family housing, into smaller privately-owned apartments, bungalows and houses.

2.6 It would also be appropriate for any open market apartments and smaller houses on the site to be designed and developed to Lifetime-Homes standards, making these attractive and appropriate for older people.

### 3. Affordable Housing Requirement for Thurston:

Affordable Housing Requirement	35 % of units = 5 affordable units
Tenure Split – 75% Rent & 25 % Intermediate e.g. New Build Homebuy accommodation, intermediate rent, shared ownership or starter homes.	<p>The application has provided 5 affordable dwellings although the internal floor area is not shown on the proposed plan.</p> <ul style="list-style-type: none"> <li>• 3 x 2 bed 4-person bungalows -should be provided @ 70 sqm</li> <li>• 2 x 3 bed 5-person bungalows – should be provided @ 86sqm</li> </ul> <p>Of the 5 proposed it would be preferred if the 3 bed bungalows were changed to 2 bed 4-person houses at 79sqm each, and that these are provided as shared ownership properties. The remaining 2 bed bungalows will be acceptable for affordable rent if built to 70sqm.</p>
Other requirements	<p>Properties must be built to current Nationally Described Space Standards.</p> <p>The Shared Ownership properties must have an initial purchase limit of 70%.</p> <p>The Council will not support a bid for Homes England grant funding on the affordable homes delivered as part of an open market development. Therefore, the affordable units on that part of the site must be delivered grant free.</p> <p>The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice.</p> <p>On larger sites the affordable housing should not be placed in groups of more than 15 units.</p>

	Adequate parking provision is made for the affordable housing units
	It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see <a href="http://www.midsuffolk.gov.uk">www.midsuffolk.gov.uk</a> under Housing and affordable housing for full details.

**Open Market Mix.**

The 10 open market dwellings proposed are composed of 5 x 4 bed houses and 5 x 5 bed houses. This is not seen as a good mix of dwelling types given that in Thurston there are already large quantities of larger family and executive homes available. Given that 85.1% of the total households in Thurston are already under-occupied by one or more bedroom, the type of housing that is lacking in the village and in demand are the 2 and 3 bed houses for young households and older households wishing to downsize. Also the provision of bungalows for older people would have been welcomed particularly 3 bedroomed bungalows or chalet bungalows.

**Recommendation:**

The composition of the affordable homes needs to be changed to 2 x 2 bed houses and 3 x 2 bed bungalows – all built to meet Nationally Described Space standards. The **open market mix is not supported** as it does not meet the needs of those in the village/district wishing to buy their first home or to downsize/right-size for those currently living in larger 3, 4 and 5 bed homes.

**Julie Abbey-Taylor, Professional Lead – Strategic Housing.**

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# Agenda Item 7e

## Committee Report

Item 7E

Reference: DC/19/01604

Case Officer: Jamie Edwards

Ward: Rattlesden.

Ward Member/s: Cllr Penny Otton.

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## **RECOMMENDATION – APPROVAL OF PLANNING PERMISSION WITH CONDITIONS**

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### **Description of Development**

Outline Planning Application (Access to be considered) - Erection of 1no. dwelling and garage.

### **Location**

Land Adjacent BT Exchange, Rising Sun Hill, Rattlesden, Suffolk IP30 0RL

**Parish:** Rattlesden

**Expiry Date:** 12/07/2019

**Application Type:** OUT - Outline Planning Application

**Development Type:** Minor Dwellings

**Applicant:** Dover Farm Developments Ltd

**Agent:** Phil Cobbold Planning Ltd

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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The application is referred to committee for the following reason:

Councillor call in- The application is considered to be of a controversial nature. Lack of securing a S106 agreement on the garden area for the primary school on the previous approved application. The cumulative effect of number of vehicle movements as a result of numerous approvals and current applications. Impact on junction of Rising Sun Hill and Lower Road/Felsham Road.

### **Details of Pre-Application Advice**

None

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## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

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### **Summary of Policies**

CS01 - Settlement Hierarchy

CS02 - Development in the Countryside & Countryside Villages

CS04 - Adapting to Climate Change

CS05 - Mid Suffolk's Environment

SB03 - Retaining visually important open spaces

RT12 - Footpaths and Bridleways

GP01 - Design and layout of development  
CL08 - Protecting wildlife habitats  
SC04 - Protection of groundwater supplies  
HB08 - Safeguarding the character of conservation areas  
NPPF - National Planning Policy Framework

### **Neighbourhood Plan Status**

This application site is not within a Neighbourhood Plan Area.

### **Consultations and Representations**

During the course of the application Consultation and Representations from third parties have been received. These are summarised below.

#### **A: Summary of Consultations**

##### **Rattlesden Parish Council**

Rattlesden Parish Council objects to this application.

The previous application (2194/16) for this critical site within the heart of the village - a designated Conservation Area - provided for a nature garden for the nearby Primary School at this location. While the Parish Council was less than keen on a housing development which was outside the settlement boundary, it recognised the significant benefits which would accrue to the School and also that a nature garden was not only consistent with its green agenda but also would majorly enhance the attractiveness of the site. Accordingly, it was pleased to support the application.

DC/19/01604 is self-evidently a superseding application which, if granted, offers only disbenefits for the centre of the village. Clearly, for whatever reason, the nature garden was not progressed. That is a genuine loss to Rattlesden but was fundamental and key to the original application being acceptable. This 'replacement' application (albeit through a different applicant) offers nothing on the site to the village and is, simply, a further example of creeping overdevelopment which is totally unacceptable. It would not be unreasonable to suggest to say that the Parish Council, on behalf of the village, feels completely misled by how the present position has come about.

The application claims that the proposed shared access will have "no material impact on highway safety". That is extremely questionable. Since the access was provided for by application 2914/16 the traffic situation has been subject to overwhelming change. There have been major developments in the village on Top Road and on land adjacent to Roman Rise - both immediately beyond the site represented by this application. Not only the applicant but also, and crucially, Suffolk Highways must recognise and take this change into proper account.

The 22 dwellings as per DC/18/00229 (land adjacent to Roman Rise) and eight dwellings as per DC/18/02258 (Top Road) will both impact negatively upon minor, narrow roads which are already overburdened and unable to cope with the current volumes of traffic. Both will feed substantially increased traffic movements through their obvious and main access road - Rising Sun Hill - the very route on to which this latest application would provide for egress/access. So there must be an impact from this proposal. Moreover, all routes lead to a tiny but remarkably busy junction at the bottom of Rising Sun Hill where visibility is a pre-existing problem - and which is the main access road to the local school and where not only parents park at busy school times but also school buses (as there is no alternative site). The health and safety risks cannot be over-emphasised.

### **Additional Comments from Rattlesden Parish Clerk**

Firstly, the design of the original dwellings was considered particularly suitable and was, together with the graveyard extension and nature garden, critical to Parish Council support (i.e. designed to look like a farmhouse and associated buildings - very much in keeping with the location). It is appreciated that no design is offered within the present application but that also precludes Parish Council support in this key site. Secondly, re highways. The earlier Parish Council comments inadvertently did not account for the impact of the site directly opposite on Rising Sun Hill which was also agreed subsequently and which, itself, has access on to Rising Sun Hill - necessarily in conflict with the access to be achieved for the proposed application. The two together will create congestion on a busy/dangerous stretch of road which has significant pedestrian activity.

### **Environmental Health - Land Contamination**

Many thanks for your request for comments in relation to the above application.

Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

### **SCC - Highways**

No objection subject to conditions.

### **Natural England**

Natural England has no comments to make on this application.

### **Ecology - Place Services**

No objection subject to securing biodiversity mitigation and enhancement measures

### **Heritage Team**

Based on the limited amount of information included with this outline application, the Heritage Team considers that the erection of a dwelling and garage on this site would likely cause no harm to the character and appearance of the Rattlesden Conservation Area, subject to matters of layout, scale, massing, design, use of materials and boundary treatment.

### **Stowmarket Ramblers**

It appears that footpath no. 58 runs within part of the western boundary of this site. It is not clear from these plans as to what provision has been made for this path to continue along its route as per the definitive map and statement for the parish of Rattlesden.

### **B: Representations**

One third party representation from Rattlesden Primary Academy

- No material benefit to Rattlesden Primary Academy, we must withdraw our support for this application.

Non planning comments - Disappointed that this planning application removes the provision of a nature area for the school.

## **PLANNING HISTORY**

**REF:** 2194/16

Erection of two detached dwellings with garages. Extension to graveyard and provision of nature garden for primary school

**DECISION:** GTD  
09.01.2017

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## **PART THREE – ASSESSMENT OF APPLICATION**

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### **1. The Site and Surroundings**

- 1.1. The site lies in the south west corner of the village of Rattlesden, in the Conservation Area, but abutting the Settlement Boundary to the north. The land slopes upwards to the south away from the river valley.
- 1.2. Part of the west boundary abuts/is a public footpath.
- 1.3. The site was included in a red line plan under reference 2194/16 (two dwellings) as a nature garden for Rattlesden Primary School.

### **2. The Proposal**

2.1. The application is an outline application for 1no. dwelling and garage with access to be considered. All other material matters are reserved.

### **3. The Principle Of Development**

- 3.1. The site abuts the settlement boundary of Rattlesden and is therefore classed as countryside according to policy CS1 of the Mid Suffolk Local Plan.
- 3.2. Policy CS2 of the Mid Suffolk Local Plan allows exceptions for countryside development. However, this application does not represent an exception under policy CS2.
- 3.3. The Local Planning Authority can currently evidence a 5yr housing supply of land.
- 3.4. Based on these points the Local Planning Authority would restrict countryside.
- 3.5. However, contextually the site does abut the settlement boundary, it would therefore be unreasonable to refuse the application on the mere fact it is classified as countryside. Particularly when Rattlesden is classed a Key Service Area, hosting services such as a school, community shop, post office and public house.
- 3.6. It is considered that the site would make positive gains in the objectives of sustainable development set out in paragraph 8 of the NPPF. During construction there would be a temporary benefit for the economy to local builders. There would be an ongoing social and economic benefit of one additional dwelling to support the services of the village and an additional dwelling. The site would also have a reduced reliance on a motor vehicle to access services which are available in the village.

3.7. Furthermore, the site was previously part of an extant permission for two dwellings to the south (2194/16). This site infills those approved dwellings and the settlement boundary essentially representing the third dwelling for the site overall.

3.8. It is noted that under the 2194/16 permission for a nature garden for the local Primary School was proposed in the location of this current application. Whilst the extant permission may have been seen as favourable due to the 'gift' of a nature garden, this was never formally agreed under a legal agreement or condition. As part of the school there would have also been conflict with the Council's CIL 123 List that includes extensions for education facilities that would have prevented securing of such agreement. The provision was also not determined previously as being necessary in making the application site acceptable.

3.9. The nature garden proposed previously is not considered to be an essential space that the school requires to ensure it remains open or necessary to mitigate the burden of the proposed development. It is a space that would be a positive addition, but not essential. On this basis the current proposal is determined on its individual merits. Accordingly, the principle of development is therefore considered acceptable as the site is deemed sustainable with no current use on the site that should be retained. However, there may be need for a revised scheme, amendments or revised details to conditions such as landscaping to enable access to this site through the scheme of two dwellings now implemented to avoid any conflict, but this is not the concern of this application or forms the considerations for this application.

#### **4. Site Access, Parking And Highway Safety Considerations**

4.1. The application is an outline application and includes access.

4.2. The site will utilise the existing access to the whole site on Rising Sun Hill. This access has been implemented as part of the extant permission. This is the only development on the site that has been implemented. The remain site remains undeveloped.

4.3 The driveway will run between the garage of the extant permission and Rising Sun Hill.

4.4. Highways Team have reviewed the application and have no objections or concerns relating to the access and highways safety. Conditions have been recommended, all of which have been included in this recommendation.

4.5. A second access exists directly on to the junction of Rising Sun Hill, Lower Road and Felsham Road. The red line plan does not include the area in which this access meets the junction and therefore is not included in the application. However, it is a material consideration because if the application was approved and developed an additional access would exist into the site which is currently outside of the local planning authority's control. The advice here is to show this north west corner in any subsequent reserved matters application with soft natural boundary treatment, such as a hedgerow, in essence stopping up the existing access at the boundary edge. If this is missing from a subsequent reserved matters application there is a high risk that it would be refused.

4.6. Concerns have also been raised but the Parish Council regarding the cumulative impacts to the highway and particularly the junction of Rising Sun Hill, Lower Road and Felsham Road and during school drop off and pick up times.

4.7. Nearby permissions for 5 houses (4044/16) on the opposite side of Rising Sun Hill, 22 dwellings approved under DC/18/00229 further south, approximately 600m, along Rising Sun Hill and 8 dwellings approved under DC/18/02258 which is approximately 600m to the south west on Top Road which joins onto Rising Sun Hill.

4.8. It is considered that the addition of one new dwelling would not have significant impacts on highway safety or the capacity in which the highway can withstand. 37 dwellings in total have been approved in the area, one addition will not significantly change the circumstances or tip over any threshold. The addition of a single household is not considered to significantly demonstrate highway concern to warrant refusal.

## **5. Design And Layout [Impact On Street Scene]**

5.1. The application is for an outline permission. Therefore, details of design and layout are reserved.

5.2. That said, the site does offer some constraints that should feed into a design brief.

5.3. The site is elevated from the road and therefore heights should be kept to a minimum to ensure that any dwelling would not be imposing on the junction corner. Recommendation is to focus on single storey or 1.5 storey as a maximum. Unlike the two storey dwellings which are set further back into the site.

5.4. The design and layout should also carefully acknowledge the relation to the extant two dwellings to the south of the site and its presence as a corner plot on the junction. Justification for which way the dwelling should face and interact with its surrounding should be given in a design and access statement.

5.5. Careful consideration should also be given to how the layout and boundary treatments would affect the public footpath in which the site shares its boundary.

## **6. Landscape Impact, Trees, Ecology, Biodiversity And Protected Species**

6.1. The application includes an Ecology survey. Places Services Ecology department are satisfied with this survey and conditions are attached for mitigation and enhancement measures.

## **7. Land Contamination**

7.1. The application includes a land contamination questionnaire and survey. Both satisfy the Environmental Health officer and an informative is added to the decision for the applicant to notify the Council should they discover any issues during development.

## **8. Heritage Issues [Including The Impact On The Character And Appearance Of The Conservation Area And On The Setting Of Neighbouring Listed Buildings]**

8.1. The site is within a conservation area.

8.2. The heritage officer has confirmed that subject to detail, layout and materials, the erection of a dwelling and garage will have no impact on the conservation area.

8.3. These matters are reserved and therefore will be considered under a subsequent application.

## **9. Impact On Residential Amenity**

9.1. Residential amenity impact details rely on the design and layout which are reserved matters. Therefore, a full assessment will be made with a subsequent application.

9.2. That said the site is unlikely to give rise to significant amenity issues due to its location and being at least 30m from another dwelling.

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## **PART FOUR – CONCLUSION**

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### **10. Planning Balance and Conclusion**

10.1. The site is considered to be countryside development according to policies CS1 and CS2 of the Mid Suffolk Local Plan. Therefore, development would normally be restricted.

10.2. However, due to the site abutting the settlement boundary and the services available in Rattlesden it would be considered unreasonable to refuse the application merely on the basis it is classed as being countryside.

10.3. Therefore, the principle of development should not be refused for one dwelling on the site.

10.4. The application would not give rise to any significant impacts to highways that would warrant a refusal, as set out in the above report.

10.5. All other matters are reserved and will be considered under a subsequent application, however there are no issues in principle considered likely to prevent a good quality development in principle.

### **RECOMMENDATION**

Recommendation is to approve the application with the following conditions:

Time limit for reserved matters application.

All Conditions as recommend by the Highways Officer.

All conditions recommended by the Ecology officer regarding mitigation and enhancement.

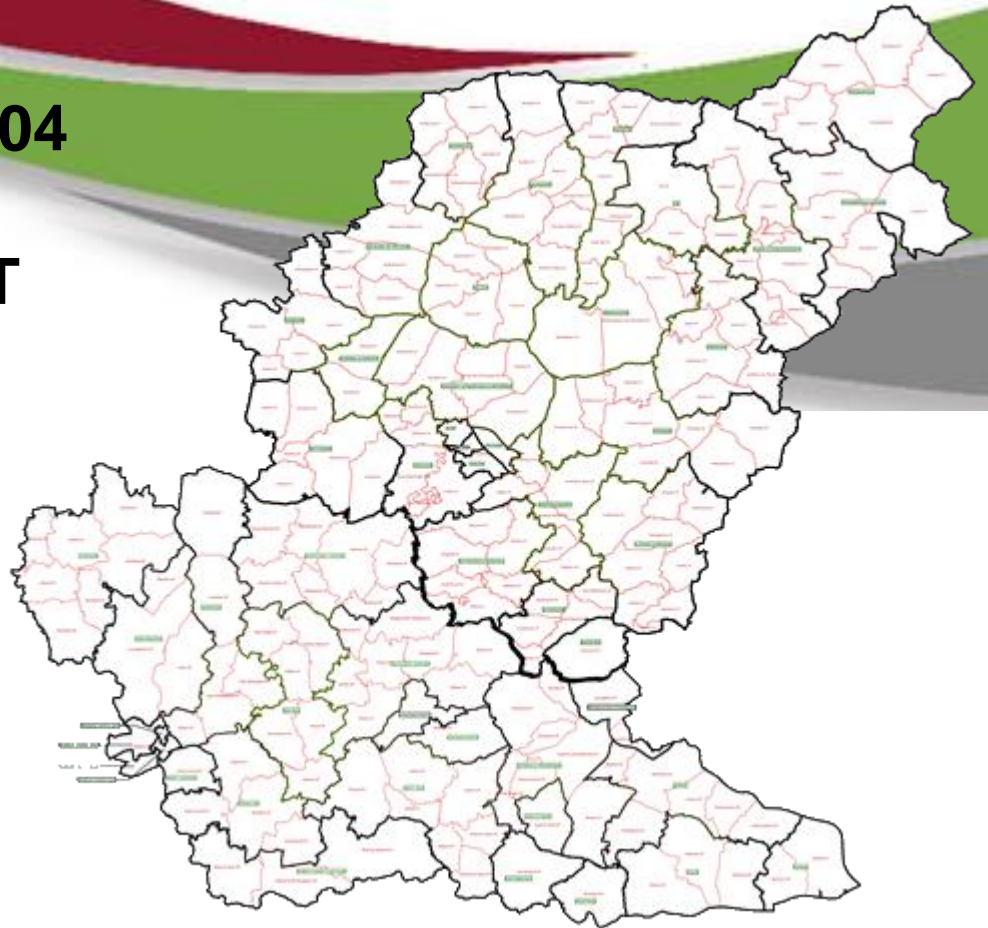
Restrict the height of the proposal to 1- 1.5 storey dwelling only.

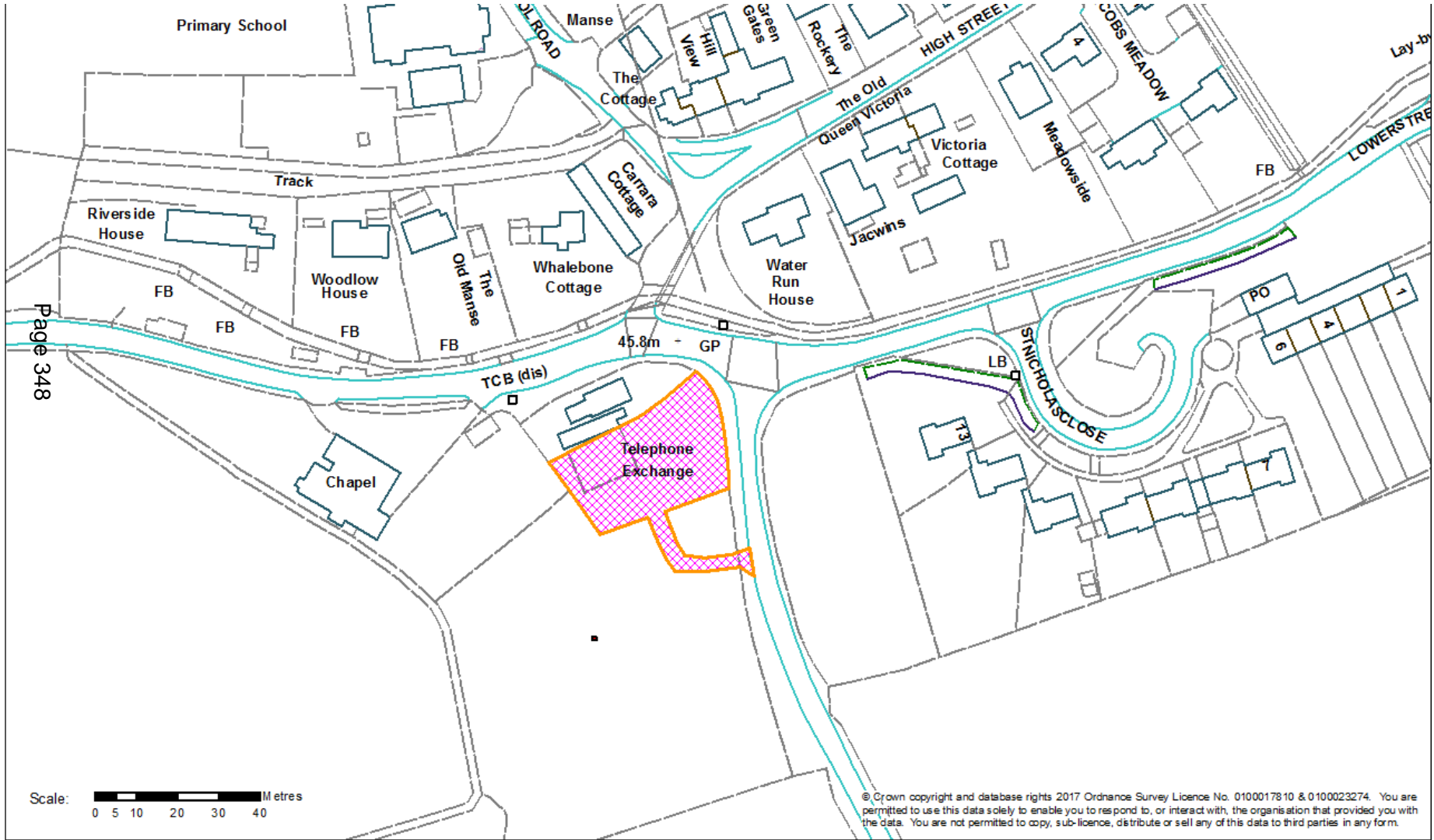
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**Application No: DC/19/01604**

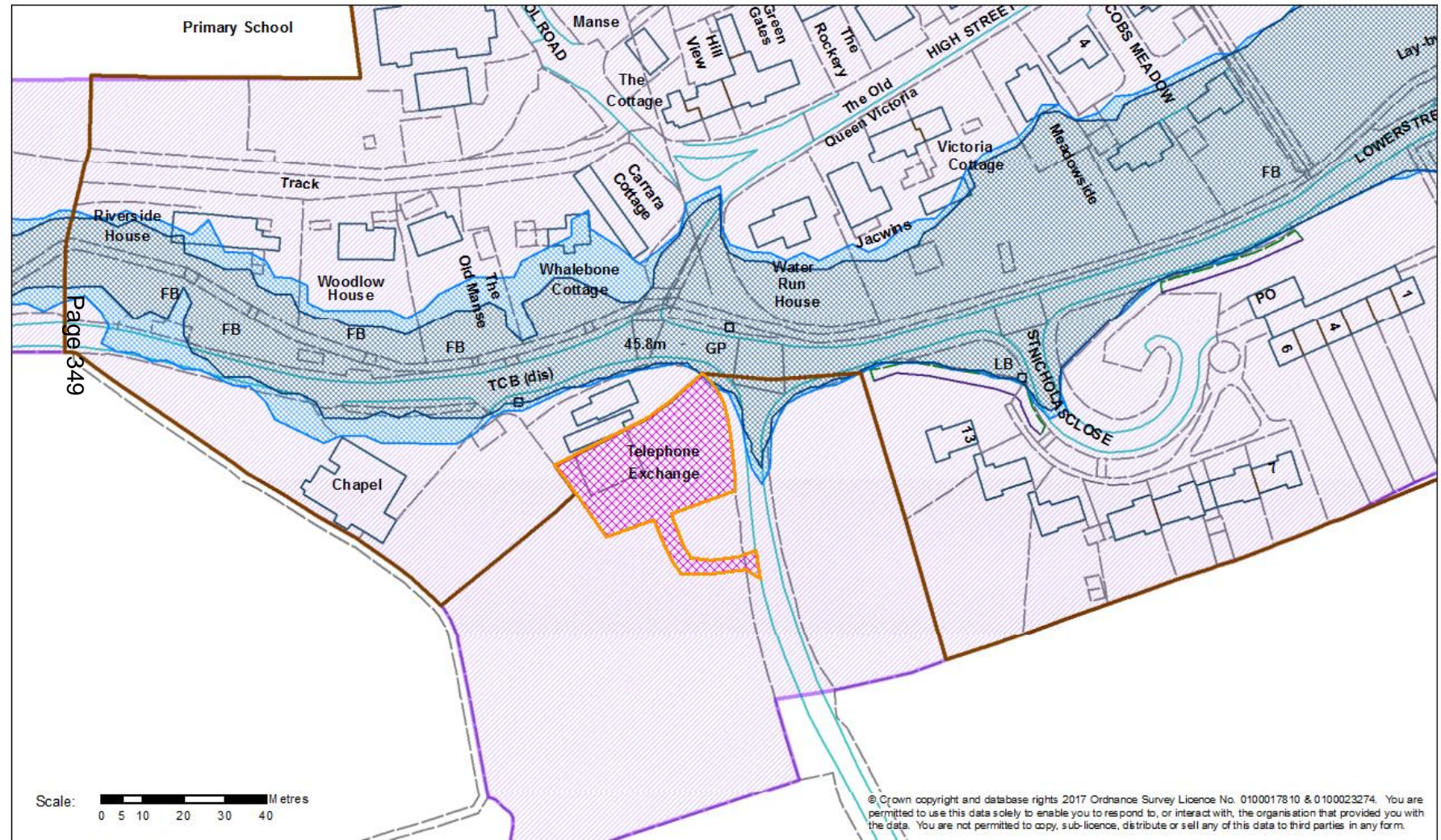
**Address: Land Adjacent BT  
Exchange, Rising Sun Hill  
Rattlesden**





# Constraints Map

- Flood Zone 2
- Flood Zone 3
- Built Up Area Boundaries
- Conservation Area



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# Aerial Map

Slide 4



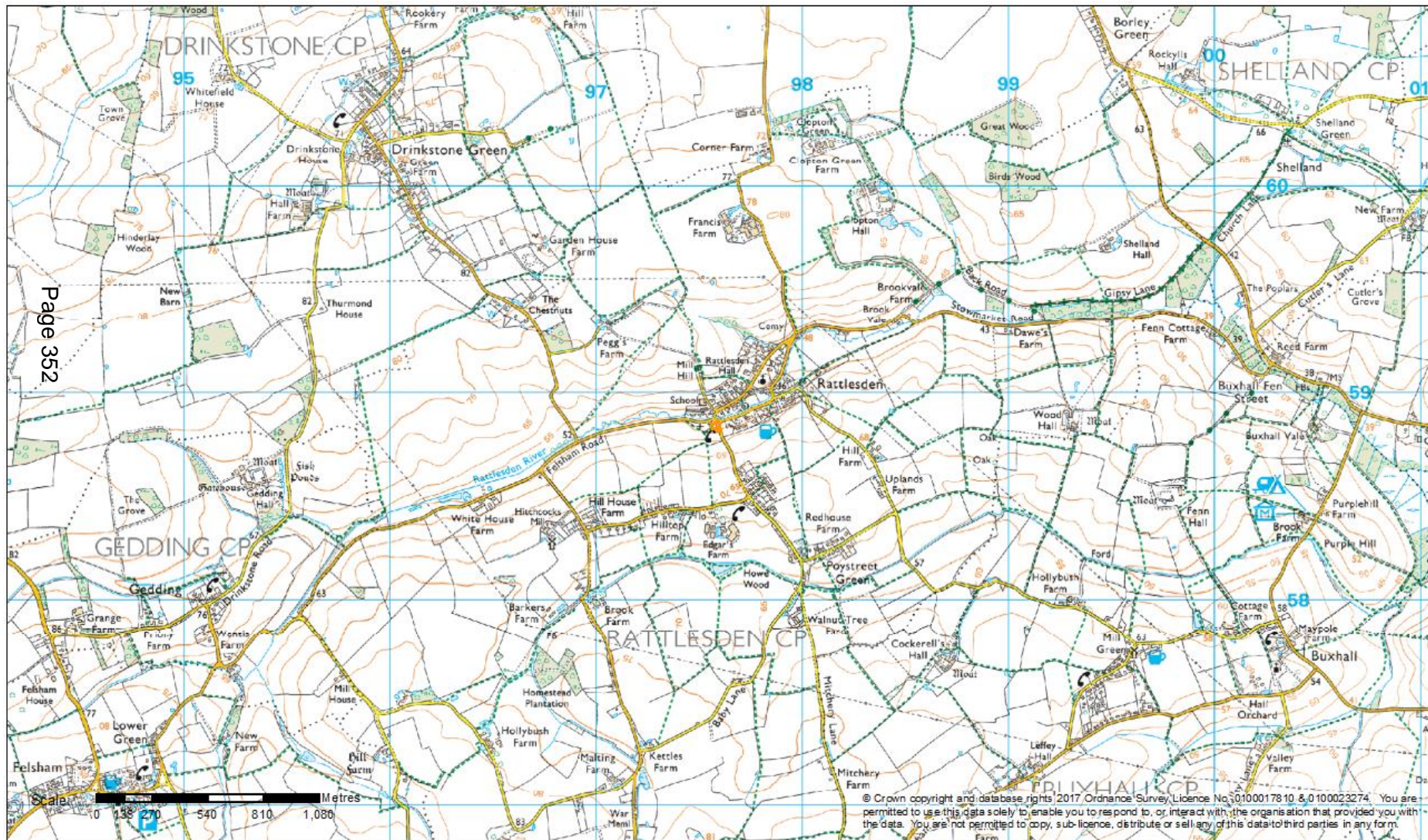
Page 350



# Aerial Map

Page 351





## Site Layout

Slide 7



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## MEMBER REFERRAL TO COMMITTEE

(Completed form to be sent to Case Officer and Corporate Manager – Growth & Sustainable Planning)

Planning application reference	DC/19/01604
Parish	RATTLESDEN
Member making request	PENNY OTTON
Please describe the significant policy, consistency or material considerations which make a decision on the application of more than local significance	<p>Is outside the settlement area. The council now has a 5 year land supply</p> <p>Original approval included conditions</p> <p>12 ;removal of permitted development rights</p> <p>H38; safeguarding character of conservation area</p> <p>RT12; safeguarding footpaths and bridleways</p> <p>CL8; protecting wildlife habitats</p>
Please detail the clear and substantial planning reasons for requesting a referral	<p>Lack of securing a S106 agreement on the garden area for the primary school.</p> <p>The cumulative effect of number of vehicle movements as a result of numerous approvals and current applications.</p> <p>Impact on junction of rising sun hill and lower road/Felsham road.</p> <p>Whilst not in the conservation area will have an impact on the opposite conservation area and the extension to the chapel</p>
Please detail the wider District and public interest in the application	The former application was give approval by the parish due to the promised community nature garden area and extension to the chapel
If the application is not in your Ward please describe the very significant impacts upon your Ward which might arise from the development	N/A

<p>Please confirm what steps you have taken to discuss a referral to committee with the case officer</p>	<p>I have spoken in depth to the planning officer</p>
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# Consultee Comments for Planning Application DC/19/01604

## Application Summary

Application Number: DC/19/01604

Address: Land Adjacent BT Exchange Rising Sun Hill Rattlesden Suffolk IP30 0RL

Proposal: Outline Planning Application (Access to be considered) - Erection of 1no. dwelling and garage.

Case Officer: Jamie Edwards

## Consultee Details

Name: Mr Doug Reed (Parish Clerk, Rattlesden Parish Council)

Address: Second Thoughts, Church Road, Elmswell Bury St Edmunds, Suffolk IP30 9DY

Email: rattlesdenpc@live.co.uk

On Behalf Of: Rattlesden Parish Clerk

## Comments

Rattlesden Parish Council OBJECTS to this application.

The previous application (2194/16) for this critical site within the heart of the village - a designated Conservation Area - provided for a nature garden for the nearby Primary School at this location. While the Parish Council was less than keen on a housing development which was outside the settlement boundary, it recognised the significant benefits which would accrue to the School and also that a nature garden was not only consistent with its green agenda but also would majorly enhance the attractiveness of the site. Accordingly, it was pleased to support the application.

DC/19/01604 is self-evidently a superseding application which, if granted, offers only disbenefits for the centre of the village. Clearly, for whatever reason, the nature garden was not progressed. That is a genuine loss to Rattlesden but was fundamental and key to the original application being acceptable. This 'replacement' application (albeit through a different applicant) offers nothing on the site to the village and is, simply, a further example of creeping overdevelopment which is totally unacceptable. It would not be unreasonable to suggest to say that the Parish Council, on behalf of the village, feels completely misled by how the present position has come about.

The application claims that the proposed shared access will have "no material impact on highway safety". That is extremely questionable. Since the access was provided for by application 2914/16 the traffic situation has been subject to overwhelming change. There have been major developments in the village on Top Road and on land adjacent to Roman Rise - both immediately beyond the site represented by this application. Not only the applicant but also, and crucially, Suffolk Highways must recognise and take this change into proper account.

The 22 dwellings as per DC/18/00229 (land adjacent to Roman Rise) and eight dwellings as per

DC/18/02258 (Top Road) will both impact negatively upon minor, narrow roads which are already over-burdened and unable to cope with the current volumes of traffic. Both will feed substantially increased traffic movements through their obvious and main access road - Rising Sun Hill - the very route on to which this latest application would provide for egress/access. So there must be an impact from this proposal. Moreover, all routes lead to a tiny but remarkably busy junction at the bottom of Rising Sun Hill where visibility is a pre-existing problem - and which is the main access road to the local school and where not only parents park at busy school times but also school buses (as there is no alternative site). The health and safety risks cannot be over-emphasised.

From: Doug Reed <[rattlesdenpc@live.co.uk](mailto:rattlesdenpc@live.co.uk)>  
Sent: 01 May 2019 15:54  
To: Jamie Edwards <[Jamie.Edwards@babberghmidsuffolk.gov.uk](mailto:Jamie.Edwards@babberghmidsuffolk.gov.uk)>  
Subject: DC/19/01604 - Rattlesden - Rising Sun Hill Planning Application

Mr Edwards, good afternoon

I submitted Rattlesden Parish Council comments on-line about DC/19/01604 earlier today but, from the detailed discussion yesterday evening, missed a couple of points which I hope you might be able to include as an addendum, please. They are as below.

Kind regards.

Doug Reed  
Parish Clerk  
Rattlesden Parish Council

Firstly, the design of the original dwellings was considered particularly suitable and was, together with the graveyard extension and nature garden, critical to Parish Council support (i.e. designed to look like a farmhouse and associated buildings - very much in keeping with the location). It is appreciated that no design is offered within the present application but that also precludes Parish Council support in this key site.

Secondly, re highways. The earlier Parish Council comments inadvertently did not account for the impact of the site directly opposite on Rising Sun Hill which was also agreed subsequently and which, itself, has access on to Rising Sun Hill - necessarily in conflict with the access to be achieved for the proposed application. The two together will create congestion on a busy/dangerous stretch of road which has significant pedestrian activity.

**From:** Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>  
**Sent:** 05 April 2019 07:02  
**To:** Jamie Edwards <Jamie.Edwards@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Subject:** DC/19/01604

EP Ref: WK/000257827

DC/19/01604 | Outline Planning Application (Access to be considered) - Erection of 1no. dwelling and garage. | Land Adjacent BT Exchange Rising Sun Hill Rattlesden Suffolk IP30 ORL

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*

9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

*Andy*

**Andy Rutson-Edwards**, MCIEH AMIOA  
Senior Environmental Protection Officer

**Babergh and Mid Suffolk District Council - Working Together**

Tel: 01449 724727

Email [andy.rutson-edwards@baberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@baberghmidsuffolk.gov.uk)

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**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: Jamie Edwards

Dear Jamie

**TOWN AND COUNTRY PLANNING ACT 1990**

**CONSULTATION RETURN: DC/19/01604**

**PROPOSAL:** Outline Planning Application (Access to be considered) - Erection of 1no. dwelling and garage.

**LOCATION:** Land Adjacent BT Exchange Rising Sun Hill Rattlesden Suffolk IP30 0RL

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

Condition: The vehicular access shall be laid out and completed in all respects in accordance with Drawing No. DM01 and with an entrance width of 4.5m and made available for use prior to occupation.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the



development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

Condition: The gradient of the vehicular access shall not be steeper than 1 in 20 for the first five metres measured from the nearside edge of the adjacent metalled carriageway.

Reason: To ensure that vehicles can enter and leave the public highway in a safe manner.

Condition: The access driveway shall be constructed at a gradient not steeper than 1 in 8.

Reason: To ensure that vehicles can enter and leave the public highway in a safe manner.

Condition: Prior to the dwellings hereby permitted being first occupied, the vehicular access onto the highway shall be properly surfaced with a bound material for a minimum distance of 10 metres from the edge of the metalled carriageway, in accordance with details previously submitted to and approved in writing by the local planning authority.

Reason: To secure appropriate improvements to the vehicular access in the interests of highway safety.

Condition: The vehicular access hereby permitted shall be a minimum width of 4.5 metres for a distance of 10 metres measured from the nearby edge of the carriageway.

Reason: To ensure vehicles can enter and leave the site in a safe manner.

Condition: Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 90 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension).

Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense.

The County Council's Central Area Manager must be contacted on Telephone: 01473 341414. Further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>

A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

Yours sincerely,

**Kyle Porter**  
**Development Management Technician**  
Growth, Highways and Infrastructure



25 April 2019

Jamie Edwards  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

Dear Jamie,

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** DC/19/01604  
**Location:** Land Adjacent BT Exchange, Rising Sun Hill, Rattlesden, Suffolk IP30 0RL  
**Proposal:** Outline Planning Application (Access to be considered) - Erection of 1no. dwelling and garage.

Thank you consulting Place Services on the above application.

**No objection subject to securing biodiversity mitigation and enhancement measures**

**Summary**

We have reviewed the Ecological Scoping Survey (Hiller Ecology Ltd., February 2016) submitted by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

We also support the reasonable biodiversity enhancements, which should also be secured by a condition of any consent. However, we recommend that any new landscaping should comprise of native species only as defined in Schedules 2 and 3 of the Hedgerow Regulations 1997. The loss of the small section of hedgerow removed to facilitate the site access should also be appropriately compensated proportionately within the landscape design.



This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

**Recommended conditions:**

**1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**

*“All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Ecological Scoping Survey (Hiller Ecology Ltd., February 2016) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

*This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”*

**Reason:** To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

**2. PRIOR TO OCCUPATION: BIODIVERSITY ENHANCEMENT STRATEGY**

*“A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority, following the recommendations of the Ecological Scoping Survey (Hiller Ecology Ltd., February 2016)*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.”*

**Reason:** To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).



Please contact me with any queries.

Yours sincerely,

**Hamish Jackson BSc (Hons) GradCIEEM MRSB**

Junior Ecological Consultant

[ecology.placeservices@essex.gov.uk](mailto:ecology.placeservices@essex.gov.uk)

**Place Services provide ecological advice on behalf of Mid Suffolk District Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/19/01604 Land Adjacent BT Exchange, Rising Sun Hill, Rattlesden	
<b>2</b>	<b>Date of Response</b>	25/04/19	
<b>3</b>	<b>Responding Officer</b>	Name:	Karolien Yperman
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
<b>4</b>	<b>Summary and Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	Based on the limited amount of information included with this outline application, the Heritage Team considers that the erection of a dwelling and garage on this site would likely cause no harm to the character and appearance of the Rattlesden Conservation Area, subject to matters of layout, scale, massing, design, use of materials and boundary treatment.	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>This is an outline application for the erection of a dwelling and garage in the Rattlesden Conservation Area. The heritage concern relates to the impact of the proposal on the character and appearance of the Conservation Area.</p> <p>The site is located at the south-western corner of the Rattlesden Conservation Area. The application site forms part of a larger field, which was the subject of a previous application (2194/16). In this application for the erection of two dwellings on this land, the current application site was designated as a nature garden for the local primary school. The Heritage Team commented on the previous application that the proposed development would change the character of the land, however not to the detriment of the Conservation Area, subject to conditions.</p> <p>Within the context of the previously granted application, as well as the granted outline application for 5 dwellings on the east side of Rising Sun Hill, the current application site contributes little to the Conservation Area, and while the erection of a dwelling would change the character of the land, it is unlikely that this development would cause harm to the character and appearance of the Conservation Area. This would be subject to appropriate layout, scale, massing, design,</p>	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

		use of materials and boundary treatment at reserved matters stage.
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	<p><i>Decision-takers should be mindful of the specific legal duties of the local planning authority with respect to the special attention which shall be paid to the desirability of preserving or enhancing the character and appearance of the Conservation Area, as set out in section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</i></p>
7	<b>Recommended conditions</b>	

Please note that this form can be submitted electronically on the Council's website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Council's website and available to view by the public.

# Comments for Planning Application DC/19/01604

## Application Summary

Application Number: DC/19/01604

Address: Land Adjacent BT Exchange Rising Sun Hill Rattlesden Suffolk IP30 0RL

Proposal: Outline Planning Application (Access to be considered) - Erection of 1no. dwelling and garage.

Case Officer: Jamie Edwards

## Customer Details

Name: Mr Robert Boardman

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds, Suffolk IP30 9ET

## Comment Details

Commenter Type: Amenity Group

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Boundary Issues

Comment: It appears that footpath no. 58 runs within part of the western boundary of this site. It is not clear from these plans as to what provision has been made for this path to continue along its route as per the definitive map and statement for the parish of Rattlesden.

Bob Boardman, Stowmarket Ramblers, footpath secretary