

Consultee Comments for Planning Application DC/18/00229

Application Summary

Application Number: DC/18/00229

Address: Land Adjacent Roman Rise Rattlesden IP30 0QY

Proposal: Outline Planning Application(with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space .

Case Officer: John Pateman-Gee

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 above view is based upon the many comments and concerns about this application, derived from two heavily-attended open meetings in the village, a significant amount of correspondence and recently-held Parish Council meetings. It is vital that the Council properly represents and supports those resident views - hence the objection.

In taking this position, the Council is mindful of the effort expended by the applicants in seeking to inform and consult residents about the proposals. However, despite the fact that the applicants sought early engagement with the village to identify public concerns, it is felt that they have not adequately addressed the issues raised and this would seem to be reinforced by the comments from other key consultees such as Suffolk Highways, Anglia Water and Suffolk County Council, Flood and Water Management.

In particular, the Council would highlight the following:

Drainage/Surface Water/Flooding/Sewerage: it is vital, given the Rattlesden geography and environment with attendant water, flooding and drainage problems, that absolute provision is made to deal with all issues relating to water. The documents accompanying the application seek to offer reassurances yet their proposed solutions neither suggest improvements to the drainage system in that area nor offer any real assurance that the proposed pond will be adequate to deal with the worst rainfall excesses. There is no evidence of any positive engagement and collaboration with appropriate bodies to provide for a full and proper resolution of this serious problems of drainage, surface water/flooding and sewerage such that the application fails to

deliver plans that are fit for purpose in relation to water and foul sewerage management. Rattlesden has an especially unfortunate history and geography in relation to the management of these matters and it is absolutely essential that any new development not only did not exacerbate the problems but also delivered creative and pragmatic solutions which might enhance the area. This application fails in that regard.

Traffic Management: issues with regard to vehicle movements were pre-eminent during the consultation process and the Council would continue to echo the anxieties of residents. Road configurations not only in the immediate locality but also in and around the village generally, are problematic to say the least. HGVs are increasing in number on small roads which cannot accommodate such traffic. The Council has repeatedly sought the help of Suffolk Highways to mitigate the risks posed by such vehicles whilst also engaging with Suffolk Constabulary but the situation is worsening. The extra vehicle movements from this proposed development would have a very real negative impact upon an already inadequate and stressed road infrastructure. Yet numbers alone are not indicative of the seriousness of the situation. Traffic incidents are not infrequent and worries about safety are, therefore, paramount and need to be addressed effectively. It is felt that they have not been and serious concerns remain, in particular about the essential need to provide for the safety of children seeking to access the School. It is worth emphasising that the traffic survey carried out by the applicants was undertaken in the summer when, due to holidays for example, vehicle movements would have been less than usual and so the results should be viewed with caution as they would not properly represent the problems faced at most times of the year.

Access: The Council would support the views expressed by Suffolk Highways and is against the two accesses proposed as these would be problematic for vehicles seeking to get in and out of a narrow village road which has existing safety issues.

Local Services: There are major worries about the impact such a development would have on already pressurised facilities such as the School and local health centre (in Woolpit). There is an argument that additional housing will result in potential benefits to the local economy but Rattlesden is a small village with just a Community Shop/Post Office. The real impact would be on vital GP surgeries and school places with attendant transport worries. Beyond primary school, youngsters need to access education outside the village when school transport (and indeed rural transport generally) is being cut.

Footpaths: where these are made available, they should be finished properly and comprehensively.

Joint Local Plan: the land in question has not been earmarked for development within the Plan.

Your Ref: DC/18/00229
Our Ref: 570\CON\0285\18
Date: 7th February 2018

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

Email: planningadmin@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: John Pateman-Gee

Dear John

TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN DC/18/00229

PROPOSAL: Outline Planning Application(with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space

LOCATION: Land Adjacent, Roman Rise, Rattlesden, IP30 0QY

ROAD CLASS:

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

1. The proposed visibility splays for the development are not sufficient for safe vehicular access. The required visibility splays for a 30mph speed limit are $x=2.4m$ and $y=90m$, as standards in the Design Manual for Roads and Bridges. If the site cannot achieve the required standards in some cases a speed survey may provide acceptable evidence of actual speeds to enable a lower standard of visibility to be accepted. Providing insufficient visibility of approaching vehicles and pedestrians for drivers emerging from an access is an unacceptable risk, and in most cases will result in a recommendation of refusal of planning permission.
2. For this size of development, we would prefer a single access onto the highway rather than the 2 proposed. This concentrates turning movements at a single point on the road and reduces the hazard.

Once suitably revised drawings are received, and a formal highway approval is appropriate, then there may be Section 106 highway requirements for Bus Stop and Public Rights of Way network improvements

Yours sincerely,

Sam Harvey
Senior Development Management Engineer
Strategic Development

Your ref: DC/18/00229/OUT
Our ref: Rattlesden – land adjacent to Roman
Rise 00053574
Date: 02 February 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Mr John Pateman-Gee,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear John,

Rattlesden: land adjacent to Roman Rise – developer contributions

I refer to the proposal: outline planning application (with some matters reserved) hybrid planning application comprising (i) outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space.

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.

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

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, 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 which is implemented on planning permissions granted from 11th 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

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.

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.** Refer to the NPPF paragraph 72 which 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.'

SCC anticipates the following **minimum** pupil yields from a development of 22 dwellings, namely:

- a. Primary school age range, 5-11: 6 pupils. Cost per place is £12,181 (2017/18 costs).
- b. Secondary school age range, 11-16: 4 pupils. Cost per place is £18,355 (2017/18 costs).
- c. Secondary school age range, 16+: 1 pupil. Costs per place is £19,907 (2017/18 costs).

The local catchment schools are Rattlesden Church of England Primary Academy, Thurston Community College, and Ixworth Free School.

Based on existing forecasts SCC will have surplus places available at the catchment schools.

- 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.

From these development proposals SCC would anticipate up to 3 pre-school children arising, at a cost of £8,333 per place.

This development proposal falls within the ward of Rattlesden and there is a predicted deficit of 37 places in September 2017. Therefore, the 3 children arising from this development will require funding of £24,999, which will be secured via a future CIL funding bid.

3. **Play space provision.** Consideration will need to be given to adequate play space provision. 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 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a 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.

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.** 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. £4,752, 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. Refer to the NPPF 'Section 8 Promoting healthy communities'.
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.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic population. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, SCC 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 local planning authority's housing team to identify local housing needs.
- 8. 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 planning applications:

“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 through the use of planning conditions or planning obligations 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. 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.** Refer to the NPPF paragraphs 42 – 43. 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.

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.

I will be grateful if the above information can be provided to the decision-taker in respect of this planning application.

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

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

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich IP1 2BX

Enquiries to: Rachael Abraham
Direct Line: 01284 741232
Email: Rachael.abraham@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_00229
Date: 5th February 2018

For the Attention of John Pateman-Gee

Dear Mr Isbell

**Planning Application DC/18/00229– Land adjacent Roman Rise, Rattlesden:
Archaeology**

The proposed development lies in an area of high archaeological potential recorded on the County Historic Environment Record and its location between two rivers and on light soils makes it a favourable site for archaeological activity from all periods. A length of Roman road is believed to run either along the edge, or close to, the proposed development site (RAT 012) and extensive multi-period finds scatters have been recorded in the immediate vicinity (RAT 004, 019, 046, 047, 048, Misc). As a result, 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.

Given the high potential, lack of previous investigation and large size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should below-ground heritage assets of significance be identified, will be based upon the results of the evaluation.

In order to establish the archaeological potential of the site, a geophysical survey will be required in the first instance. The geophysical survey results will be used to make a decision on the timing and extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as part of any planning application for this site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:

<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

Subject:FW: DC/18/00229 Land Adjacent Roman Rise Rattlesden- archaeology

From: Rachael Abraham

Sent: 21 March 2018 14:19

To: John Pateman-Gee <John.pateman-Gee@baberghmidsuffolk.gov.uk>

Subject: RE: DC/18/00229 Land Adjacent Roman Rise Rattlesden- archaeology

Dear John,

The line of a Roman Road is believed to run down the eastern edge of the red line site boundary plan submitted with the planning application and if Roman remains associated with the road are present, these would be likely to extend back across the area of the housing. Finds scatters indicate the presence of below ground archaeological remains within the vicinity, as finds do move over time as a result of ploughing etc. As such this site does have high below ground potential, however, as this development area has yet to be subject to systematic archaeological investigation, we don't currently have sufficient information to determine whether there are surviving below ground remains here which will be impacted upon as part of the scheme. It is worth highlighting that an absence of records is not a record of absence.

The request for up front assessment is based upon current available information from the developers.

If the developer is able to provide us with further information regarding proposed groundworks in the area of open space e.g. whether there will be a site strip/ landscaping, the depth of disturbance associated with planting and allotment areas etc as shown on the site layout plan and whether there will be any services or any compounds located in this area, we would be happy to review this.

Best wishes,

Rachael

Rachael Abraham B.A. (Hons), M.A.

Senior Archaeological Officer

Suffolk County Council Archaeological Service,
Bury Resource Centre,
Hollow Road,
Bury St Edmunds,
IP32 7AY

Tel.:01284 741232

Mob: 07595 089516

Email: rachael.abraham@suffolk.gov.uk

Website: <http://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/>

Suffolk Heritage Explorer: www.heritage.suffolk.gov.uk

Twitter Page: www.twitter.com/SCCArchaeology

From: John Pateman-Gee

Sent: 21 March 2018 13:53

To: Rachael Abraham <Rachael.Abraham@suffolk.gov.uk>; Jason Skilton
<Jason.Skilton@suffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

Subject: DC/18/00229 Land Adjacent Roman Rise Rattlesden

DC/18/00229

Land Adjacent Roman Rise

Rattlesden

IP30 0QY

Hybrid planning application comprising (i) Outline planning application (All matters reserved except for access) for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space .

Dear all,

Thank you for your responses. I have had a meeting with the applicant and I find myself with some questions on this application that I am hoping you will help with.

Highways

1. The transport assessment includes speed survey and relevant data to suggest a reduction of visibility splay would be acceptable. Was this taken into account in the current refusal recommend received on poor visibility?
2. The highways authority wishes to resist two access points, but I am not clear as to why or what standard/policy this would be based on if I had to defend an appeal on this basis?

Archaeology

1. The site for housing is not on the roman road or includes any land in relation to the scatter finds. The site area is large, but two thirds would remain as open space and shall be secured as undisturbed land. On this basis is an upfront assessment including trenches etc required?

Flood

1. The Swall is close by to the site and is proposed to deal with the infiltration issues, it is not clear why this is not sufficient to resolve the holding objection and all land is in controlled ownership. What is outstanding and how to explain this in easy steps to the applicant?

Help appreciated as I would like to get this to committee soon.

Regards,

John Pateman-Gee

Area Planning Manager

Development Management Services - Economy

Tel: 07860 827036 Direct Mob

Tel: 0300 1234000 For all Council services

Email: John.Pateman-Gee@BaberghMidSuffolk.gov.uk

Web: www.babergh.gov.uk or www.midsuffolk.gov.uk

Based at Endeavour House, 8 Russell Road, Ipswich IP1 2BX. We have two new customer access points:

- **Stowmarket ([54 Ipswich Street, IP14 1AD](#)) Monday - Thursday, from 9.00am - 5.00pm, or Friday, from 9.00am - 4.30pm**
- **Sudbury ([Town Hall, Old Market Place, CO10 1TL](#)) Monday - Thursday, from 9.00am - 12.30pm and from 1.30pm - 5.00pm, or Friday, from 9.00am - 12.30pm and from 1.30pm - 4.30pm.**

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 that can be found on the Council's website.

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: 31 January 2018

Planning Ref: DC/18/00229

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land adjacent Roman Rise, Rattlesden IP30 0QY
DESCRIPTION: 22 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

OFFICIAL

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/F221388
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 31/01/2018

Dear Sirs

Land adjacent Roman Rise, Rattlesden IP30 0QY
Planning Application No: DC/18/00229

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

Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr P Cobbold Planning Ltd, 42 Beatrice Avenue, Felixstowe IP11 9HB
Enc: Sprinkler information

From:RM Floods Planning
Sent:Tue, 13 Feb 2018 10:00:00 +0000
To:BMSDC Planning Area Team Yellow
Cc:John Pateman-Gee
Subject:2018-02-13 JS Reply Land Adjacent Roman Rise, Rattlesden, IP30 0QY Ref DC/18/00229

Dear John Pateman-Gee,

Subject: Land Adjacent Roman Rise, Rattlesden, IP30 0QY Ref DC/18/00229

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/00229.

The following submitted documents have been reviewed and we recommend **maintaining our holding objection** at this time:

- Site Location Plan
- Indicative Site Layout Plan Ref 4217 01
- Preliminary Flood Risk Assessment & Drainage Strategy (including appendices) Ref SR451
- Preliminary Site Investigation report

The reason why we are recommending maintaining our holding objection is because the applicant has not address all our previous comments of the 29th January 2018. We do note that infiltration testing has been carried out and was unsuccessful.

Please refer to previous consultation response.

Kind Regards

Jason Skilton

Flood & Water Engineer, Flood & Water Management

Growth, Highways and Infrastructure

From:RM Floods Planning
Sent:Mon, 29 Jan 2018 08:19:17 +0000
To:BMSDC Planning Area Team Yellow
Cc:John Pateman-Gee
Subject:2018-01-29 JS Rely Land Adjacent Roman Rise, Rattlesden, IP30 0QY, Ref DC/18/00229

Dear John Pateman-Gee,

Subject: Land Adjacent Roman Rise, Rattlesden, IP30 0QY, Ref DC/18/00229

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/00229.

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Site Location Plan
- Indicative Site Layout Plan Ref 4217 01
- Preliminary Flood Risk Assessment & Drainage Strategy (including appendices) Ref SR451

The reason why we are recommending a holding objection is because whilst the applicant has suggest a means of draining the site, it is by far a simple arrangement. The proposed system relies on holding the water in a series of detention basins located onsite and offsite prior to discharging to a watercourse. It is not clear why a) one of the detention basins is proposed outside of the development area and b) there is a 1km+ length of pipe connecting it rather than an open channel like a swale. It is noted that this proposed solution is the only viable solution.

The applicant will need to demonstrate that the roadside watercourse that the proposed discharge into has a positive flow and does flow into a OS mapped watercourse.

It is noted that the applicant in the FRA states that infiltration test have been carried out by Hartog Hutton, but no evidence of these test has been submitted with the applicant.

The points below detail the action required in order to overcome our current objection:-

1. Submit infiltration test results to BRE Digest 365

2. Evidence that the watercourse that they proposed to discharge into flow to a mapped watercourse
3. Evidence that the discharge point is with the applicant ownership or that they have an agreement in principle for this discharge point

Documents required to be submitted with each type of application should be as per the following table*

Pre-app	Outline	Full	Reserved Matters	Discharge of Conditions	Document Submitted
✓	✓	✓	■	■	Flood Risk Assessment/Statement (Checklist)
	✓	✓			Drainage Strategy/Statement & sketch layout plan (checklist)
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of 3rd party agreement to discharge to their system (in principle/consent to discharge)
		✓		✓	Maintenance program and ongoing maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration test results (BRE365)
		✓	✓	✓	Detailed landscape details
		✓	✓	✓	Discharge agreements (temporary & permanent)
		✓	✓	✓	Development management & construction phasing plan

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

Website: www.suffolk.gov.uk

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

From: planningyellow@baberghmidsuffolk.gov.uk [mailto:planningyellow@baberghmidsuffolk.gov.uk]

Sent: 24 January 2018 08:52

To: RM Floods Planning <floods.planning@suffolk.gov.uk>

Subject: MSDC Planning Consultation Request - DC/18/00229

Please find attached planning consultation request letter relating to planning application - DC/18/00229
- Land Adjacent Roman Rise, Rattlesden, IP30 0QY,

Kind Regards

Planning Support Team

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Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00026093
Local Planning Authority:	Mid Suffolk District
Site:	Land Adjacent Roman Rise, Rattlesden
Proposal:	Outline Planning Application (with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space
Planning Application:	DC/18/00229

Prepared by: Pre-Development Team

Date: 16 February 2018

If you would like to discuss any of the points in this document please contact me on 0345 606 6087 or email 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 Rattlesden Workhouse LN 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 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.

Section 5 – Trade Effluent

- 5.1 Not applicable
-

From:Nathan Pittam
Sent:Fri, 9 Feb 2018 10:36:26 +0000
To:John Pateman-Gee
Cc:BMSDC Planning Area Team Yellow
Subject:DC/18/00229: EH - Land Contamination

Dear John

EP Reference : 237013

DC/18/00229: EH - Land Contamination

Land Adjacent, Roman Rise, Rattlesden, BURY ST EDMUNDS, Suffolk.

Outline Planning Application(with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) etc

Many thanks for your request for comments in relation to the above application. Having reviewed the application I note that the applicant has not supplied any information to demonstrate that the site is suitable for the proposed end use from the perspective of land contamination. For the development of this scale we require the applicant to submit a BS10175 compliant Phase I investigation. Without this information I would be minded to recommend that the application is refused on the grounds of insufficient information.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

From:Iain Farquharson
Sent:4 Apr 2018 10:10:33 +0100
To:BMSDC Planning Area Team Yellow
Subject:M3 237017: MSDC Planning Consultation Request - DC/18/00229

Dear Sir/Madam

This department has reviewed the application and we have no objection however we request that a condition be included should permission be granted to ensure the properties are as sustainable as possible. Our suggested condition wording is:

Before any development is commenced 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 construction commences.

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

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

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

From: planningyellow@baberghmidsuffolk.gov.uk <planningyellow@baberghmidsuffolk.gov.uk>
Sent: 24 January 2018 08:53
To: Environmental Health <Environmental@baberghmidsuffolk.gov.uk>
Subject: MSDC Planning Consultation Request - DC/18/00229

Please find attached planning consultation request letter relating to planning application - DC/18/00229 - Land Adjacent Roman Rise, Rattlesden, IP30 0QY,

Kind Regards

Planning Support Team

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Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH



T: 0333 013 6840
www.placeservices.co.uk
@PlaceServices

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

23/02/2018

For the attention of: John Pateman-Gee

Ref: DC/18/00229; Land Adjacent Roman Rise, Rattlesden, IP30 0QY,

Thank you for consulting us on the outline planning application (with some matters reserved) for this hybrid planning application comprising (i) Outline planning application for the erection of 22 no. dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space.

This letter sets out our consultation response regarding the landscape impact of the planning application and how the proposal relates and responds to the surrounding landscape setting and context of the site.

Recommendations

The main development constraint is the requirement to protect and enhance the existing landscape character. In terms of the likely visual impact, the proposal will have a significant impact on the rural character of Rattlesden. We would therefore advise the following recommendations:

1. We recommend a landscape plan is submitted before approval. Currently the layout plan shows no differentiation between existing and proposed trees, the swale is not located on the plan and no differentiation has been given between soft landscape features (i.e. shrubs, grasses and herbaceous plants).
2. The Landscape Plan should be accompanied by a landscape strategy. Details should include: a soft landscaping strategy, hard landscaping specification, boundary treatments, proposed visuals and public open space details.
3. If approved, we would recommend a detailed boundary treatment plan is submitted as part of a planning condition. This should detail both hard and soft landscape boundary treatments and accompanied construction details.
4. If the outline application is approved, a detailed landscape planting plan, landscape maintenance plan and specification will need to be submitted. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as the swale and attenuation basins should also be included in the landscape management plan to ensure appropriate management is carried out and to maintain functionality as well as aesthetic.



The proposal

The proposed application is for 22no. dwellings accompanied by a large expanse of public open space. The proposed development is bound on three sides by housing and aims to fit into the existing residential settlement. The east of the application site is bound by agricultural land and grassland, In contrast, the western edge is adjacent to a row of dwellings. The site is located off Rising Sun Hill road, and is offset from the centre of Rattlesden. Due to this, landscape character is important, and should be protected and enhanced where possible.

In terms of change of land use, the change of the use appears to be supported by the needs of the extension of the residential settlement through part (i) of this application. This is because green space provision and access is key for a community of people, serving leisure, social and health benefits.

The Suffolk Landscape Character Assessment identifies the site as being part of the Ancient Rolling Farmlands landscape character area (LCA). Some of the key characteristics of this LCA include:

- Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees.
- Scattered with ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly.
- Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of mediaeval origin.
- Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs are frequently tiled, though thatched houses can be locally significant.

Because of this, we would advise that the landscape proposal takes the native character of the planting species' into consideration and aims to incorporate woodland parcels where possible. This will help enhance the landscape character, but also aid green infrastructure in the wider area.

Review on the submitted information

In terms of landscape, the submitted application includes a design and access statement (DAS) as part of the planning statement, and an indicative site layout plan.

The DAS identifies the relationship between the existing and proposed developments and gives appropriate design details about the settlement and architectural vernacular. In terms of landscape, little detail is given. Therefore it would be advised that a landscape strategy is submitted before approval. This should include details on soft landscaping, hard landscaping specification, boundary treatments and public open space. This should be presented through precedent images, descriptive text and visuals.

The indicative site layout plan mimics the existing layout by proposing two cul-de-sac type arrangements of housing with access from the main road. Public open space comprises of allotments, an attenuation basin, and a sports pitch. However no LEAP/LAPs have been suggested. The proposal currently provides a rich buffer zone between the existing and proposed residential development and the rural character eastward. However the eastern boundary would benefit from a further established green boundary to protect views inward from the rural landscape. It is also noted that the proposed swale on the site location plan has not been included on this drawing. Because of this, we would recommend that an additional landscape plan is submitted before approval. This should give more landscape details, and differentiate between existing and proposed features.

Yours sincerely,

Roshni Patel, BSc (Hons), Pg Dip, MA
Junior Landscape Architect
Place Services at Essex County Council
roshni.patel@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.





09th May 2018

John Pateman-Gee
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear John,

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/18/00229

Location: Land Adjacent Roman Rise Rattlesden IP30 0QY

Proposal: Outline Planning Application(with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space.

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

Holding objection due to insufficient ecological information

Summary:

I have reviewed the revised Extended Phase 1 Survey (Hiller Ecology, April 2018) provided by the applicant, relating to the likely impacts of development on Protected & Priority species. The ecological assessment now covers the full red line boundary. However, it does not address the likelihood of farmland birds (e.g. Skylarks) being present and affected by the proposed development, as previously recommended in Place Services initial comments (26th January 2018). Therefore, there is currently insufficient ecological information for determination.

Consequently, it is recommended that an addendum to the ecological assessment or amended ecological assessment should be provided to determine the likely impacts of the development on farmland bird species.

I look forward to working with the LPA and the applicant to provide the missing information to overcome my holding objection.



Please contact me with any queries.

Regards,

Hamish Jackson GradCIEEM BSc (Hons)

Junior Ecological Consultant

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.



26 January 2018

John Pateman-Gee
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear John,

Application: DC/18/00229

Location: Land Adjacent Roman Rise Rattlesden IP30 0QY

Proposal: Outline Planning Application(with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space .

Thank you for contacting Place Services on the above application.

Holding objection due to lack of ecological information to determine the impacts of the development on protected and priority species/habitats.

This application currently has insufficient ecological information for determination. This is because the ecological report does not cover the full red line boundary of the proposed application. Therefore, a revised ecological report should be undertaken to include the planning application for change of use of land to public open space. This revised assessment may also provide an opportunity to consider farmland species, particularly birds. Please visit the [Priority Species Gateway](#) on the Suffolk Biodiversity Information Service website to determine what species should be considered for this application.

This further ecological information would then provide the LPA with certainty of likely impacts to biodiversity from the proposed development. It will also ensure that the decision made for this application is based on all relevant material considerations and in accordance with Government Circular 06/2005 (sections 98 and 99). Any additional mitigation measures and reasonable enhancements for protected species and priority species can then be secured as conditions of any consent.

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.

Regards,

Hamish Jackson BSc (Hons)



Junior Ecological Consultant
Place Services at Essex County Council
Hamish.Jackson@essex.gov.uk

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.

Consultation Response Pro forma

1	Application Number	DC/18/00229 Land Adjacent to Roman Rise, Rattlesden	
2	Date of Response	31/01/18	
3	Responding Officer	Name:	Thomas Pinner
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
4	Summary and Recommendation (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.	<p>1. The Heritage Team considers that the proposal would cause</p> <ul style="list-style-type: none"> • A low level of less than substantial harm to a designated heritage asset because the development would adversely impact upon the setting of numerous listed buildings. 	
5	Discussion 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 proposal consists of outline planning permission for the construction of 22 dwellings on agricultural land between the hamlet of Poystreet Green to the south and a C.20 housing estate to the north, along Rising Sun Hill.</p> <p>The heritage concern relates to the impact on the development on the setting of listed buildings within Poystreet Green including Cansell Grove Farmhouse (Grade II) and Limberlost (Grade II). There are also potential undesignated heritage assets in close proximity to the site. A second part of the application concerns the change of use of land to the east from agricultural to public use, which is not of heritage concern.</p> <p>The hamlet developed as a small cluster of dwellings focused around a road junction, located separately from the larger village of Rattlesden to the north. It is these earliest dwellings which are typically now listed. While there has been piecemeal development over time in the hamlet, the hamlet, and thereby the heritage assets within it, nonetheless retain their relatively isolated nature as an important part of their setting.</p> <p>The development would connect the hamlet to the C.20 development to the north; therefore the character of the heritage asset's setting would be further eroded.</p> <p>The supplied heritage statement is too short and therefore contrary to the requirements of the NPPF para.128.</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.

		In conclusion, the application does not meet the requirements of s.66 of the P(LBCA)A 1990 to preserve the setting of a listed building, nor the policies within the NPPF or the Local Plan. It is for these reasons that the heritage team does not support the proposal.
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	<i>Decision-takers should be mindful of the specific legal duties of the local planning authority with respect to the special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses, as set out in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</i>
7	Recommended conditions	

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.

BABERGH DISTRICT COUNCIL

MEMORANDUM

TO: John Patman-Gee - Planning Officer

From: Leigh-Anne Francis – Housing Enabling

Date: 21 March 2018

SUBJECT: DC/18/00229 - Affordable & Open Market Housing mix comments

Proposal: Outline Planning Application (with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space.

Land adjacent to Roman Rise, Rattlesden

Key Points

1. Background Information

A development proposal for up to 22 homes.
The policy position would be for 35% affordable housing on any site over 10 units, equating to 8 dwellings in total to be policy compliant.

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 **73** 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.

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 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. 781 applicants registered for affordable housing in Mid Suffolk at 1 March 2018.

2.7 Mid Suffolk's Council's Housing Register at 8 February 2018 shows:

- 11 applicants registered who have a connection to Rattlesden
- 7 applicants seeking 1-bedroom housing
- 4 applicants seeking 2-bedroom housing

Please note that this site is a S106 planning obligation site therefore the affordable housing provided will be to meet district wide need hence the **920** applicants registered is the important number, although the factors detailed at 2.7 above will also be taken into account, including the high demand for 3-bedroom homes detailed in the above table.

3. Preferred Mix for Open Market homes.

- 3.1 This proposal offers a good mix of dwelling types, sizes and tenures, with a mixture of 1, 2, 3, and 4-bedroom homes. The scheme recognises the need for smaller homes for sale on the open market and therefore meets identified housing need.
- 3.2 With an ageing population, both nationally and locally new developments should include properties suitable for older people and these together with all other homes on the site should, wherever possible, be built to Lifetime-Homes standards. In this instance 10 2-bedroom bungalows are being provided, which will be available for older people wishing to downsize. No comment has been made by the developer as to whether or not Lifetime Homes standards will be applied to these properties.
- 3.3 There is strong demand for one and two-bedroom flats/apartments and houses. Developers should consider flats/apartments that are well specified with good size rooms to encourage downsizing amongst older people, provided these are in the right location for easy access to facilities. The scheme proposed does provide a good mix of units sizes across the market housing element.
- 3.5 Broadband and satellite facilities as part of the design for all tenures should be standard to support.
- 3.6 All new properties need to have high levels of energy efficiency.

4. Preferred mix for Affordable Housing

- 4.1 Taking into account the needs information detailed above the proposed affordable housing mix is acceptable to the Council and is detailed below.

4.3 Affordable Tenure: Preferred AH mix – 8 out of 22 (35%)

Rented – 6 homes required: -

- 3 x 1- bed 2-person flats @ 50 sqm (currently shown as 48 sqm)
- 2 x 2-bed 4-person house @ 79 sqm (currently shown as 76 sqm)
- 1 x 3 bed 5-person house @ 93 sqm (currently shown as 86 sqm)

Shared Ownership – 2 homes required:-

- 1 x 2-bed 4-person houses @ 79 sqm (currently shown as 76 sqm)
- 1 x 3-bed 5-person houses @ 93 sqm (currently shown as 86 sqm)

5. Other requirements for affordable homes:

- Properties must be built to current Homes England National Housing Standards March 2015.

- The council is granted 100% nomination rights to all the affordable units on first lets and 75% on subsequent lets.
- Any Shared Ownership properties must have an initial share limit of 80%.
- 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
- 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
- On larger sites, the affordable housing should not be placed in groups of more than 15 units
- Adequate parking provision is made for the affordable housing units and cycle storage and bin stores.
- It is preferred that the affordable units are transferred to one of Babergh's partner Registered Providers – please see www.baberghmidsuffolk.gov.uk under Housing and Affordable Housing for full details.

Leigh-Anne Francis – Housing Enabling

Consultation Response Pro forma

1	Application Number	<p>DC/18/00229</p> <p>Outline application (with some matters reserved) Hybrid planning application comprising (i) Outline planning application for the erection of 22 dwellings (including 8 affordable homes) and (ii) planning application for change of use of land to public open space.</p> <p>Land adjacent to Roman Rise, Rattlesden</p>	
2	Date of Response	21/02/2017	
3	Responding Officer	Name:	Leigh-Anne Francis
		Job Title:	Temp Housing Enabling Officer
		Responding on behalf of...	Strategic Housing service
4	<p>Recommendation (please delete those N/A)</p> <p>Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.</p>	<p>No objection – supported as the development will meet the local housing needs as identified in The Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) document as updated in 2017 which confirms that there is a continuing need for housing across all tenures and a growing need for affordable housing.</p> <p>The 2017 SHMA indicates that in Mid Suffolk there is a need for 94 new affordable homes per annum.</p>	
5	<p>Discussion 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>	<p>This application proposes 22 units of which 8 will be affordable homes. This is Policy compliant with the requirement to provide 35% affordable on all sites of 10 units or more. The allocation of these units will be to applicants registered on the Council's housing register Homechoice.</p> <p>The housing waiting list currently shows that there are 11 applicants requiring accommodation in this area. The need is primarily 1 and 2 beds.</p> <p>For the open market units we would like to see an overall mix that reflects a range of housing needed in the district not only for those on our housing waiting list but for first time buyers including single people. Products should include shared ownership, shared equity, discounted sale etc. New developments should also include properties suitable for older people who may want to downsize.</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.

6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	<p>It would be proposed that at Reserved Matters the layout submitted should accommodate the that the affordable units are as follows: -</p> <p><u>Affordable Rented = 6</u> 3 x 1 bed 2-person houses @ 58 sqm 2 x 2 bed 4-person houses @ 79 sqm 1 x 3 bed 5-person houses @ 86 sqm</p> <p><u>Shared Ownership = 2</u> 1 x 1bed 2-person house @ 58 sqm 1 x 2 bed 4-person house @79 sqm</p>
7	<p>Recommended conditions</p>	<ul style="list-style-type: none"> • Affordable housing secured as per schedule of units as detailed in box 6. • The affordable homes should be built to comply with the Technical housing standards – nationally described space standards March 2015. • The Council is granted 100% nomination rights to all affordable units on initial lets and 75% thereafter. • The Shared Ownership properties must have an upper limit of an initial share purchase of 80%. • 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. • Adequate parking is made for the affordable housing units.

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