

Fressingfield Parish Council

Reconsideration of 1648/17

Post Mill Lane, Fressingfield following Highways/Traffic assessment Oct 20th 2017

It is to be welcomed that the Application is subject to an assessment and the Parish Council are grateful for the opportunity to comment upon it and associated matters.

The thrust of the report MA/P16 1151 referred to in the Transport Note suggests it takes account of the already agreed applications and those in the possible pipeline but when the one day of assessment was made offered little confidence in the narrow sampling extent. A wide range of other factors would seem relevant but are omitted from the considerations made.

Correspondence between ourselves (Appendix 1 Sept 2017) and SCC Highways who are yet to record their views on the Assessment, demonstrates the expectations we have of any assessment to be made. Our views identify the present pressure points and safety issues at specific locations, as well as the 'cumulative impacts of all six of the potential developments proposed & agreed' this fuller picture is deemed most appropriate. Particular concerns relate to Parking, safety, Pavements & Footways and roadway improvements.

We feel the Assessment fails to meet our expectations by:

1. Failing to include recent road events namely collisions since the data window. For example just at one location, Jubilee corner, we have experienced frequent fence demolition, crashes incl the taking out street light, and sideswipe of parked vehicles, also chemical spillages all in summer 2017. Other locations have endured incidents that have risked pedestrians safety notably on New Street.
2. Failing to properly explore the full cumulative impact of the six developments under consideration, selecting only to evidence the possible impact of Stradbroke Rd & JSR in the 'Enclosures' and data/modelling. The wider cumulative effect should be reviewed and not just the partial picture. As villagers we will not experience the 'partial' effect.
3. Limiting the perspective by using just PICARDY data to describe the picture and not take into account further proposed developments in other local villages for whom Fressingfield is a 'hub'. In Weybread housing proposals of 120+ could add to the challenges, especially associated with the School and the anticipated expansion of Stradbroke could well impact dramatically on the shared Surgery at Fressingfield. These 'cumulative' effects are totally omitted from the assessment.
4. Offering little or no vision of the cumulative impact on pedestrians. The experience of Fressingfielders using especially New Street as pedestrian is one of a sense of hazardousness. The increasing cumulative impact of increased traffic and closer parked vehicle, limited lighting arrangements would increase this hazardousness as they move to various service centres in the village. The proffering of 'pedestrians in road signs' para 1.23, would seem to suggest that the consultants do see this as a problem. Certainly, as pedestrians in this village with no continuous footways a cumulative effect would be vastly increased danger. Footway provision is not properly addressed in this report.
5. Failing to address parking provision to the service centres/areas of the village. There are already times when gridlock hits, especially when season movements of large agricultural

vehicles occur. There are numerous events when combines tracked vehicles, lorries have halted traffic around parked vehicles. Thus, cumulatively this can be expected to occur more frequently and expose the village to partial isolation to emergency service vehicles and wider access.

6. Failing to consider other aspects of traffic and transport that relate to Fressingfielders' capacity to travel safely in and beyond the village. Bus provision and access to public transport is now down to a single weekly bus so bus shelter access is of little value other than to school pupils (11-16). It might have been hoped that a 'traffic assessment' might be able to offer some insight as to sustaining the 'access vulnerable' groups in the village, namely the elderly and young people.

Whilst the above relates specifically to the cumulative effects of traffic increase, there are additional concerns that have emerged that relate to the roadways that this increased traffic would flow upon. Whilst wear and tear would increase placing costs on Highway maintenance budget, there are much more substantial costs that could be placed relating to environmental cumulative effects.

The above are relevant in so much as the Transport Note makes strong reference to Report assessments before making other points. The NPPF makes particular reference to road safety and sustainability when determining planning applications.

The Transport Note particular reference to both of these aspects of the proposal.

The Parish Council asserts that the cumulative effects of all developments, including that of Post Mill Lane, will each proportional increase risk for users of New Street, be they in vehicles or on foot. Table 1 attempts to mitigate the effect of uplift of traffic by referring footway provision as 'present or partial'. Unfortunately, there is no complete footway for pedestrians to use and any journey to 'service centres' incl school or surgery, would necessitate in crossing the road, sometimes frequently. However, some significant part of each journey would need to be on road without any pavement. An anticipated cumulative traffic flow and likely excessive parking would be expected to increase the already serious hazard.

The addition of a footpath from the proposed site onto New Street would be unfortunate as the path, albeit likely to have barriers, actually emerges at a point where there are no pavements and visibility is particularly poor. The provision of a safe footway remains desirable but impossible to provide and any cumulative development that is associated with /adjacent to New Street makes it less safe for all road users.

Where wider **sustainability** issues arise, the cumulative impact of development in the village of Fressingfield is of great concern. With 50+ dwellings already agreed, and the possible development impact from adjacent villages who use Fressingfield as a hub for health and school provision, the Parish Council feel the NPPF observations on 'residual cumulative impact of development' does not allow this development as sustainable.

Fressingfield Parish Council continues to object to this application.

Cumulative impact of Roadways on proposed 'open space'

Within this proposal for Stradbroke Road, the tarmacked road surfaces and domestic hard standings would create exceptional drainage issues for the site. The design of surface water management features to cope with flood risks are a significant part of the proposal, with a sizeable area designated as 'public open space' but intended to serve as a 'swail' or space to accommodate periodic flooding. The quality of this 'wetland' is dubious and will only be a safe public space at certain times.

The potential for overflow and inundation of adjacent amenities namely Play area, Club house, Tennis courts and Bowling green which are all in line to the nearest sizeable ditch. There is a small ditch on the edge of the development site but its capacity is unproven and indeed disappears into a restricted pipe below Sandpath, emerging in an unknown locality. The culminative effect of the roadways and associated surface water increase on these features is not disclosed and thus making the traffic assessment incomplete.

However, this feature has some attraction to it, namely public open space, but there are further concerns.

The provision of these 'drainage measures' probably at some considerable cost if they are to be done to acceptable standards, with appropriate safety measures should they result in ponding/wetlands, might be a considerable challenge to developers. They might indeed feel to be so much challenged, that to manage costs, the developer might be tempted to challenge their capacity to provide the expected 35% affordable housing within the proposal.

Should the developer feel confident in bring about these safe drainage measures, the act of offering them as open spaces to the community may not be as generous as it initially sounds. There will be significant costs to the 'community' as they become adopted from the developer. Anglia Water or the Parish Council might be considered as potential adoptees, yet both having no sustainable means of funding maintenance for this additional proposal. It would be reasonable if both possible adoptees refuse to do so, uncertain of any costs into perpetuity. The developer has made no provision for funding ongoing costs, and perhaps might consider the possibility of establishing a 'bond' to ensure such facility remains sustainable.

Unfortunately, should the circumstance arise that a 'bond', was not forthcoming because of its scale, the sustainability of the development might be put in doubt, perhaps with developers seeking to reduce the scale of affordable housing. Certainly, the seeking of retributive fees from existing residents or future ones through fees via 'management group service charge' mechanism would be unfair. Sustainability for residents is further questionable at this point.

It would be appropriate if the application was delayed until clear provision for a bond or such like is in place and avoid high levels of unsustainability.

Thus, as a Parish Council, as we reconsider the traffic aspects of this proposal, we feel that additional connected matters have warranted reconsideration. With these latter matters we feel it would be

wise to delay the proposals and take further assessment of the related potential cumulative effects on the sustainability of the proposal.

We continue to object to the application.

Garry Deeks

Chair, Fressingfield Parish Council.

Nov 10th 2017

APPENDIX 1

Fressingfield Highways/Transport Assessment

September 2017 – Fressingfield Parish Council

Points to be raised with Mark Stevens, SCC Highways as he considers the assessment of highway and traffic issues in Fressingfield as developers offer their assessment. Fressingfield Parish Council consider the elements below as salient to these considerations.

The present pressure points and road safety issues

New Street – narrowness and lack of pathways on the busiest road in the village where pedestrians experience traffic at its closest. Regular blockages when agricultural vehicles negotiate parked vehicles and other vehicles. Several vehicle damage incidents, yet no injuries recently.

Jubilee Corner – the right angle blind corner on the B1116, busy junction of five roads at the centre of the village. Large vehicles frequently making contact with others (monthly/weekly at times) fences removed, now no longer being replaced. Footway on one side only. pedestrian protection proposed, not enacted. Very dangerous crossing point for all ages.

Stradbroke Road/School – particularly overwhelmed at school times esp afternoon school leaving time. Parked cars and emerging traffic.

Doctors' Surgery – parking occurring away from the surgery constraining New St access and adjacent roads. Especially constricting at morning surgery times, clearest on Monday mornings when appointments are at their most intense.

Harleston Hill – the locality of recent fatalities and serious accidents, this part of the village, despite the presence of established electronic speed sensors remains a hazardous part of the village roadways. Traffic calming measures, advised by Suffolk CC, failed to materialise in any significant way and ongoing dangers are still present.

Speeding – this is identified as an increasing concern for residents, with traffic particularly along the B1116, Laxfield Road and Harleston Hill, the greatest concern. There would seem to be some merit in relocation speed limit sign along these and other roads into the village, additionally on Stradbroke Road. The straight road approaches to the village combined with the signed speed locations do not slow traffic sufficiently before it is actually in the village. Speeding in New Street is of concern albeit surveys do not identify an alarming average, yet within a busy pedestrian used road with no pathways and continuously parked cars, the perception is one of exceptional hazard and danger.

Impact of possible developments

Parking – the possible significant uplift in housing would place great pressure on roadside parking across the existing roads. Whilst driveway spaces will be provided, already levels of parked vehicles generate access problems for emergency and service vehicles. Increased on road parking will accompany any development, but at the levels proposed, gridlock situations might be expected to be common place along village streets. The hotspots for difficulties ie surgery, school shop etc could become alarmingly difficult.

Safety and vehicle damage – crash data and insurance information suggest Fressingfield does not perform well for a rural village. Extra development can be expected to exacerbate this situation exponentially. The safety and wellbeing of residents when using the existing roads and pathways would be significantly diminished by an unsustainable level of development.

New Street pressures – increased traffic, more numerous parked vehicles, extra roadway use as a pathway by pedestrians would all be magnified in New Street. With access to village facilities and greater traffic movements from increased local housing, this part of the village would quickly become an accident black spot, more than it already is.

Access points/junctions – The visibility and safe access/egress from junctions will be made more dangerous due to increased traffic flow. With several blind junctions around Jubilee Corner, local traffic will be at greater risk. Additionally the single junction access to any development on John Shepherd Road could be expected to serve approaching 150 properties, well beyond the recommendations in many local authorities.

Safety/speed limits/enforcement – Whilst the Parish Council is about to initiate upgrade traffic speed monitoring by introducing new speed monitoring devices, speed enforcement would become an increased issue should the proposed developments occur. With reducing resources available for enforcement, this will become an increasing concern for villagers even without the developments.

Public Transport/Buses/community transport

Fressingfield is blessed but on single bus service a week, to Harleston on a Saturday. With the removal of all other services over the past decade and the decline of the community buses, Fressingfield is very poorly served by way of public transport. Particular groups in the village, the elderly and the younger people are especially impacted by this. At present there are no active feasible proposals to mitigate this. Any increase in population would worsen this situation on the short to medium term.

Roadway improvements, JSR/PML

The state of roads and highways across the village is felt to be poor, narrow and strained. The potential for joining the proposed Post Mill Lane and John Shepherd Road sites by a roadway is felt to be a poor solution to any traffic compression. The traffic issues that surround New Street will simply be transferred to another road with neither of them being in any way adequate to solve an existing or future problem.

Pavements & Pathway improvements

Recent agreed developments (Red House Farm/Scout Hut) have ignored local concerns for the provision of safe pathways into the village facilities. It is felt that the development will actually increase risk to villagers and those using the scout facilities. The numerous proposals could plainly increase the level of danger across the existing pathways, which continue to be unsafe for present use. They are not sustainable for the present villagers and need improvement and increase, albeit uncertain as to how.

There are peak times when parking (school times/evenings & weekends), speeding (early mornings and early evenings) are already problematic. Any major increase in residents will dramatically enhance peak pressures.

In producing this proposal we have made use of evidence from data, photographic, survey, anecdotal & historic sources. Further information and consideration is available from Fressingfield Parish Council.

Garry Deeks

Chair, Fressingfield Parish Council

Sept 2017

Your Ref:
Our Ref:
Date: 2nd November 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: Vincent Pearce

Dear Vincent

TOWN AND COUNTRY PLANNING ACT 1990 -

PROPOSAL: Various Planning Applications in Fressingfield

LOCATION:

- **1648/17 Land off Post Mill Lane, 24 dwellings**
- **1449/17 Land off Stradbroke Road, 85 dwellings**
- **1432/17 Land off Shepherd Road, 99 dwellings**

Following the July 2018 revisions to the National Planning Policy Framework (NPPF) Suffolk County Council has reviewed its position regarding planning applications 1648/17, 1449/17 and 1432/17. The significant change in the NPPF is para 109 that states that development should only be prevented or refused on highway grounds if there would be an *unacceptable impact on highway safety*, or the residual cumulative impacts on the road network would be severe. This revises the previous guidance that stated that development should only be refused where the residual cumulative impacts are severe.

In our previous response we stated that the impact of the proposed development was at the high level of significance in terms of road safety, but that no single road safety issue was considered severe as no significant numbers of crashes had been recorded in the area and hence we could not recommend refusal of these applications based on the 2012 version of the NPPF.

Recent planning appeal decisions¹ have clarified the Planning Inspectorates views on road safety and we have considered these in our response. In summary the Planning Inspectors have viewed each site as unique and that the absence of a history of crashes should be balanced against observed road safety issues when deciding if there is an unacceptable impact on highway safety.

Due to concerns raised by residents during the planning process additional site visits were undertaken involving both driven and walked inspections. I personally visited the area on the morning of the 12th October 2018.

New Street

Pedestrians exiting from the footway north of Woodyard Cottage have poor visibility to either side and step straight onto the carriageway. Pedestrian barriers are present to restrain pedestrian but constrain the footway for those with pushchairs, wheelchairs or mobility scooters.

No footways are present on New Street resulting in pedestrians walking in the road. During the site visit a number of pedestrians, some elderly, were observed walking to the local shop. When vehicles approach there was a tendency for pedestrians to step into private driveways when possible. Where parked cars were present pedestrians often must walk into the road around them. When two cars meet one must stop if a pedestrian is in the road and no driveway is present.

Having examined the site, it is difficult to see how significant lengths of footway could be provided without reducing road widths and relocating on street parking. The presence of buildings abutting the road places further limitations as existing thresholds will need to be maintained.

Travel Modes

While not considered a scientific survey, it was noted that in the morning site visit only 3 children accompanied by two adults walked to school from north of Jubilee Corner, but a significant number of school children were in cars travelling through the junction. It is possible that concerns about safety discourage pedestrians particularly in the core of the village.

Conclusion

There are hazards to non-motorised users travelling on New Street or through Jubilee Corner. The layout of the village means that this is the desirable route to reach many services. The proposed developments will result in increased vehicle and pedestrian movements through this core area.

While it is appreciated that all three developers have contributed in finding ways to improve road safety the constraints imposed by the existing highway network severely restrict the practical options. The measures proposed are the best solution available within the existing constraints they fall short of making the highway safe for pedestrians.

While it is noted the few crashes have been recorded in this part of Fressingfield recent planning appeals have determined that weight should be given to observed conflicts between pedestrians and vehicles. It is the Highway Authority's opinion that this is the case on New Street and Jubilee Corner if further development were approved which increased pedestrian and / or vehicle movement through the core of the village without the provision of safe, practical alternatives.

It is the Highway Authorities opinion that further traffic passing along New Street and / or through Jubilee Corner would result in an unacceptable impact on highway safety particularly for vulnerable pedestrians.

For this reason, the Highways Authority recommends that permission is refused for these applications.

Yours sincerely,

Steve Merry
Transport Policy and Development Manager
Growth, Highways and Infrastructure

1: Planning Appeal References
APP/D3505/W/18/3197391 Land off Darking Road, Boxford
APP/W3520/W/18/3196561 Derry Brook Lane / Little London Hill, Debenham

From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 04 May 2017 16:15
To: Planning Admin
Subject: RE: Consultation on Planning Application 1648/17

Hello,

This development is in the high zone for CIL which is currently charged at £115 per square metre subject to indexing.

As this permission is outline, the CIL would not be calculated until the reserved matters are approved.

Kind regards,

Angharad Firth
Infrastructure Support Officer
Infrastructure Team
Babergh and Mid Suffolk District Council – Working Together

Mob: 07710854584
Tel: 01449 724978

From: Nathan Pittam
Sent: 04 May 2017 13:42
To: Planning Admin
Subject: 1648/17/OUT. EH - Air Quality Issues.

M3 : 193220

1648/17/OUT. EH - Air Quality Issues.

Land at, Post Mill Lane, Fressingfield, EYE, Suffolk.

Application for outline planning permission with all matters reserved for residential development and associated roads, infrastructure and open space.

Many thanks for your request for comments in relation to air quality at the above development. From an air quality perspective it would seem to me that with the low background levels in the area it is exceptionally unlikely that there will be an exceedance of an air quality objective owing to the additional traffic movements generated by the development and therefore I have no objections to the proposal from the perspective of Local Air Quality Management.

Regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

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Work: 01449 724715

Mobile:: 07769 566988

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

From: Nathan Pittam
Sent: 04 May 2017 13:36
To: Planning Admin
Subject: 1648/17/OUT. EH - Land Contamination

M3 : 193224

1648/17/OUT. EH - Land Contamination.

Land at, Post Mill Lane, Fressingfield, EYE, Suffolk.

Application for outline planning permission with all matters reserved for residential development and associated roads, infrastructure and open space.

Many thanks for your request for comments in relation to the above applicaiotn. I have reviewed the applcaiton and the supporting Phase I desk study that was undertaken by Plandescil (ref 21697/PH1DS/HSE) dated March 2017. The report covers all the historical uses of the site and concludes that the risks posed to end users of the site are low and that further work is unwarranted. I can confirm that I agree with the conclusions of the report and therefore have no objections 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.

Regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

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From:David Harrold

Sent:16 May 2017 13:07:51 +0100

To:Planning Admin

Cc:James Platt

Subject:Plan ref 1648/17/OUT Post Mill Lane, Fressingfield, Eye. EH - Other Issues

Thank you for consulting me on the above outline application for residential development.

I can confirm in respect of 'other' environmental health issues that I do not have any adverse comments or objection to the proposed development.

I would ,however, recommend a condition restricting the construction phase to standard hours due to the close proximity of other residential premises.

David Harrold MCIEH

Senior Environmental Health Officer

Babergh and Mid Suffolk Council

From: Iain Farquharson
Sent: 10 May 2017 13:06
To: Planning Admin
Subject: M3 193219. Consultation on Planning Application 1648/17

Dear Sir / Madam

We have reviewed the application and the documents submitted.

It is acknowledged that the application is for outline permission but this council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability.

There is no reference to policies CS3 & SO8 so we are unable to comment as to the suitability of the scheme from an environmental/sustainability perspective.

As these items have not been addressed the recommendation is refusal, should the planning department consider setting conditions to ensure the development meets its environmental obligations the following is suggested.

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 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). This document shall be submitted to, and approved in writing by, the Local Planning Authority.

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@baberghmidsuffolk.gov.uk

From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]

Sent: 03 May 2017 10:30

To: Environmental Health

Subject: Consultation on Planning Application 1648/17

Correspondence from MSDC Planning Services.

Location: Land at Postmill Lane, Fressingfield

Proposal: Application for outline planning permission with all matters reserved for residential development and associated roads, infrastructure and open space

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us within 21 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are HB1, Cor2, Cor5, Cor6, H7, H10, T9, T10, H13, H14, H15, H16, CSFR-FC1, CSFR-FC1.1, CL8, HB8, HB9, H17, GP1, Cor1, NPPF, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Resource Management
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Philip Isbell
Corporate Manager - Development Manager
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Mid Suffolk District Council
131 High Street
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Enquiries to: Rachael Abraham
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Web: <http://www.suffolk.gov.uk>

Our Ref: 2017_1648
Date: 5th May 2017

For the Attention of James Platt

Dear Mr Isbell

Planning Application 1648/17– Land at Postmill Lane, Fressingfield: Archaeology

This application lies in an area of archaeological interest recorded in the County Historic Environment Record, with medieval finds located within and adjacent to the proposed development area (FSF 081). The site is also situated to the rear of a street fronted by listed post medieval buildings. As a result, there is potential for the discovery of below-ground heritage assets of archaeological interest at this location and groundworks associated with this proposal will damage or destroy any archaeological deposits that exist.

There are no grounds to consider refusal of permission in order 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 on the basis of 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,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

From: David Pizzey
Sent: 08 May 2017 13:49
To: James Platt
Cc: Planning Admin
Subject: 1648/17 Land at Postmill Lane, Fressingfield.

James

There appears to be little conflict between this development, based upon the illustrative layout (option 4), and any significant trees/hedges on site. However, an arboricultural report will be required to fully assess the impact of this proposal and identify appropriate protection measures as required.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
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Babergh and Mid Suffolk District Councils - Working Together

From: Jason Skilton
Sent: 15 June 2017 09:24
To: X Delete Aug 17 - Planning Emails
Cc: Rebecca Biggs
Subject: 2017-06-15 JS Reply Land at Postmill Lane, Fressingfield Ref 1648/17

Dear Rebecca Biggs,

Subject: JS Reply Land at Postmill Lane, Fressingfield Ref 1648/17

Suffolk County Council, Flood and Water Management have reviewed application ref 1648/17.

We have reviewed the following submitted documents and we recommend removal of our holding objection (*dated 8/5/2017*) and **approval of this application subject to conditions:**

1. Flood Risk Assessment and Surface & Foul Water Drainage Strategy Ref 21647 dated March 2017 (*Note only reviewed sections relating to flood risk and surface water drainage*)
2. Contamination Report Desk Study Ref 21647 March 2017
3. Additional information received 8th June 2017 regarding land owners
4. Additional Information received 8th & 14th June 2017 regarding discharge point

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. 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;
 - c. 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;
 - d. 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;
 - e. 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;
2. 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.

3. Concurrent with the first reserved matters application 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.

4. 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.

5. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse 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

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864



Suffolk Fire and Rescue Service

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

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Your Ref: 1648/17
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:

Planning Ref: 1648/17

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: LAND AT POST MILL LANE, FRESSINGFIELD, SUFFOLK, IP21 5PJ
DESCRIPTION: 24 DWELLINGS
HYDRANTS 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.

OFFICIAL

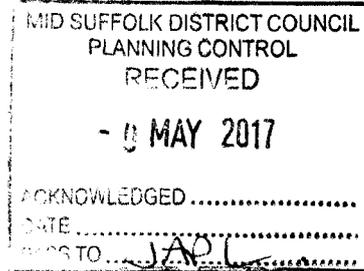
Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

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

Yours faithfully

Mrs A Kempen
Water Officer

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL



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

Your Ref: 1648/17
Our Ref: FS/F180893
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 08/05/2017

Dear Sirs

Land at Post Mill Lane, Fressingfield, Suffolk, IP21 5PJ
Planning Application No: 1648/17

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 firefighting, 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 firefighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

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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 firefighting 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

Copy: Mr Fergus Bootman, La Ronde Wright Ltd, 74 Bracondale, Norwich, NR1 2BE

Enc: Sprinkler information

Your ref: 1648/17
Our ref: 00049807
Date: 30 May 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Rebecca Biggs
Planning Officer
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear Rebecca,

Re: Fressingfield: Land at Post Mill Lane - Application for Outline Planning Permission with all matters reserved for residential development, up to 24 dwellings

I refer to the above application for planning permission in Mid Suffolk. There are five undetermined applications for planning permission on sites in Fressingfield. Two of these applications have committee resolution to approve subject to agreeing the planning obligation. These applications add up to over 254 dwellings. In addition SCC is aware of pre-app proposals in the locality. In view of this it is clear that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Proposed number of dwellings from development:	2 bedroom+ Houses	Total
	24	24
Approximate persons generated from proposal	55	55

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.

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 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.** 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 level	Minimum pupil yield:	Required:	Cost per place £ (2016/17):
Primary school age range, 5-11:	6	6	12,181
High school age range, 11-16:	5	0	18,355
Sixth school age range, 16+:	1	1	19,907

Total education contributions:	£92,993.00
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The local catchment schools are Fressingfield Church of England Voluntary Controlled Primary School and Stradbroke High School.

Primary School Places

The catchment primary School is Fressingfield. The amount of growth being considered through applications for planning permission gives SCC uncertainty about the scale and location of growth in Fressingfield and surrounding locality. In the absence of a site allocation document this presents some difficulty for the County Council in determining how the appropriate education strategy for Fressingfield can be best delivered.

The existing primary school is at capacity and it is clear that the landlocked nature of the site poses some challenges in terms of adding extra capacity to meet anticipated future needs arising from both latent population and housing growth. However early internal calculations conclude that it may be possible to expand the school within its site from 140 places to 210 places whilst also improving the school operational environment.

Expanding the existing school is considered to be the most sustainable and cost effective solution to cope with pupils arising from housing growth. However this is important to acknowledge that this is not the confirmed shared education strategy at this moment in time and this will need confirming with the school and planning permission secured. The head teacher has been

approached about the option of expansion, and no negative feedback was received.

Secondary School Places

The catchment secondary school is Stradbroke High School. This school does have sufficient spare places to absorb the additional secondary pupils. Sixth Form pupils will be accommodated at the Thomas Mills High School sixth form but this will need to be expanded. Therefore, this development is expected to necessitate a bid for the District Council's CIL funds.

Education Summary

We currently forecast to have no surplus places at the catchment primary school and Sixth Form High School. It is considered that it may be possible to expand the catchment primary school. However we would need to understand the level of growth overall that Mid Suffolk expects in the immediate locality to identify whether expansion is the best strategy.

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 communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act 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.

	Minimum number of eligible children:	Required:	Cost per place £ (2016/17):
Pre-School age range, 2-4:	2	0	6,091

In the Ward of Fressingfield there is 3 providers. Collectively they have surplus places available in this locality with sufficient spaces available to accommodate the children arising from the development.

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 will be co-ordinated by Martin Egan of Suffolk County Council, Transport Strategy.**

The cumulative impact of development will need to be considered including the high vehicle trip rates and the access to/from the A143.

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 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 established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent on improving development of library services serving the area of the development, and outreach activity from the nearest library, at Stradbroke.

Libraries contribution:	£5,184.00
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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:	£ 0.00
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- 7. 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.
- 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. Additionally, and more widely, when considering major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

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.

- 9. 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.

10. 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.

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

12. Time Limits. The above information is time-limited for 6 months only from the date of this letter and/or will need to be reassessed if a planning application is submitted.

13. Summary Table – Community Infrastructure Levy

Service Requirement	Contribution per dwelling	Capital Contribution
Education - Primary	£3,045.25	£73,086.00
Education – Secondary	£ 0.00	£ 0.00
Education – Sixth Form	£829.46	£19,907.00
Pre-School	£0.00	£ 0.00
Transport - see section 4 above		
Libraries	£216.00	£5,184.00
Waste	£0.00	£0.00
Total	£4,090.71	£98,177.00

Apart from any site specific matters to be secured by way of a planning obligation or planning conditions 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. This will be reviewed when a reserved matters application is submitted.

The cumulative development from other proposals will need to be taken into account and SCC expects to have further discussions with the District Council about what level of growth it considers appropriate for this settlement. The infrastructure mitigation set out above is affected by the overall number of dwellings being proposed in Fressingfield.

I would be grateful if the above information can be provided to the decision-taker in respect of this planning application and infrastructure mitigation reported fully in the committee report.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 10 May 2017 15:48
To: Planning Admin
Subject: 1648/17 Consultation response FAO James Platt

Dear Sir

Application ref: 1648/17
Our ref: 215003

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours faithfully

Jacqui Salt
Natural England
Consultation Service
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.



SUFFOLK CONSTABULARY

NOT PROTECTIVELY MARKED

Police Station, London Road Beccles

Telephone: 101 or 999 in an emergency Fax: 01473 613737 (24 hrs)

Calls may be monitored for quality control, security and training purposes.

Direct Dial:01986 835276

Date 10/05/17

Dear Sirs

REF: 1648/17

Thank you for the opportunity to comment on the above outline planning application.

I attach a copy of the document ***Designing Out Crime in Suffolk, Residential Developments***, which has been produced to help developers and designers determine the appropriate aspects of design that will help to reduce the opportunity for crime to occur within new developments. It has been proven that effective design will deter criminal and anti-social behaviour and will help create a sense of ownership and responsibility for new developments.

I would ask that you make this document available to the developer in order that they can consider these recommendations when work commences on the detailed design stage.

The indicative layout provided appears to include many of the recommendations we refer to but the guidance attached may help to provide a little more detail. In addition there is further and more detailed information contained in the Secured By Design (SBD) document "Homes 16".

I also strongly recommend that an application for Secured by Design (SBD) approval is made for this development.

I would be pleased to work with the client and the designer at the detailed design stage. An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime to occur and to reduce the fear of crime.

Officers and committee members are asked to consider the requirements of the following legislation relative to designing out crime when making a decision regarding this application.

Section 17 of the 'Crime and Disorder Act 1998'

This part of the Crime and Disorder Act places a duty on each local authority: *'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area*

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www.suffolk.police.uk

to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.

There is no exemption from the requirement of Section 17 within the planning process.

National Planning Policy Framework.

Paragraph 58 states:-

“Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”.

Paragraph 69.

This paragraph looks towards healthy and inclusive communities. The paragraph includes:-

“Planning policies and decisions, in turn, should aim to achieve places which promote:

Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion”

I would ask that you take these points into account when making your decision.

Alan Keely
Designing Out Crime Officer
Suffolk Police
Eastern Area



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00021608
Local Planning Authority:	Mid Suffolk District
Site:	Land at Post Mill Lane, Fressingfield
Proposal:	Application for outline planning permission with all matters reserved for up to 24 dwellings and associated roads, infrastructure and open space
Planning Application:	1648/17

Prepared by: Sandra Olim

Date: 19 May 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

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 Weybread Water Recycling Centre that will have available capacity for these flows.

Section 3 – Foul Sewerage Network

- 3.1 Development will lead to an unacceptable risk of flooding downstream. However a development impact assessment has been prepared in consultation with Anglian Water to determine a feasible mitigation solution.

We will request a condition requiring compliance with the agreed drainage strategy

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

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.

Foul Sewerage Network (Section 3)

CONDITION

No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

31 May 2017

Ms Rebecca Biggs
Planning Officer
Mid Suffolk District Council
High Street
Needham Market
IP6 8DL

Dear Ms Biggs

Planning application reference: 17/1432 Application for Outline Planning Permission with all matters reserved for residential development, up to 99 dwellings, including affordable housing, together with the construction of estate roads & footpaths, drainage, landscaping & the provision of public open space, including children's play space and

17/1648 Application for outline planning permission with all matters reserved for up to 24 dwellings and associated roads, infrastructure and open space

Land west of John Shepherd Road, Fressingfield

I am writing on behalf of the Suffolk Preservation Society ('the Society') to register our objection to the two outline planning applications which have been submitted on adjoining sites in Fressingfield for the erection of up to 99 and 24 dwellings plus associated development. The proposals relate to greenfield sites which are outside, but adjoining, the current physical limit of Fressingfield, a Primary Village. The Society objects to the proposals on the basis of their disproportionate scale, unsustainable location and the harm that may result to the setting of the conservation area.

Fressingfield is defined as one of 11 Primary Villages capable of limited growth where local need has been established. The Focused Review of the Core Strategy (2012) identifies that up to 300 dwellings will be provided in the plan period up to 2027 across all the Primary Villages. The latest published SHLAA (May 2016) which is only a draft document, identifies the sites FR04 (5ha) and FR06 (3.3ha) as capable of delivering 60 and 100 sites respectively. However, it identifies issues around the scale of the sites and therefore highlights the requirement for only partial development and, in both cases, identifies the potential impacts of developing this site on the setting of the conservation area.

Five Year Housing Land Supply in Mid Suffolk

The Annual Monitoring Report (June 2016) states that MSDC cannot demonstrate a five year housing land supply and therefore the local policies which seek to control housing supply within the district are considered to be out of date. Central to the NPPF is the presumption in favour of sustainable development (para. 49). Proposals should be supported (para 14) unless “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: or specific policies...indicate development should be restricted.” Footnote 9 specifically states designated heritage assets are protected in this regard.

Whilst we do not dispute the lack of a 5 year housing land supply in Mid Suffolk we wish to comment on the implications of this in light of the recent Supreme Court judgment (Suffolk Coastal DC v Hopkins Homes Ltd) 10 May 2017 which considered the proper interpretation of para. 49 of the NPPF and the legal status of the NPPF and its relationship with the statutory development plan.

It is understood that as Mid Suffolk cannot demonstrate a 5 year housing land supply *relevant policies for the supply of housing* should not be considered up-to-date and a presumption in favour of sustainable development applies (NPPF para. 49). However the NPPF is guidance only, and therefore whilst it is a material consideration within the determination of planning applications, it does not displace the statutory primacy of the development plan under Section 38(6) of the 2004 Planning Act. The Supreme court judgment emphasises this and concludes that the purpose of para. 49 of the NPPF is to trigger a ‘tilted balance’ towards sustainable development under para. 14 whilst the weight to be given to development plan policies remains a matter of planning judgment.

Sustainability

It is clear that the presumption in favour of sustainable development within the NPPF is a key consideration that will carry great weight. Nevertheless, Fressingfield is a rural settlement and remote from principal highway routes, being in excess of 4 miles from the A143, 5 miles from Harleston, the nearest commercial centre, 12 miles from Diss and 26 miles from Norwich. The village has limited services (pub, primary school and shop - currently closed) and has an even more limited public bus service (once a week to Norwich) and no employment. On this basis, the village cannot be deemed to provide a sustainable location for an increase in population from 450 households to over 575 households, approximately a 30% increase.

Setting of Fressingfield Conservation Area

The site falls immediately outside of the conservation area boundary. However, having visited the site it is clear that there are long views of the site from Harleston Hill which include the church and the historic village, which is a designated conservation area, nestled around it. The impact of the large housing development on the setting of the conservation area is a material consideration and indeed was identified in the draft SHLAA as a potential constraint to developing these sites. We are therefore disappointed that neither a landscape and visual impact appraisal (LVIA) nor a heritage assessment has been submitted in support of this major development. We would strongly recommend that such studies are called for to assess the impact on landscape and heritage of the proposed developments and inform the level of more appropriate development of these sites.

Para. 132 of the NPPF states *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation...Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting”*

The Core Strategy Focused Review policy FC1.1 sets out MSDC’s approach to delivering sustainable development including: *“Proposals for development must conserve and enhance the local character of different parts of the district”*. Policy CS5 of the Core Strategy aims to protect and enhance the natural and built historic environment and ‘saved’ policy HB8 of the Local Plan which states that care will be taken to conserve and enhance proposals which lie adjacent to a conservation area.

Conclusion

The Society fully understands and accepts the urgent need for allocating sites for housing in the district and acknowledges that this will inevitably include some greenfield sites. However it is important that the quantum of development proposed is considered against the existing and planned commitments in Fressingfield and is capable of being assimilated into the existing community. It is the opinion of the Society that a further 8 hectares of residential development creating some additional 125 dwellings, is disproportionate in the context of the existing approx. 450 homes. This level of growth represents approximately a 30% increase in households and is considered to be excessive unsustainable growth.

In this context we would strongly urge that the current applications are resisted in their current form and the scale of development is significantly reduced to ensure that the scale of development is compatible with the needs of the community and its ability to absorb change.

Yours sincerely,

Fiona Cairns
IHBC MRTPI
Director

Cc: Chairman, Fressingfield Parish Council
Phil Butler - SPS Mid Suffolk District
David Eve, Historic England
Fressingfield Ward Councillor, Lavinia Hadingham
Babergh/Mid Suffolk Heritage Team

Rebecca Biggs
Planning Department
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

30/05/2017

Dear Rebecca,

RE: 1648/17 Application for outline planning permission with all matters reserved for up to 24 dwellings and associated roads, infrastructure and open space. Land at Post Mill Lane, Fressingfield

Thank you for sending us details of this application. We have read the ecological survey report (Eco-Check, Apr 2017) and we note the findings of the consultant. We have the following comments:

Protected Species

Reptiles

The ecological survey report recommends that the site is surveyed for reptiles in order to allow assessment of the likely impacts of the proposal on this species group. Such surveys must be undertaken prior to the determination of this application to ensure that the decision is made having regard to all relevant material considerations in accordance with ODPM Circular 06/2005.

Reptiles are protected from killing and injury under the Wildlife and Countryside Act (1981) (as amended) and as such are a material consideration in any planning application.

Priority Habitats

Hedgerows

The ecological survey report identifies that hedgerows, a Priority Habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006), form the northern and eastern boundaries of the western part of the application site. Whilst the Proposed Site Layout Plan (Option 4) (drawing ref. 3325-TD-LW-XX-DRG-AR-1003) shows these hedgerows largely retained, it also shows them incorporated into the curtilages of the proposed dwellings. This would result in them losing the protection they currently receive under the Hedgerow Regulations (1997) and could result in adverse long term management which would significantly reduce their ecological value. We therefore query how these hedgerows would be protected from such impacts as part of the proposal?

It is also unclear whether a short section of hedgerow exists between the two fields which make up the application site. The vegetation in this area is to be removed as part of the development proposal, however it is unclear what measures are proposed to compensate for such a loss?

Cumulative Impacts

As recognised above, this application site is directly adjacent to another proposal for residential development to the east (Mid Suffolk DC planning application reference 1432/17). It is therefore recommended that the in-combination effects of both schemes are considered as part of the determination

of the applications.

Conclusion

As currently presented we consider that there is insufficient information available to conclude that the proposed development will not result in an adverse impact on protected species and Priority Habitats. We therefore wish to object to this application.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

James Meyer
Senior Conservation Planner

MID SUFFOLK DISTRICT COUNCIL

TO: Rebecca Biggs – Planning Officer

From: Julie Abbey-Taylor – Professional Lead – Housing Enabling

Date: 11.7.2017

SUBJECT: 1648/17/OUT

Location: Land at Postmill Lane, Fressingfield.

Proposal: Proposal – Outline Planning Application- all matters reserved for residential development and associated roads, infrastructure, and open space. Site size is 0.9 ha proposed layout for 24 dwellings.

Consultation Response on Affordable Housing Requirement

Key Points

1. Background Information

- Outline Planning Permission sought for 24 dwellings
- This site is to be considered under the Mid Suffolk Local Plan altered policy, H4
- Therefore the council will be seeking 35% of the total provision of housing which is for 8 dwellings.

2. Housing Need Information:

2.1 The Babergh and Mid Suffolk District 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 for the Mid Suffolk Area.**

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. 890 applicants registered for the Mid Suffolk area.

2.4 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.

	<p>The Shared Ownership properties must have a 80% staircasing bar, to ensure they are available to successive occupiers as affordable housing in perpetuity</p>
	<p>The Council will not support a bid for Homes & Communities Agency 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 affordable units delivered on the local needs part of the site will need further consideration regarding any grant application to the HCA and a support for grant cannot be guaranteed in this instance. It is recommended that RP partners consider this matter carefully.</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>Adequate parking provision is made for the affordable housing units</p>
	<p>It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.baberghmidsuffolk.gov.uk under Housing and affordable housing for full details.</p>



23 November 2017

Alex Scott
Babergh District Council
Council Offices
Corks Lane
Hadleigh
Ipswich

By email only

Dear Alex,

Application: 1648/17

Location: Land at Post Mill Lane, Fressingfield

Proposal: Application for outline planning permission with all matters reserved for up to 24 dwellings and associated roads, infrastructure and open space

Thank you for consulting Place Services on the above application.

No objection subject to conditions to secure ecological mitigation and enhancements

The submitted Preliminary Ecological Assessment report (Eco-Check Consultancy, April 2017), Reptile Survey (Eco-Check Consultancy, May 2017) and the Great Crested Newt Method Statement (Eco-Check Consultancy, November 2017) includes sufficient information to assess the impacts of development on protected and priority species.

Recommendations:

The mitigation and enhancement measures identified in the Preliminary Ecological Assessment report (Eco-Check Consultancy, April 2017), Reptile Survey (Eco-Check Consultancy, May 2017) and the Great Crested Newt Method Statement (Eco-Check Consultancy, November 2017) - should be secured and implemented in full. This is necessary to conserve and enhance protected and priority Species. The recommendations in the additional Method Statement for Great crested newts can be secured for this application within an amendment to an already recommended condition. Therefore, the ecological comments from Place Services (Sue Hooton, August 2017) are still advised to be followed.

I therefore recommend the following amended condition:

CONCURRENT WITH RESERVED MATTERS: COMPLIANCE WITH RECOMMENDATIONS IN THE SUBMITTED ECOLOGICAL REPORTS

"All ecological mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Assessment report (Eco-Check Consultancy, April 2017), Reptile Survey (Eco-Check Consultancy, May 2017) and Great Crested Newt Method Statement (Eco-Check Consultancy, November 2017) as already submitted with the planning



application and agreed in principle with the local planning authority prior to determination. An additional enhancement of hedgehog friendly fencing throughout the development is also required."

Reason: To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact me with any further 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.