

## **Committee Report**

**Item No: 5**

**Reference: DC/18/02924**

**Case Officer: Jack Wilkinson**

**Ward: Barking and Somersham**

**Ward Member: Cllr Anne Killett**

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## **RECOMMENDATION – REFUSE OUTLINE PLANNING PERMISSION**

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### **Description of Development**

Outline Planning Application (all matters reserved) - Erection of 6 affordable housing units and 8 open market housing units and a Parish Meeting Room/Community Building.

### **Location**

**Site:** Unit 1 Willisham Hall, Willisham Hall Road, Willisham, Ipswich Suffolk IP8 4SL

**Parish:** Willisham

**Site Area:** 0.6ha

**Conservation Area:** Not in Conservation Area

**Listed Building:** Not listed

**Expiry Date:** 29/03/2019

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**Application Type:** Full Plans Planning Permission

**Development Type:** Small Scale Major Dwellings

**Environmental Impact Assessment:** N/A

**Applicant:** Mr Paul Chaplin

**Agent:** Embrace Architecture Ltd

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

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The application is referred to committee for the following reason:

The application is the subject of a member call-in, which is attached as part of the papers to this committee report.

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

None.

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## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

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### **Summary of Policies**

FC01 - Presumption In Favour of Sustainable Development

FC01\_1 - Mid Suffolk Approach to Delivering Sustainable Development

FC02 - Provision and Distribution of Housing  
CS01 - Settlement Hierarchy  
CS02 - Development in the Countryside & Countryside Villages  
CS03 - Reduce Contributions to Climate Change  
CS04 - Adapting to Climate Change  
CS05 - Mid Suffolk's Environment  
CS06 - Services and Infrastructure  
GP01 - Design and layout of development  
HB14 - Ensuring archaeological remains are not destroyed  
H07 - Restricting housing development unrelated to needs of countryside  
H13 - Design and layout of housing development  
H14 - A range of house types to meet different accommodation needs  
H15 - Development to reflect local characteristics  
H16 - Protecting existing residential amenity  
H17 - Keeping residential development away from pollution  
T09 - Parking Standards  
T10 - Highway Considerations in Development  
RT04 - Amenity open space and play areas within residential development  
CL08 - Protecting wildlife habitats  
National Planning Policy Framework (NPPF2)

#### Supplementary Planning Documents

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

### **Consultations and Representations**

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

#### **Pre-Application Advice**

None.

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

##### **Anglian Water**

Objection - Development will lead to an unacceptable risk of flooding downstream. A drainage strategy will need to be prepared in consultation with AW to determine mitigation measures. AW request a condition requiring the drainage strategy covering the issue(s) to be agreed. From the details submitted to support the planning application the proposed method of surface water management does not relate to AW operated assets. As such, AW are unable to provide comments on the suitability of the surface water management. The LPA should seek the advice of the LLFA or the Internal Drainage Board. AW recommend a condition relating to foul water strategy. The foul drainage from this development is in the catchment of Needham Market Water Recycling Centre that will have available capacity for these flows.

##### **Local Lead Highways Authority**

Objection - The LLHA note that there are no changes to the proposal regarding highways from the previous application DC/17/04311. The plan of the access onto highway showing the visibility splays gives dimensions X=2.4m and Y=59m. However, as the proposed access is within a derestricted road, the Y dimension should be 215m as Design Manual for Roads and Bridges (this measurement is not achievable due to the neighbouring wall and vegetation). As the access cannot achieve the required standards, a 7 day/24hour automated speed survey is required to measure actual speeds to enable a

lower standard of visibility to be accepted. However, no such survey has been provided. LLHA Officers acknowledge the outline principle of the application, yet maintain concern due to insufficient parking spaces and turning/service areas, which may result in on-street and nuisance parking. Further concerns arise through the mixed use nature of the site, and possible conflicts between commercial traffic and pedestrians (primarily children), cyclists and residential traffic. Further details of the proposed footway link to the village and the development is required before we can make any recommendation - exact route, location, construction and surfacing material. However, this has also not been provided. The LLHA are not comfortable with the proposal, and are therefore unable to offer support based on the current submission.

### **Local Lead Flood Authority**

Holding Objection – Concerns are raised with the lack of on site drainage. LLFA has expressly stated; *“The reason why we are recommending a holding objection is because a significant surface water drainage asset is to be outside of the application red line”*. However, this may be overcome by a Grampian condition if members are minded to approve. This would require consultation with the LLHA engaged. At the time of writing the report, this matter remains unresolved.

### **SCC Archaeological Service**

No objection.

### **Place Services – Ecology**

No objection.

### **Environmental Health – Land Contamination**

No objection.

### **Environmental Health – Sustainability**

No objection.

### **BMSDC Heritage**

No objection.

### **Housing Enabling Officer**

Open market dwellings - This proposal provides a broad mix of housing however it is recommended that consideration be given to reducing the number of 4 beds to provide more 2 and 3 beds to reflect the need for smaller units.

Affordable dwellings - The following affordable housing mix has been proposed by the applicant and is broadly acceptable for this outline proposal:

- 2 x 1b x 2p flat
- 3 x 2b x 4p cottage
- 1 x 3b x 5p cottage

The use of cottage to describe some of the units would need to be clarified. Houses flats or bungalows are the preferred unit type.

It is noted that the design and access statement refers to the proposed scheme potentially being a rural exception model. The rural exception scheme process however is a separate area of planning policy with a distinct local connection allocation requirement with dwellings remaining in perpetuity. Open market units if allowed on a rural exception scheme are minimal in numbers to provide cross subsidy to ensure scheme viability.

## **BMSDC Air Quality**

No objection.

## **County Development Contributions Manager**

No objection.

## **Offton and Willisham Parish Council**

Support - The applicant has consulted with the parish council in the lead-up to this planning application, and the parish council supports the application in principle. There are several reasons for this decision. In 2008 we published a Parish Plan following extensive consultation with all parishioners in the 2 villages. Over 300 questionnaires were delivered to residents and 73% were completed and returned. This plan identified 15 projects for the parish council to consider and some we have been unable to meet. These include the following:

- A footpath connecting the residential housing in Willisham to the village church
- An open space play area, playing field and wild flower garden in Willisham
- A possible area for allotments
- The possibility for a village shop if sufficient support is proven

All of these could possibly be met as a spin-off from the planning application. Additionally, the current farm site and buildings are run down and an 'eye sore' in the community. In the same way that we supported the recent planning application to convert a derelict former poultry barn at Maltings House on Ipswich Road in Offton, which was approved and work is almost completed, so we support this application to convert these unused farm buildings on this Brown Field site.

## **B: Representations**

None received.

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

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

- 1.1 The site comprises of a collection of dilapidated and largely redundant farm buildings, grain store and vacant commercial units. The site is located approximately 250m from the main built-up area of the village of Willisham Tye, a countryside village. The site is located in the countryside for planning policy purposes.
- 1.2 Open countryside is located west and east of the site. To the south is Willisham Hall and Willisham Lodge.
- 1.3 The nearest listed building is the Grade II listed St Mary's Church south of the site. The site is not in a Conservation Area. The site is not within the boundary of a protected landscape and there are no statutory landscape designations that apply to the application site.
- 1.4 The application site measures approximately 0.6ha. The site is in Flood Zone 1.

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

- 2.1 The proposal seeks outline planning permission with all matters reserved for the provision of 14 no. dwellings (8 no. would be open market and 6 no. would be affordable housing units). The affordable units would be 4 no. affordable rented and 2 no. shared ownership. This would include garaging

and associated garden areas. Access will be achieved from Barking Road providing a cul-de-sac leading to the business unit allowed under extant permission 2173/12 and to the residential development. The business unit is not within the application site and is not part of this application.

- 2.2 The illustrated layout indicates a mix of two storey dwellings of terrace and detached design. The layout largely follows the layout of the approved business park. A community meeting room is also proposed adjacent to the new access point. The proposal discusses the potential for a new play area and wild meadow land available for public access however this does not constitute part of this application and is not included in the red line site plan which identifies the site.
- 2.3 The site benefits from an extant permission for bespoke B1 Business Park providing small-scale business units for existing and prospective tenants on the existing Willisham Hall Farm. The agent advised that preliminary works have been registered and confirmation of the works have been received by MSDC's Building Control Team. For the benefit of the doubt, it is accepted that this permission is extant albeit clear evidence that a commencement of works started has not been provided.
- 2.4 The proposal is largely the same as outline application DC/17/04311 that was refused by officers under delegated authority in November 2017, albeit that application sought approval of access and landscaping. The application was refused upon sustainability, lack of financial contribution to RAMS, flood risk, inadequacy of footpath link, and highways visibility.

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

- 3.1 The National Planning Policy Framework (NPPF2) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites to provide for 5 years housing provision against identified requirements (Paragraph 73). For sites to be considered deliverable they have to be available, suitable, achievable and viable. The District is currently unable to demonstrate a 5 year housing land supply. As such, the 'tilted balance' as set out under Paragraph 11(d) is engaged.
- 3.2 Policy CS1 of the Core Strategy identifies a settlement hierarchy as to sequentially direct development, forming part of a strategy to provide for a sustainable level of growth. The Policy identifies categories of settlement within the district, with Towns representing the most preferable location for development, followed by the Key Service Centres, Primary then Secondary Villages.
- 3.3 The proposal site is located outside of a defined Settlement Boundary, in the countryside, and is therefore in conflict with Policy CS1 of the Core Strategy. The proposal represents housing development in the countryside, and in applying the principle of policy, the proposal is inconsistent with the aims and objectives of CS1.
- 3.4 However, LPA Officers acknowledge Planning Appeal decision APP/W3520/W/18/3194926 for Woolpit, which does reduce the weight of CS1. CS1 is therefore 'weighted' accordingly, and the LPA must form conclusion with a presumption in favour of sustainable development engaged, as required by the 'tilted balance' of Paragraph 11(d).
- 3.5 Further to the consideration of CS1, Policy CS2 states that in the countryside development will be restricted to defined categories in accordance with other plan policies which include (inter alia) rural exception housing. This housing may comprise: agricultural workers dwellings; possible conversion of rural buildings; replacement dwellings; affordable housing on exception sites; sites for Gypsies and Travellers and travelling showpeople; the extension of dwellings; and the reuse and adaption of buildings for appropriate purposes. The proposal does not constitute any of the category of housing types listed in Policy CS2. The site is not a rural exception site. There is no policy support for the proposal to be found at Policy CS2.

- 3.6 Saved Policy H7 of the Local Plan states that in the interests of protecting the existing character and appearance of the countryside, outside settlement boundaries there will be strict control over proposals for new housing. The provision of new housing will normally form part of existing settlements. The proposal is contrary to Policy H7.
- 3.7 Paragraph 79 of the NPPF2 seeks to avoid isolated dwellings in the countryside unless certain circumstances apply: a rural worker need; the optimal viable use of a heritage asset; involves re-use of redundant buildings; involves subdivision of an existing dwelling; or is a design of exceptional quality. The proposal does not meet any of these criteria. The proposal finds no support at Paragraph 79 of the NPPF2.

### *Sustainable Development*

- 3.8 Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and, as with the NPPF2 requirements, the Council will work proactively with developers to resolve issues that improve the economic, social, and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must be demonstrated against the principles of sustainable development. Furthermore, as set out above the proposal shall be considered with regards to sustainability and the requirements of the titled balance of Paragraph 11(d):
- 3.9 The proposed development is not on a site abutting a settlement boundary. Instead it forms a parcel of brownfield land well separated from the body of the village by arable fields and is not connected by any footway. Willisham itself only comprises of dwellings; with no school, shop or employment opportunities other than the application site.
- 3.10 The new dwellings would be located within the countryside where future occupants of the dwelling would need to travel for all their daily needs, including convenience goods and services (work, doctors, school and food stores). Willisham is mainly surrounded by other countryside villages; Offton, Barking, Great Bricett and Wattisham and Battisford. Many of these villages have very limited facilities. Car dependency will be very high, and required not just for access to local services but further afield in order to obtain services for day to day living.
- 3.11 The Planning Inspectorate recently dismissed an appeal for a new dwelling in the built-up area of Willisham Tye (APP/W3520/W/16/3152185). The Inspector concluded that the site in Willisham Tye was isolated from facilities and services and offered limited opportunity to contribute to enhancing or maintaining the vitality of the surrounding rural communities. While this development provides greater benefit given its scale and affordable housing it is not considered that this would in this case outweigh the harm of being in this location and so far from facilities and services and harm as established under the appeal case.
- 3.12 The application proposes a footway that leads in the direction of the village adjacent Barking Road. No details of its location, construction, or length have been provided other than a general indication. As such it is unclear that such a highway improvement could be achieved on land outside of the application site. In any event, even if the footpath was to connect to the village, the footpath offers at best limited pedestrian connectivity benefit because there are limited amenities in the village upon which to make a connection, and it is clear from the Inspectors recent decision that Willisham Tye does not offer facilities.
- 3.13 The application proposes a new bus shelter on Barking Road. The bus service is identified as limited being every 3 hours to Ipswich in the morning only with the last bus to Ipswich at 1400 hours. The bus is also every 3 hours returning from Ipswich to Willisham and being only in the

afternoon only. Officers consider it very likely that the future occupiers of the proposed dwellings would be heavily reliant on the use of the private car despite the provision of this bus stop.

- 3.14 Whilst Officers recognise the social and economic benefits brought through with a new bus stop, footpath link, and community centre (discussed below), this 'on balance' does not outweigh the material harm caused by development in this unsustainable location. It is concluded that the application site is not a sustainable location for residential development. This conclusion is supported by the Draft Babergh and Mid Suffolk Joint SHELAA, August 2017, which discounts the site (SS0377) as being suitable for development for the following reason: '*Site is isolated from the settlement, services and facilities*'.

#### *Offton and Willisham Parish Plan*

- 3.15 The application refers to the proposal's consistency and furthering of the Offton and Willisham Parish Plan. The Parish Plan (undated) has not been subject to the Neighbourhood Plan process. The Parish Plan is not a Neighbourhood Plan. The Parish Plan does not form part of the relevant Development Plan. The Parish Plan carries no statutory weight.

#### *Community Centre*

- 3.16 The proposal includes provision of a community meeting room which could be used by local residents for community groups, events or meetings. However, the application fails to demonstrate the practicality and viability of providing such a unit. No details of 'end users' or the willingness of the local community to operate this type of facility have been provided. Whilst it may be something desired by residents the ability to financially operate and run this type of building or how it would be transferred to the end-user has not been provided or secured. Whilst the community centre provides social benefit, its inclusion does not override the sustainability harm identified, and is not a fundamental reason to approve. The issue of securing the land or building or both would also not be possible given the Council's CIL 123 list and so would be in conflict if sought to be secured by way of obligation.
- 3.17 Additionally, the community centre if acceptable as viable and essential for this development should be in a more sustainable location. The meeting room would be separate from the main residential properties of Willisham. Whilst a new footway is discussed in the Design and Access Statement, as noted above no details of its location, construction, or length have been provided. As such it is unclear that such a highway improvement could be achieved on land outside of the application site.

#### *Employment Opportunity*

- 3.18 The proposed development would result in the loss of the existing business units which provide some employment opportunity for the neighbouring rural settlements. The plans submitted with the application identify the provision of a B1 unit located to the front of the site abutting the road. This unit is not part of this application and comprises a unit approved under a scheme in 2012 for a business park. This application is not linked to the provision of this employment unit and there is no means to ensure this B1 unit is constructed as part of this development. In other words, development of the B1 unit is not guaranteed. Conversely, the loss of the existing business units is guaranteed if the application is approved. The proposal represents an employment disbenefit, not preferred or encouraged on a brownfield site and acts against any benefit of housing that the development may offer.

#### **4. Design and Layout**

- 4.1 Policy CS5 requires development to be of a high quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district.
- 4.2 Policy H13 of the Local Plan requires new housing development to be expected to achieve a high standard of design and layout and be of a scale and density appropriate to the site and its surroundings, whilst Policy H15 of the Local Plan similarly requires new housing to be consistent with the pattern and form of development in the area and its setting.
- 4.3 Policy GP1 of the Local Plan states that proposals comprising poor design and layout will be refused, requiring proposals to meet a number of design criteria including maintenance or enhancement of the surroundings and use of compatible materials.
- 4.4 The proposed development provides an indicative layout which largely follows the pattern of development approved under the 2012 application for a business park. The development would involve the development of all of the site but given the scale of the approved business park and the existing units on site the extent of development is not considered to be unduly harmful.
- 4.5 Consideration will need to be given to the appearance and scale of the buildings as to constitute good design and ensure the road and pavement widths are to the required standard and sufficient parking is achieved. The layout should ensure a good level of amenity for the new dwellings and adjacent dwellings. Consideration should be given to the amenity area associated with the meeting room. However, the application proposal is outline with such matters reserved and which can be appropriately controlled at reserved matters stage so as not to warrant reason for refusal in this regard.

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

- 5.1 Access is not a matter sought for approval. Careful attention would need to be paid to the layout of the development at the reserved matters stage to ensure not only that the proposed access is standard compliant, but also that parking levels are appropriate and adequate turning facilities for the commercial units and delivery and refuse access for Plots 6 - 14 are satisfactory.
- 5.2 The Highways Authority object, however this is not a matter sought as this stage and would require resolution at reserved matters stage. In the light of this and given the advice from SCC Highways in respect of speed surveys it is not considered that this warrants refusal.

#### **6. Archaeology**

- 6.1 This proposal lies in an area of high archaeological potential recorded in the County Historic Environment Record. The proposed development is located on the site of a medieval moated manor documented from the 12th century, and also on the site of the former Willisham Hall (HER ref WLS 003). As a result, there is high potential for encountering heritage assets of archaeological interest in this area and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist. There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets.

However, in accordance with Paragraph 141 of the NPPF2 any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed. Standard conditions are recommended.

## **7. Impact on Residential Amenity**

- 7.1 Policy H13 of the Local Plan seeks to ensure new housing development protects the amenity of neighbouring residents. Policy H16 of the Local Plan seeks to protect the existing amenity of residential areas.
- 7.2 The proposed development is not considered to give rise to any adverse impact to residential amenity due to the position and distance of the site to adjacent residential properties. The final layout and appearance of the buildings will ensure the interfaces are acceptable.
- 7.3 The interface between the proposed dwellings and approved but not yet constructed B1 unit can be designed in a sufficiently sensitive manner at the reserved matters stage, to ensure that the internal amenity of the future occupants of the dwellings is achieved to a satisfactory level. If the B1 unit was not to develop, the existing agricultural building and agricultural use may remain. Again this is not considered an unacceptable arrangement subject to detailed interface design at the reserved matters stage.
- 7.4 There is nothing forming part of the application that suggests the development cannot accord with local policies H13 and H16.

## **8. Landscape Impact and Trees**

- 8.1 Policy CS5 of the Core Strategy seeks to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encouraging development that is consistent with conserving its overall character.
- 8.2 The site is not in an area of special character designation such as an Area of Outstanding Natural Beauty or Special Landscape Area. Nor is the site adjoining, or in proximity to, any designated landscape areas of special significance.
- 8.3 The proposed development would utilise a brownfield site which is recognised by local residents as currently detracting from the visual qualities of the area. The re-development for housing, whilst uncharacteristic in its form and layout to residential development in this locality, is not considered to harm the landscape much beyond the impact of the approved business units pursuant to planning permission 2173/12.
- 8.4 The proposed landscaping retains the mature boundary trees to the north-west boundary and incorporates new boundary hedging and structural trees around the boundary edge. Structural planting will be provided within the site to soften the rear boundaries of some plots and to break up the parking areas and hard surfacing. The proposed landscaping is acceptable in its current proposal but is likely to require further agreement with the submission of the reserved matters.

## **9. Ecology**

- 9.1 Policy CS5 of the Core Strategy requires development to protect, manage and enhance Mid Suffolk's biodiversity.
- 9.2 Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) requires all 'competent authorities' (public bodies) to 'have regard to the Habitats Directive in the exercise of its functions.' For a Local Planning Authority to comply with regulation 9(5) it must 'engage' with the provisions of the Habitats Directive.
- 9.3 The application is supported by an Ecological Survey Report (MHE Consulting Ltd, August 2017), relating to the likely impacts of development on Protected & Priority species. The LPA is satisfied that there is sufficient ecological information available for determination. This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable in ecology terms. The Ecology Consultee supports the reasonable biodiversity enhancements, which should be secured by a condition if Members are minded to approve. This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006. This is necessary to conserve Protected and Priority species.

## **10. Flooding and Drainage**

- 10.1 The site is located in Flood Zone 1 and the application is supported by a Flood Risk Assessment. Anglian Water object to the scheme owing to the potential for flooding downstream. The LLFA maintain a holding objection on the basis of unresolved off-site flooding.

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## **PART FOUR – CONCLUSION**

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### **11. Planning Balance and Conclusion**

- 11.1 Whilst the District is unable to demonstrate a 5 year housing land supply (as set out under Planning Appeal reference: APP/W3520/W/18/3194926), the application (with reduced weight applied to core Policies CS1 and CS2 which relate to housing supply) remains inadequately connected to services, facilities or amenities and without benefits in economic, social or environmental terms to outweigh this.
- 11.2 The proposal does not comply with the requirements of local and national policy:
- The site is in open countryside where there exists at a local policy level a clear presumption against residential development.
  - The subject land does not comprise a rural exception site nor can be justified as one of the housing exceptions listed at Policy CS2.
  - The proposal does not meet any of the criteria at Paragraph 79 of the NPPF2.
  - The site is isolated in a physical sense, set some considerable distance from local services.
  - The site is isolated in a visual sense, set in the open countryside and detached from the body of the nearest village.
  - The development will not form part of an existing settlement.
  - The proposal is merely policy compliant with respect to affordable housing, there is no compelling affordable housing benefit resulting from the development.

- The proposal is not supported by a Neighbourhood Plan.
- The proposal will result in the loss of existing and proposed employment land.
- It is unclear whether the provision of the community centre is feasible and practical in terms of future ownership and long term management.
- It is not adequately demonstrated that the proposed footway would be possible and whether it would provide a suitable means of pedestrian connectivity to a village, which in any event, contains no local amenities of note.

11.3 In conclusion, the proposal does not constitute sustainable development and is contrary to national and local planning policies, all of which seek to resist open market dwellings in isolated locations in the open countryside.

## **RECOMMENDATION**

That the Acting Chief Planning Officer be authorised to refuse outline planning permission for the following reasons:

1. The proposal is not considered to form sustainable development by reasons of its relationship to the existing built settlement, offering an uncharacteristic intrusion into the countryside, with poor connectivity to services, facilities and amenities which is not conducive for day to day living and working. Furthermore, the proposal lacks demonstrable social, economic and environmental benefits, and undermines the essence of the NPPF further through no justifiable need or mitigating measures. No exceptional circumstances or other material considerations have been demonstrated to outweigh the harm identified. The proposed development is isolated and none of the exceptional circumstances listed at Paragraph 79 apply. The proposal is therefore considered to be contrary to the NPPF, Policy CS2 of the Mid Suffolk Core Strategy (2008), Policies GP1 and H7 of the Mid Suffolk Local Plan (1998) and policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012).
2. The development would result in the unjustified loss of existing employment land. The provision of the B1 unit does not form part of the application and there is no connection between the development of the proposed dwellings and the provision of the employment use. The proposal is therefore considered to be contrary to the NPPF, Policy E6 of the Mid Suffolk Local Plan (1998) and policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012).
3. The application as submitted fails to demonstrate that the proposed development would not increase the risk of flooding off-site through adequate mitigation measures compliant with national or local standards. As such the proposal conflicts with the aims of Paragraph 107 of the NPPF and Paragraph 107 of the associated Planning Practice Guidance, Policy CS4 of the Mid Suffolk Core Strategy (2008) and Policies FC1 and FC1.1 of the Core Strategy Focused Review (2012).
4. The proposal would make inadequate provision/contributions for community and other facilities/services for the occupants of the dwellings. The applicants have not entered in to the necessary legal agreement, which is required to ensure the following are provided:
  - The provision of 35% of the dwellings as on-site Affordable Housing
  - Contribution to RAMS mitigation
  - The adoption of the access to the site and estate road within the site
  - Management Plan to deal with the provision and maintenance of open space / amenity area

The Proposal is therefore contrary to the NPPF, saved Policy CS6 of the Mid Suffolk Core Strategy (2008), Policy FC1.1 of the Core Strategy Focused Review (2012) and saved Altered Policy H4 of the adopted Mid Suffolk Local Plan First Alteration.