

Committee Report

Item 7B

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

Ward: Battisford and Ringshall

Ward Member: Cllr Daniel Pratt

RECOMMENDATION – Refusal

Description of Development

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

Location

Land On The South Side Of Bildeston Road, Offton

Parish: Offton

Expiry Date: 28.02.2019

Application Type: Outline

Development Type: Residential

Applicant: Mr & Mrs Stephen Phillips

Agent: Country House Developments Ltd

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reasons:

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

Details of Previous Committee/Resolutions and Member Site Visit

None.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

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

CS01 - Settlement Hierarchy

CS02 - Development in the Countryside & Countryside Villages

CS03 - Reduce Contributions to Climate Change

CS04 - Adapting to Climate Change
CS05 - Mid Suffolk's Environment
CS06 - Services and Infrastructure
FC02 - Provision And Distribution Of Housing
FC01 - Presumption In Favour Of Sustainable Development
FC01_1 - Mid Suffolk Approach To Delivering Sustainable Development
CS12 - Retail Provision
GP01 - Design and layout of development
HB08 - Safeguarding the character of conservation areas
H4 – A proportion of affordable housing in new housing developments
H13 - Design and layout of housing development
H16 - Protecting existing residential amenity
E12 - General principles for location, design and layout
T09 - Parking Standards
T10 - Highway Considerations in Development

National Planning Policy Framework (NPPF)

Supplementary Planning Documents
Suffolk Adopted Parking Standards (2015)

Consultations and Representations

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

A: SUMMARY OF CONSULTATIONS

Parish Council

Offton and Willisham Parish Council:

Summarised as follows:

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

Somersham Parish Council:

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

Historic England

No comments

SCC Infrastructure

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

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

Environment Agency

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

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

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

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

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

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

Foul drainage objection was maintained at this point.

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

Therefore, ultimately no objection.

Waste Services

No objection, subject to conditions.

Rights of Way

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

Landscapes

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

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

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

Heritage

No comments

Sustainability

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

Suffolk Wildlife Trust

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

Strategic Housing

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

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

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

Therefore object.

County Archaeological Service

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

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

Two standard conditions were then proposed.

County Fire and Rescue Service

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

Planning Policy

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

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

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

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

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

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

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

Economic Development

No comments.

Tree Officer

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

Place Services - Ecology

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

Natural England

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

BMSDC Air Quality

No comments.

BMSDC Land Contamination

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

Travel Plan Officer

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

Suffolk Police

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

SCC Flood and Water

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

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

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

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

SCC Highway Authority

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

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

B: REPRESENTATIONS

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

- Overdevelopment;
- Not needed;

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

PART THREE – ASSESSMENT OF APPLICATION

1.0 The Site and Surroundings

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

2.0 The Proposal

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

3.0 The Principle of Development

- 3.1 At the heart of this application is the consideration as to, notwithstanding any other matters, whether there is an overarching acceptance or opposition to development on this site. Whilst all material considerations must be weighed, the fundamental spatial element must first be considered.
- 3.2 Core Strategy Policy CS1 states that development should be directed towards the larger towns and villages in the Settlement Hierarchy, designating all other sites as “countryside” adding “the countryside that surrounds Mid Suffolk settlements.....will be protected for its own sake.” Whilst Policy CS2 makes clear: “In the countryside, development will be restricted to defined categories in accordance with other Core Strategy policies.” The site does not fall under the defined categories, so given that it is not within any Built-up Area Boundary (BUAB), it is thus defined as “countryside”, there is a clear policy presumption against development here.
- 3.3 However, CS1 and CS2 were criticised by the Inspector at the Woolpit appeal (APP/W3520/W/18/3194926) for being non-NPPF-compliant; he thus afforded them very limited weight.
- 3.4 The NPPF (2018, revised 2019) states, at paragraph 11, “Plans and decisions should apply a presumption in favour of sustainable development.”
- 3.5 This is further clarified:
- For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶ ; or;*
 - ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 3.6 This invites us to consider the NPPF as a whole and, in particular, Chapter 2 “Achieving Sustainable Development” where paragraph 7 plainly states: “The purpose of the planning system is to contribute to the achievement of sustainable development.”
- 3.7 Sustainable development is then broken down in to three key “overarching objectives”: economic, social, environmental, which should all be considered together.
- 3.8 Is the development, therefore, sustainable?
- 3.9 Offton is described in Core Strategy Policy CS1 as a “Countryside Village” where development should be avoided, lacking the necessary services and giving rise to car-dependency. But this requires further analysis.
- 3.10 In terms of day-to-day living; Offton is a small village (358 inhabitants in the 2011 Census) and has no schools or shops, but does have a village hall nearby and a public house 1.5km away. These limited facilities are augmented by a weekly fish and chips van and a bi-weekly mobile library.
- 3.11 There is a limited bus service (thrice daily) between Ipswich and Hitcham.
- 3.12 In a purely environmental sense, the site cannot be held to be sustainable as much of the day-to-day living would be dependent on car use to access other settlements such as Needham,

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

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

4.0 Site Access, Parking and Highway Safety Considerations

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

5.0 Design and Layout

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

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

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

7.0 Land Contamination

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

8.0 Heritage Issues

- 8.1 Policy HB1 of the Local Plan seeks to protect the character and appearance of buildings of architectural or historic interest, particularly protecting the settings of Listed Buildings. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Listed Building or its setting.
- 8.2 Paragraph 192 of the NPPF states "In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic

vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.”

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

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

9.0 Impact on Residential Amenity

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

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

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

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

10.0 Flooding and Drainage

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

11.0 Affordable Housing

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

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

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

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

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

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

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

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

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

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

PART FOUR – CONCLUSION

12.0 Planning Balance and Conclusion

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

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

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

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

13.0 RECOMMENDATION

13.1 Refusal for the following reasons:

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

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

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

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

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

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

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

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