

**From:** Clerk FressingfieldPC <clerk.fresspc@gmail.com>

**Sent:** 20 May 2020 12:34

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Subject:** Re: DC/19/05741 Land off Stradbroke Road Street Farm Fressingfield

Hello Jane.

The addendum to update the ecological assessment, provided by NWA Planning in April, does not affect the council's views about this application. Therefore there will not be a new comment.

**Andy Parris** clerk to Fressingfield Parish Council  
01379 586745 | 07873 970834 | [clerk.fresspc@gmail.com](mailto:clerk.fresspc@gmail.com)

**Website:** <https://fressingfieldpc.org/>

# Consultee Comments for Planning Application DC/19/05741

## Application Summary

Application Number: DC/19/05741

Address: Land Off Stradbroke Road Street Farm Fressingfield IP21 5PR

Proposal: Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.

Case Officer: Vincent Pearce

## Consultee Details

Name: Mr Andy Parris

Address: The Stooks, New Street, Fressingfield Eye, Suffolk IP21 5PG

Email: clerk.fresspc@gmail.com

On Behalf Of: Fressingfield Parish Clerk

## Comments

Fressingfield Parish Council recommends refusal of this application.

When the district council considered the previous application (1449/17), councillors were appalled to hear of how raw sewage would periodically overflow from Fressingfields sewerage system into the street and a local watercourse. This problem has still not been solved and is getting worse. Steady or heavy rain seems to be the catalyst. (Details are in the SAFE response.) A working group and closer connections with Anglian Water, Suffolk Highways and Suffolk Flood Management have been established.

However, the full causes of the problem, which is a health hazard and a 21st century disgrace, have not yet been identified. Only when that is done can solutions be designed and implemented. Any proposals that try to avoid exacerbating the problem are currently based on incomplete knowledge of the causes. Fressingfield Parish Council believes that only when these problems have been solved should new housing applications be seriously considered.

Put simply, it is not right to expect residents to live in an expanding village where the contents of their loo end up in the street and the local watercourse.

Key points from the councils planning committee meeting:

Planning permission already exists for 51 houses in the village.

If permission is granted for this new development, it would mean that planning permission had been given to 28% more than the minimum required in BMSDC draft Local Plan.

There are 2 other development applications currently on the table. These would add a further 45

homes to the village. The resulting figure of 117 homes (51+21+45) is more than double that in the draft Local Plan. The plan has another 16 years to run.

As permission has been granted for 51 houses already, the medium-term sustainability of the school is not an issue.

Benefits would accrue to the parish via a CIL allocation.

There are real benefits in having the genuine asset of the shop being able to expand and thus provide a greater service.

A new shop would remove the dangers of parking pressures on New Street.

The mixed housing of this proposal (houses, self-build, flats) is good. It would offer opportunities to young people to get into the housing market.

Too many of the driveways for these houses feed directly onto Stradbroke Road.

Adding a further 21 houses (42 cars?) will add to the road safety fears of many residents.

These additional vehicles will inevitably impact on the safety and emotional well-being of all pedestrians. There are important pedestrian routes in the middle village where there are no pathways and the streets are narrow (around Jubilee Corner, substantial parts of New Street and part of Stradbroke Road).

In its report to the district council at the last application (1449/17), Suffolk Highways confirmed that accidents did not need to have occurred to identify a route as dangerous, but ... that weight should be given to observed conflicts between pedestrians and vehicles... (NPPF para 110)

Although measures were proposed to mitigate the dangers likely to occur with an increase in vehicular and pedestrian traffic on routes at the core of the village, the report stated, The measures proposed are the best solution available within the existing constraints (but) they fall short of making the highway safe for pedestrians.

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

There are no public transport links to and from the village.

Placing the shop close to the entrance to School Lane would create a danger of increased traffic particularly at the start of the school day.

Speed restriction plans for New Street would be welcome.

**From:** SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>  
**Sent:** 17 December 2019 09:53  
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Subject:** DC/19/05741 Consultation Response

Dear Sir/Madam

Application ref: DC/19/05741  
Our ref: 303541

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

Dominic Rogers  
Consultations Team  
Natural England  
Hornbeam House, Electra Way  
Crewe, Cheshire, CW1 6GJ

Enquiries line: 0300 060 3900  
Email: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)  
[www.gov.uk/natural-england](http://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.

**Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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

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

[<mailto:planningyellow@baberghmidsuffolk.gov.uk>]

Sent: 12 December 2019 10:10

To: SM-NE-Consultations (NE) <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>

Subject: MSDC Planning Consultation Request - DC/19/05741

Please find attached planning consultation request letter relating to planning application - DC/19/05741 - Land Off Stradbroke Road , Street Farm, Fressingfield, IP21 5PR

Kind Regards

Planning Support Team

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Your Ref:DC/19/05741  
Our Ref: SCC/CON/5214/19  
Date: 10 January 2020



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

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

The Planning Department  
MidSuffolk District Council  
Planning Section  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

For the attention of: Vincent Pearce

Dear Vincent

**TOWN AND COUNTRY PLANNING ACT 1990  
CONSULTATION RETURN: DC/19/05741**

**PROPOSAL:** Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.

**LOCATION:** Land Off Stradbroke Road, Street Farm, Fressingfield, IP21 5PR

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

The Indicative Site Plan for this site shows all the dwellings fronting Stradbroke Road having direct vehicular access onto the highway. Although it is shown there is sufficient turning facilities at each dwelling to enable vehicles to enter and exit the highway in forward gear, Stradbroke Road is a classified road (C515) and dwelling accesses should not, as far as possible, join a priority road; high number of accesses over a distance of 150m.

This proposal at present is not acceptable in terms of highway safety and we recommend that the access design be altered to reduce the number of accesses. We look forward to receiving further information.

Yours sincerely,

**Samantha Harvey**  
**Senior Development Management Engineer**  
Growth, Highways and Infrastructure

## **BMSDC Planning Area Team Yellow**

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**From:** RM Floods Planning  
**Sent:** 16 December 2019 09:06  
**To:** BMSDC Planning Area Team Yellow  
**Cc:** Vincent Pearce  
**Subject:** 2019-12-16 JS reply ,Land Off Stradbroke Road Street Farm Fressingfield IP21 5PR Ref DC/19/05741

**Categories:** Katherine

Dear Vincent Pearce,

**Subject: Land Off Stradbroke Road Street Farm Fressingfield IP21 5PR Ref DC/19/05741**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/05741.

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

- Location Plan Ref 3383-15
- Flood Risk Assessment & Drainage Strategy Ref JJ/CC/P16-1151/07 Rev D
- Indicative Foul and Surface Water Drainage Strategy ref 1151/02/002 rev C

The reason why we are recommending a holding objection is because the submitted assessment of the flood risk is out of date and is no longer valid. We also note that the proposed surface water drainage system proposed utilises a hybrid Suds system, this is contrary to national and local policy/guidance for multifunctional SuDs. The proposed storage area for surface water drainage system is proposed to be located outside of the redline boundary.

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

1. Submit a updated assessment of the predicted and known flood risk for all flood risk
  - a. Fressingfield has a history of surface water flooding along Cratfield Rd whereby the existing foul water drainage system is overwhelmed.
2. Submit a surface water drainage system utilising an above ground full SuDs system
3. Submit a revised plan showing all of the surface water drainage system wholly within the redline boundary of the application
4. Demonstrate that there is sufficient space (area and volume) for the for the attenuation basin
  - a. Basin side slopes shall be no greater than 1:4, with a max depth of water of 1.2m, 1.5m width wet/dry basins and a 300mm freeboard

Kind Regards

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

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

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

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

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

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

Date: 16/12/2019

Dear Sirs

**Land off Stradbroke Road, Street Farm, Fressingfield IP21 5PR**  
**Planning Application No: DC/19/05741/OUT**  
**Hydrants are required for this development**  
**(see our required conditions)**

I refer to the above application.

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

### **Access and Fire Fighting Facilities**

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

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

### **Water Supplies**

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

**Sprinklers Advised**

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

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

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

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: [neil.ward@nwaplanning.co.uk](mailto:neil.ward@nwaplanning.co.uk)

Enc: Sprinkler information

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

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

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

Date: 16 December 2019

**Planning Ref: DC/19/05741/OUT**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land off Stradbroke road, Street Farm, Fressingfield IP21 5PR**  
**DESCRIPTION: Shop and 21 Dwellings**  
**HYDRANTS REQUIRED**

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

**If the Fire Authority is not consulted at the planning stage, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.**

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

OFFICIAL

Created: September 2015

Enquiries to: Fire Business Support Team

Tel: 01473 260588

Email: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)



Dear Sir/Madam

## **Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development**

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

### **Dispelling the Myths of Automatic Fire Sprinklers**

- Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.
- Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.
- An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.
- Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

### **Promoting the Benefits of Automatic Fire Sprinklers**

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.

- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.
- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

### **The Next Step**

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully

Mark Hardingham

Chief Fire Officer

Suffolk Fire and Rescue Service

Your ref: DC/19/05741/OUT  
 Our ref: Fressingfield, Land Off  
 Stradbroke Road, Street Farm IP21  
 5PR. Matter No: 60004  
 Date: 18 November 2020  
 Enquiries to: Ruby Shepperson  
 Tel: 01473 265063  
 Email: [Ruby.shepperson@suffolk.gov.uk](mailto:Ruby.shepperson@suffolk.gov.uk)



**By e-mail only:**

[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)  
[Vincent.pearce@baberghmidsuffolk.gov.uk](mailto:Vincent.pearce@baberghmidsuffolk.gov.uk)

Dear Vincent,

**Fressingfield: Land Off Stradbroke Road, Street Farm, IP21 5PR – developer contributions.**

I refer to the proposal: Outline Planning Application (all matters reserved) – Erection of shop (Class A1 and residential development (up to 21 dwellings including affordable housing and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.

This letter provides an update in respect of infrastructure requirements set out in my letter dated 23 December 2019 which was time-limited to six months.

Updated summary of infrastructure requirements:

CIL	Education	Capital Contribution
	- Primary @ £17,268 per place	£86,340
	- Secondary @ £23,775 per place	£95,100
	- Sixth form @ £23,775 per place	£23,775
CIL	Libraries improvements	£4,536
CIL	Waste	£1,071
S106	Education	
	- Secondary school transport @ £1,205 per place	£24,100
S106	Highways	Tbc
S106	Monitoring fee (per trigger point)	£412

**1. Education.**

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for primary schools is £17,268 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£17,268 / 1.00) produces a total of £17,268 per pupil for permanent expansion of primary schools.

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for secondary schools is £23,775 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£23,775 / 1) produces a total of £23,775 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, *“further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place”*.

The school transport costs for pupils were updated in May 2020. The average annual transport cost per pupil is £1,205 for a minimum of 5 years for secondary age pupils in mainstream provision.

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

Yours sincerely,

Ruby Shepperson  
Planning Officer  
Growth, Highways & Infrastructure Directorate

cc Carol Barber, SCC (education)

Your ref: DC/19/05741/OUT  
Our ref: Fressingfield, Land Off  
Stradbroke Road, Street Farm IP21  
5PR. Matter No: 60004  
Date: 23 December 2019  
Enquiries to: Ruby Shepperson  
Tel: 01473 265063  
Email: [ruby.shepperson@suffolk.gov.uk](mailto:ruby.shepperson@suffolk.gov.uk)



**By e-mail only:**

[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)

Dear Vincent,

**Fressingfield: Land Off Stradbroke Road, Street Farm, IP21 5PR.**

I refer to the proposal: Outline Planning Application (all matters reserved) – Erection of shop (Class A1 and residential development (up to 21 dwellings including affordable housing and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.

I set out below Suffolk County Council's position, which provides our infrastructure requirements associated with the development proposed.

Summary of infrastructure requirements:

CIL	Education	Capital Contribution
	- Primary	£82,980.00
	- Secondary	£90,952.00
	- Sixth form	£22,738.00
CIL	Libraries improvements	£4,536.00
CIL	Waste	£1,071.00
S106	Education	
	- Secondary school transport	£19,200.00
S106	Highways	tbc
<b>Total Contribution: £221,477.00</b>		

This letter sets out the infrastructure requirements which arise, most of which will be covered by the district's CIL funding apart a school transport contribution to be secured by S106.

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

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

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

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

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

### **Community Infrastructure Levy**

Mid Suffolk District Council adopted a CIL Charging Schedule On 21st January 2016 and started charging CIL on planning permissions granted from 11th April 2016.

New CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) came into force on 1 September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).

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

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

- 1. Education.** Paragraph 94 of the NPPF states: ‘It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:
  - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
  - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.’

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

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

The Department for Education (DfE) publication ‘Securing developer contributions for education’ (April 2019), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised September 2019]. Paragraph 19 of the DfE guidance states, “We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including both temporary and permanent education needs where relevant, such as school transport costs and temporary school provision before a permanent new school opens within a development site”.

In paragraph 15 of the DfE guidance ‘Securing developer contributions for education’ it says, “We advise that you base the assumed cost of mainstream school places on national average costs published annually in the DfE school place scorecards. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the national average to reflect the costs in your region, using BCIS location factors”.

The most recent scorecard is 2018 and the national average school expansion build cost per pupil for primary schools is £16,596. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national expansion build cost (£16,596 x 1.00) produces a total of £16,596 per pupil for permanent expansion of primary schools.

The most recent scorecard is 2018 and the national average school expansion build cost per pupil for secondary schools is £22,738. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national expansion build cost (£22,738 x 1.00) produces a total of £22,738 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, “further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place”.

School level	Minimum pupil yield:	Required:	Cost per place £ (2016/17):
Primary school age range, 5-11:	5	5	£16,596
High school age range, 11-16:	4	4	£22,738
Sixth school age range, 16+:	1	1	£22,738

Total education <b>CIL</b> contributions:	<b>£196,670.00</b>
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The local catchment schools and capacity are Fressingfield Church of England Primary School, Stradbroke High School and Thomas Mills High School.

The existing primary school is at capacity and it is clear that the site proposal will add to challenges in terms of adding extra capacity to meet anticipated future needs arising from both latent population and housing growth. It is understood that it is possible to expand the school within its site from 140 places to 210 places whilst also improving the school operational environment.

The catchment primary School is Fressingfield. Due to this proposal, local plans, and potential approvals the school is expected to exceed capacity. On this basis, a CIL contribution of (5 pupils x £16,596) = £82,980 is sought to improve and enhance provision.

The catchment secondary school is Stradbroke High School. The forecast pupil numbers for Stradbroke High School are expected to increase annually. On this basis, a CIL contribution of (4 pupils x £22,738) = £90,952 is sought to improve and enhance provision.

Thomas Mills High School is the catchment sixth form. It is unable to accommodate potential over-surplus from Stradbroke High School as it is currently exceeding capacity, with no surplus places available for the 1 pupil arising from the development. The forecast shows this situation to worsen in future years, thus overspill from the Stradbroke into Thomas Mills is unsustainable and a CIL contribution of (1 pupil x £22,738) = £22,738 is sought for expansion to the current site.

- a) **School transport contribution** – 4 secondary-age pupils are forecast to arise from the proposed development. Developer s.106 contributions are sought to fund school transport provision for a minimum of five years for secondary-age pupils. Annual school transport cost per pupil is £960. Therefore, contribution is £960 x 4 pupils x 5 years = £19,200 increased by RPI

School transport <b>S106</b> contribution:	<b>£19,200.00</b>
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2. **Pre-school provision.** Provision for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the

term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

This matter is in the Fressingfield Ward where there is a surplus of FTEs. This proposal will generate an additional 3 FTEs, but no contribution is sought.

3. **Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A further key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.
4. **Transport issues.** Refer to the NPPF Section 9 'Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian 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.

Suffolk County Council, in its role as a local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated 2019).

Suffolk County Council FAO Sam Harvey will coordinate a response.

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

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £4,536 which will be spent on improving services and outreach at Stradbroke Library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (3 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

Libraries <b>CIL</b> contribution:	<b>£4,536.00</b>
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- 6. Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

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

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

A future CIL funding bid of £1,071 (£51 per dwelling) will be made to improve Leiston Recycling Centre facilities serving the proposed development.

Waste <b>CIL</b> Contribution:	<b>£ 1,071.00</b>
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- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

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

- 8. Sustainable Drainage Systems.** SCC, as Lead Local Flood Authority, responded on 16 December 2019, see comments by Jason Skilton.
- 9. Fire Service.** Any fire hydrant issues will need to be covered by appropriate

planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for firefighting which will allow SCC to make final consultations at the planning stage.

Please refer to letter sent on 16 December 2019 by Water Officer.

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

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

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

**12. Monitoring Fee.** The new CIL Regs allow for charging of monitoring fees. In this respect the county council charges £412 for each trigger point in a planning obligation, payable upon commencement.

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

This development will mitigate its impact by contributing via both s106 and CIL as per the summary table on page 1. Site-specific matters identified by SCC services directly will also need to be secured by way of a planning obligation or planning conditions.

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,

Ruby Shepperson  
Planning Officer  
Growth, Highways & Infrastructure Directorate – Strategic Development

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX  
[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Vincent Pearce – Planning

From: Sacha Tiller – Strategic Housing

Date: 17<sup>th</sup> December 2019

Proposal: Outline Planning Application (all matters reserved) – Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and Self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping. (M1449/17/OUT)

Location: Land Off Stradbroke Road, Street Farm, Fressingfield, IP21 5PR – DC-19-05741

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**Key Points**

**1. Background Information**

A development proposal for 21 dwellings.

The policy position is for 35% affordable housing on any site of 10 or more units or site area in excess of 0.5 hectares.

21 dwellings equates to an affordable housing contribution of 7.35 dwellings for this submission in order for it to be policy compliant.

The Outline application has cited that 21 dwellings are to be provided in total, broken down into: -

12 open market dwellings

7 affordable (5 affordable rent / 2 shared ownership)

2 dwellings for self-build

Any residual amount that does not equate to a whole dwelling will need to be provided by way of a commuted sum.

The Fressingfield Neighbourhood Plan has been on-going during 2018 and 2019. This is now at the Referendum stage and developers should have regard to this plan when deciding on the housing provision. The draft policy states:

Housing size, type and tenure

Encouragement will be given to a wide range of types of housing that meet local needs to enable a mixed and inclusive community.

Developments should provide:

- Housing for older people (e.g. Retirement living housing/supported/sheltered housing, bungalows and retirement complexes)
- Family housing – 2-3 bedrooms
- Starter homes/first time buyers
- Adaptable, 'life-time' homes
- Affordable housing

Support is given for maximising the delivery of affordable housing on all qualifying sites in Fressingfield.

It should be noted that the above housing types may not be suitably accommodated on every site.

## 2. **Housing Need Information:**

- 2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.
- 2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for 127 new affordable homes per annum. **Ref1**
- 2.3 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.
- 2.4 The Council's Choice Based Lettings system currently has circa. 690 applicants registered for affordable housing in Mid Suffolk as at April 2019. **Ref4**. There are 9 applicants registered for a housing need in Fressingfield as of September 2019. All of the applicants are looking for 1 and 2 bedroom dwellings. Please note that this site is a S106 planning obligation site therefore the affordable housing provided will be to meet the district wide need hence the **690** applicants registered is the important number.

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

- 3.1 There is strong need for homes more suited to the over 55 age brackets within the district and the supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. Mid Suffolk and the county as a whole faces a large increase in the population of over 65-year olds so we need to ensure there are suitable housing choices for older people to remain in their communities.
- 3.2 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities.
- 3.3 Broadband and satellite facilities as part of the design for all tenures should be standard to support.

3.4 All new properties need to have high levels of energy efficiency.

3.5 Details of the mix of type and size of the all the dwellings to be submitted to and approved in writing by the local planning authority.

#### **4. Preferred Mix for Open Market homes (21 dwellings).**

The open market mix should provide a mix of 2 and 3 bed dwellings for market sale with the emphasis on 2 bed dwellings and should include housing suitable for older people such as bungalows/chalet bungalows and Lifetime Homes standard homes across the site to reflect the ageing demographic profile of Mid Suffolk..

We would expect to see a minimum of 25% of the open market homes provided as 2 bed dwellings – houses or bungalows to promote choice for downsizing households and for new first-time buyers.

We would welcome a breakdown of the type and size of all proposed open market housing when possible and an understanding of the reason why a commercial dwellings is being build in the middle of this site as this is unclear.

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

##### **Affordable Rented = 5 homes required:-**

2 x 1 bed 2 person flat @ 50sqm

3 x 2 bed 4-person houses @ 79sqm

We have reduced the affordable housing mix from 3 to 2 beds in order for the gardens to be made bigger and to create curtilage parking. This type of parking will be in keeping with the open market housing to be provided onsite. Adequate parking will also need to be provided for all flats. We are concerned that having ‘block parking’ and a shop nearby will encourage shoppers to park in residents parking bays.

##### **Shared Ownership = 2 homes required:-**

2 x 2 bed 4-person houses @ 79sqm

5.1 We would expect 75% of the affordable homes to be for affordable rent and 25% for shared ownership houses and bungalows. Any residual amount that does not equate to a whole dwelling needs to be provided by way of a commuted sum.

#### **6. Self-build plots**

With regard to the proposition of building self-build plots on this site we would like to bring to the attention of the developer that each of these plots must have access to a public highway and connections for electricity, water and waste water. BMSDC have a self-build register and we would ask that the site owner contact BMSDC with regard to marketing these self-build plots to its applicants.

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

- Properties must be built to current Homes England National Housing Standards March 2015.
- The council is granted 100% nomination rights to all the affordable units on first lets and 100% on subsequent lets.
- Any Shared Ownership properties must have an initial share limit of 70%.
- The Council will not support a bid for Homes England grant funding on the affordable homes delivered as part of an open market development. Therefore, the affordable units on that part of the site must be delivered grant free.
- The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice.
- (a) not Occupy or permit Occupation of more than fifty per cent (50%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until fifty per cent (50%) of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider; and
- (b) not Occupy or permit Occupation of more than eighty per cent (80%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until all of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider
- On larger sites, the affordable housing should not be placed in groups of more than 8 units
- Adequate parking provision is made for the affordable housing units and cycle storage and bin stores.
- It is preferred that the affordable units are transferred to one of the Council's partner Registered Providers – please see [www.baberghmidsuffolk.gov.uk](http://www.baberghmidsuffolk.gov.uk) under Housing and Affordable Housing for full details.



21 May 2020

Vincent Pearce  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

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

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**Application:** DC/19/05741  
**Location:** Land Off Stradbroke Road Street Farm Fressingfield IP21 5PR  
**Proposal:** Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.

Dear Vincent,

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

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

**Summary**

We have reviewed the Addendum to Update the Ecological Assessment (Adonis Ecology Ltd, March 2020) and the Ecological Assessment (Adonis Ecology Ltd, November 2016, submitted by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species & habitats.

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

The Addendum to Update the Ecological Assessment advises they consider the revised proposals would have a very similar impact upon protected and Priority species / habitats as the original proposals, just over a smaller area, and the impact avoidance recommendations, as well as the mitigation and compensation measures of the original ecological report should still be followed.

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.



The mitigation measures identified in the Ecological Assessment (Adonis Ecology Ltd, November 2016) should be secured and implemented in full. This is necessary to conserve and enhance protected and Priority Species. This includes precautionary measures to protect reptiles, due diligence for nesting birds, general precautions to protect biodiversity, update check for 'Shepherd's Needle' prior to the start of works, compensatory hedge planting consisting of a native shrub species mix of a minimum of eight native species and compensation for loss Harvest Mouse habitat.

We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. This should follow the Institution of Lighting Professionals Guidance Note 8 Bats and artificial lighting (September 2018) and the recommendation made by the applicants' ecologist. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting. Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of the National Planning Policy Framework 2019. This includes three bat boxes, to three (two-hole boxes and one open-fronted box), native tree, shrub and hedgerow planting, and hedgehog access to gardens. The reasonable biodiversity enhancement measures should be secured via a separate Biodiversity Enhancement Strategy to be secured at reserved matters stage.

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

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

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

**Recommended conditions:**

**1. CONCURRENT WITH RESERVED MATTERS: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

*"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority, in accordance with the details contained within the details contained in the Ecological Assessment (Adonis Ecology Ltd, November 2016).*



*The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”*

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

## **2. CONCURRENT WITH RESERVED MATTERS: BIODIVERSITY ENHANCEMENT STRATEGY**

*“A Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority. This should follow the recommendations made within the Addendum to Update the Ecological Assessment (Adonis Ecology Ltd, March 2020) and Ecological Assessment (Adonis Ecology Ltd, November 2016).*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) timetable for implementation demonstrating that works are aligned with the proposed phasing of development;*
- e) persons responsible for implementing the enhancement measures;*
- f) details of initial aftercare and long-term maintenance (where relevant).*

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

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

## **3. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

*“A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly*



*sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.”*

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

Please contact me with any queries.

Yours sincerely,

**Hamish Jackson BSc (Hons) GradCIEEM MRSB**

Ecological Consultant

[ecology.placeservices@essex.gov.uk](mailto:ecology.placeservices@essex.gov.uk)

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

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



28 December 2019

Vincent Pearce  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

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

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**Application:** Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.  
**Location:** Land Off Stradbroke Road Street Farm Fressingfield IP21 5PR  
**Proposal:** DC/19/05741

Dear Vincent,

Thank you for consulting Place Services on the above application.

#### **Holding objection due to insufficient ecological information**

##### **Summary:**

We have reviewed the Ecological Assessment (Adonis Ecology Ltd, March 2017), provided by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species/habitats.

We are not satisfied that sufficient ecological information is currently available for determination of this application. This is because the Ecological Assessment (Adonis Ecology Ltd, March 2017) is out of date to accompany this application, following the Chartered Institute of Ecology and Environmental Management (CIEEM) - Advice note on the Lifespan of Ecological Reports and Surveys (April 2019) - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>.

Therefore, it is recommended that a professional ecologist will need to undertake a site visit and then review the validity of the report, which could be delivered via an addendum to the Ecological Assessment.



This further information is required to provide the LPA with certainty of impacts on protected and Priority species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to provide the additional information to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson BSc (Hons) GradCIEEM MRSB**

Ecological Consultant

[ecology.placeservices@essex.gov.uk](mailto:ecology.placeservices@essex.gov.uk)

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

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

## **BMSDC Planning Area Team Yellow**

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**From:** BMSDC Public Realm Consultation Mailbox  
**Sent:** 23 December 2019 15:43  
**To:** BMSDC Planning Area Team Yellow  
**Subject:** RE: MSDC Planning Consultation Request - DC/19/05741

**Categories:** Katherine

The Public Realm Team have no objections in principle to the proposed development of up to 21 properties off Stradbroke Road, Fressingfield. A development of this size would be expected to incorporate an appropriate area of open space and some children's play provision. If not incorporated into the detailed design then an agreed contribution to open space and play provision within the village would be required.

Regards

Dave Hughes  
Public Realm Officer

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

**From:** planningyellow@baberghmidsuffolk.gov.uk <planningyellow@baberghmidsuffolk.gov.uk>  
**Sent:** 12 December 2019 10:08  
**To:** BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>  
**Subject:** MSDC Planning Consultation Request - DC/19/05741

Please find attached planning consultation request letter relating to planning application - DC/19/05741 - Land Off Stradbroke Road , Street Farm, Fressingfield, IP21 5PR

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.

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

## **BMSDC Planning Area Team Yellow**

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**Subject:** FW: MSDC Planning Consultation Request - DC/19/05741

From: BMSDC Economic Development <BMSDCEconomicDevelopment@babberghmidsuffolk.gov.uk>  
Sent: 31 December 2019 10:58  
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>  
Subject: RE: MSDC Planning Consultation Request - DC/19/05741

Thank you for inviting Economic Development Team to comment on the above planning application.

Our comments concern the development of a dedicated shop premises as part of the application (for 21 residential units).

Economic Development support this application.

The proposal to develop purpose built retail premises to serve the growing community of Fressingfield is welcome. Local shops, public houses and businesses provide vital employment opportunities for local communities as well as services.

Although the applicant has not made detailed reference to the shop development from consultee comments it appears that the new premises are proposed to provide new accommodation for the existing Fressingfield Village Stores. The application form does identify additional jobs to be created in proposed new premises.

Best wishes  
Delia Cook  
Economic Development Officer  
Economy and Regeneration

Babergh and Mid Suffolk District Councils - Working Together  
m: 07860 827011  
delia.cook@babberghmidsuffolk.gov.uk  
www.baberghmidsuffolk.gov.uk

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

From: planningyellow@babberghmidsuffolk.gov.uk <planningyellow@babberghmidsuffolk.gov.uk>  
Sent: 12 December 2019 10:11  
To: BMSDC Economic Development <BMSDCEconomicDevelopment@babberghmidsuffolk.gov.uk>  
Subject: MSDC Planning Consultation Request - DC/19/05741

Please find attached planning consultation request letter relating to planning application - DC/19/05741 - Land Off Stradbroke Road , Street Farm, Fressingfield, IP21 5PR

Kind Regards

Planning Support Team

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

## **BMSDC Planning Area Team Yellow**

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**From:** Andy Rutson-Edwards  
**Sent:** 19 December 2019 11:16  
**To:** Vincent Pearce; BMSDC Planning Area Team Yellow; BMSDC Planning Mailbox  
**Subject:** DC/19/05741

**Categories:** Katherine

Environmental Health -  
Noise/Odour/Light/Smoke

### **APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/19/05741**

**Proposal:** Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.

**Location:** Land Off Stradbroke Road , Street Farm, Fressingfield, IP21 5PR

Thank you for consulting Environmental Protection on this application. As the outline application is for a mixed residential and commercial development I request that the following are controlled by way of condition:

1. The applicant shall provide full details of all plant (i.e. chiller units/aircon units) associated with proposed A1 development. A full acoustic assessment relating to shop activities and the plant noise from the site shall be undertaken. This assessment shall be carried out by a competent person. The assessment shall have been made in accordance with the current version of British Standard 4142 to include all deliveries to the shop and confirmation of the findings of the assessment and any recommendations shall have been submitted to the Local Planning Authority and agreed prior to the commencement of the development.
2. Prior to the any development permitted coming into beneficial use, a competent person shall have ensured that the rating level of noise emitted from all plant when running at full capacity and site activities, does not exceed the sound levels predicted at facades of noise-sensitive premises. For any measured exceedances of the predicted daytime and night time noise levels measured, a scheme of mitigation shall be submitted to, and agreed in writing by, the Local Planning Authority. This scheme shall be adhered to thereafter during the lifetime of the development being in beneficial use.

Reason – To minimise detriment to nearby residential amenity.

3. No external lighting fixtures for any purpose shall be constructed or installed until details of all external lighting proposals (to include illuminated signage) have been submitted to and approved by the local planning authority; and no lighting shall be constructed or installed other than in accordance with those approved details.

Note: The lighting assessment shall take account of all lighting on the site - details to include luminaire type, operating hours, position, height, aiming points, lighting levels and a polar luminance diagram (based on the vertical plane and marked with 5, 1 and 0 lux contour lines).

Reason – To minimise detriment to nearby residential amenity.

Other conditions required as below:

During construction of A1 unit and residential properties.

1. Noise intrusive construction/ground works along with all deliveries to the site shall be limited to the following hours: Monday to Friday between 08:00 hrs and 18:00 hrs Saturday between 08:00 hrs and 13:00 hrs. No noise intrusive work to be undertaken on a Sunday, Bank, or Public Holiday.

Reason – To minimise detriment to nearby existing residential amenity.

2. No materials produced as a result of the site development or clearance shall be burned on site. All reasonable steps, including damping down site roads, shall be taken to minimise dust and litter emissions from the site whilst works of construction and site clearance are in progress. All bulk carrying vehicles accessing the site shall be suitably sheeted to prevent nuisance from dust in transit.

Reason – To minimise detriment to nearby residential amenity.

3. Any external lighting associated with the development shall be kept to the minimum necessary for the purposes of security and site safety and shall prevent upward and outward light radiation.

Reason – To minimise detriment to nearby residential amenity

*Andy*

**Andy Rutson-Edwards, MCIEH AMIOA**

Senior Environmental Protection Officer

**Babergh and Mid Suffolk District Council - Working Together**

Tel: 01449 724727

Email [andy.rutson-edwards@baberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@baberghmidsuffolk.gov.uk)

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

**From:** Peter Chisnall  
**Sent:** 30 December 2019 15:03  
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Subject:** DC/19/05741

Dear Vincent,

Proposal: Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.

Location: Land Off Stradbroke Road , Street Farm, Fressingfield, IP21 5PR

Many thanks for your request to comment on the sustainability aspects of this application.

It is acknowledged that the application is for outline permission but considering the size of the development some consideration of this topic area is expected. 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.

Should the planning department consider setting conditions to ensure the development meets its environmental obligations the following is suggested.

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

The Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3 and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water ( suggested maximum of 105ltr per person per day). Details as to the provision for electric vehicles should also be included.

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Clear commitments and minimum standards should be declared and phrases such as 'where possible, subject to, where feasible' must not be used.

Evidence should be included where appropriate demonstrating the applicants previous good work and standards achieved in areas such as site waste management, eg what recycling rate has the applicant achieved in recent projects to show that their % recycling rate commitment is likely.

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmental-management/planning-requirements/>

<https://www.babergh.gov.uk/environment/environmental-management/planning-requirements/>

Regards,

Peter

**Peter Chisnall**, CEnv, MIEMA, CEnvH, MCIEH

Environmental Management Officer

**Babergh and Mid Suffolk District Council - Working Together**

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Chief Planning Control Officer For the attention of: DM

FROM: Nathan Pittam, Environmental Protection Team DATE 2.1.20

YOUR REF: DC/19/05741.

SUBJECT: Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access, etc

Address: Land Off, Stradbroke Road, Fressingfield, EYE, Suffolk.

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**Please find below my comments regarding contaminated land matters only.**

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

**Proposed Condition: Standard Contaminated Land Condition (CL01)**

*No development shall take place until:*

- 1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
- 2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
- 3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
- 4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

*Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.*

**It is important that the following advisory comments are included in any notes accompanying the Decision Notice:**

*“There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.*

*Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.*

*The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:*

- *Local Planning Authority*
- *Environmental Services*
- *Building Inspector*
- *Environment Agency*

*Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.*

*The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team.”*

Nathan Pittam  
Senior Environmental Management Officer

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

Sent: 02 January 2020 09:18

To: Vincent Pearce <Vincent.Pearce@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

Subject: DC/19/05741. Air Quality

Dear Vincent

EP Reference : 270275

DC/19/05741. Air Quality

Land Off, Stradbroke Road, Fressingfield, EYE, Suffolk.

Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, etc

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that the scale of development is unlikely to compromise the existing good air quality at the development site and surrounding area.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 07769 566988 / 01449 724715

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

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/19/05741	
<b>2</b>	<b>Date of Response</b>	31/12/2019	
<b>3</b>	<b>Responding Officer</b>	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.</p>  <p>OLYMPUS - 8x4MS Wide - Euro 6 - Smo</p> <p>The road surface and construction must be suitable for an RCV to drive on.</p> <p>All residential bins to be presented at edge of curtilage on map for approval.</p> <p>Location of the bin store surface to be of level threshold with suitable access to the collection point and a dropped curb if required.</p>	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
<b>7</b>	<b>Recommended conditions</b>	Meet the conditions in the discussion.	

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



## Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

AW Site Reference: 154789/1/0075150

Local Planning Authority: Mid Suffolk District

Site: Land Off Stradbroke Road Street Farm  
Fressingfield IP21 5PR

Proposal: Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with r

Planning application: DC/19/05741

**Prepared by:** Pre-Development Team

**Date:** 16 January 2020

## ASSETS

### Section 1 - Assets Affected

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

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

## WASTEWATER SERVICES

### Section 2 - Wastewater Treatment

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

### Section 3 - Used Water Network

This response has been based on the following submitted documents: Flood risk assessment. The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

### Section 4 - Surface Water Disposal

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

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

10 January 2020

Mr Vincent Pearce  
Senior Planning Officer  
Mid Suffolk District Council  
Endeavour House, 8 Russell Rd,  
Ipswich, IP1 2BX

Dear Mr Pearce,

**Planning application ref: DC/19/05741 Outline Planning Application (all matters reserved) - Erection of shop (Class A1) and residential development (up to 21 dwellings including affordable and self-build housing), construction of access road, driveways, parking areas and footpaths with related drainage and landscaping.**

#### **Land off Stradbroke Road Street Farm Fressingfield IP21 5PR**

I am writing on behalf of the Suffolk Preservation Society (SPS) to object the above outline planning application for the erection of up to 21 dwellings on a greenfield site on the southern edge of the village. This is a revised application DC/17/01449 for 85 dwellings with associated infrastructure which was refused in November 2018. SPS objected to the previous application due to the unsustainable location and the disproportionate scale of the development, taken together with other large scale housing schemes. The SPS welcomes the substantial reduction in the scale of development from 85 to 21 dwellings. We note the shift in the type and tenure of dwellings including no.7 affordables, no.3 low cost, no.2 self builds, provision/relocation of a shop and the road and drainage improvements to address identified constraints.

Notwithstanding the applicant's positive response to the numerous and compelling objections held by many to the previous scheme, the SPS continues to object on the following grounds.

The emerging Joint Local Plan downgrades Fressingfield from a Primary to a Hinterland Village which requires a lesser quantum of development, recognising that it is fundamentally a less sustainable location with fewer services and facilities than a Primary Village. Accordingly the evolving policy position in the emerging Local Plan shows a minimum housing requirement of 56 dwellings over the plan period.

Mid Suffolk, as of 3.09.19 (Mid Suffolk District Council Housing Land Supply Position Statement 2019/20 – 2023/24) asserts that the council can demonstrate a 5 year housing land supply. Therefore, the "tilted balance" presumption in favour of sustainable development does not apply and applications should be determined according to the development plan.

The Fressingfield Neighbourhood Plan (FNP) is at an advanced stage, having been through Examination and is about to go to Referendum in the coming weeks (January 2020). The FNP policy FNP1 allows for 60 dwellings across the plan period, 51 of which have already been consented. Furthermore, the FNP does not allocate this site for development. The Examiner in her report, at paragraph 53 having considered the proposed site allocations stated that *"I do not consider it necessary for inclusion of additional sites"*. In summary, the Neighbourhood Plan has been carefully considered and independently assessed. The views of the parish have been clearly made. Therefore, the policies within the plan must be given considerable weight in the consideration of this case.

## **Conclusion**

Notwithstanding the material reduction in the scale of the revised proposals and the more appropriate mix of type and tenure of dwellings which more closely reflects the local housing need, the fact remains that the site has not been identified for development through the emerging Local Plan or Neighbourhood Plan and remains disproportionate, relative to the level of growth allocated and planned for in the emerging Neighbourhood Plan. To permit this application would prejudice the policy making process by undermining the plan-led approach. Secondly, granting planning permission would undermine community confidence in the plan making process after successful Examination but in advance of a Referendum on that Plan.

The community, through the neighbourhood plan process, has clearly rejected this site for development whilst setting out alternative sites that are capable of contributing towards the housing need in the district. SPS acknowledges that the revised scheme has positively responded to the reasons for the previous refusal and it is a matter of planning judgement whether the public benefits of this scheme outweigh the concerns expressed through the emerging Neighbourhood Plan. However, on balance SPS considers that to approve this application would seriously undermine the neighbourhood planning process and we therefore urge that the proposals are yet again refused.

We trust that you will find these comments helpful in the consideration of this application.

Yours sincerely,

**Fiona Cairns RTPI IHBC**  
**Director**

Cc: Fressingfield Parish Council  
Phil Butler, SPS Mid Suffolk District  
David Burn, Portfolio Holder, Planning  
John Castro, Chair SAFE