

SOUTH PLANNING COMMITTEE – 25 JUNE 2019

DC/18/3385/FUL

EXPIRY DATE: 28 NOVEMBER 2018

MAJOR APPLICATION

APPLICANT: MR PATRICK HOCKLEY

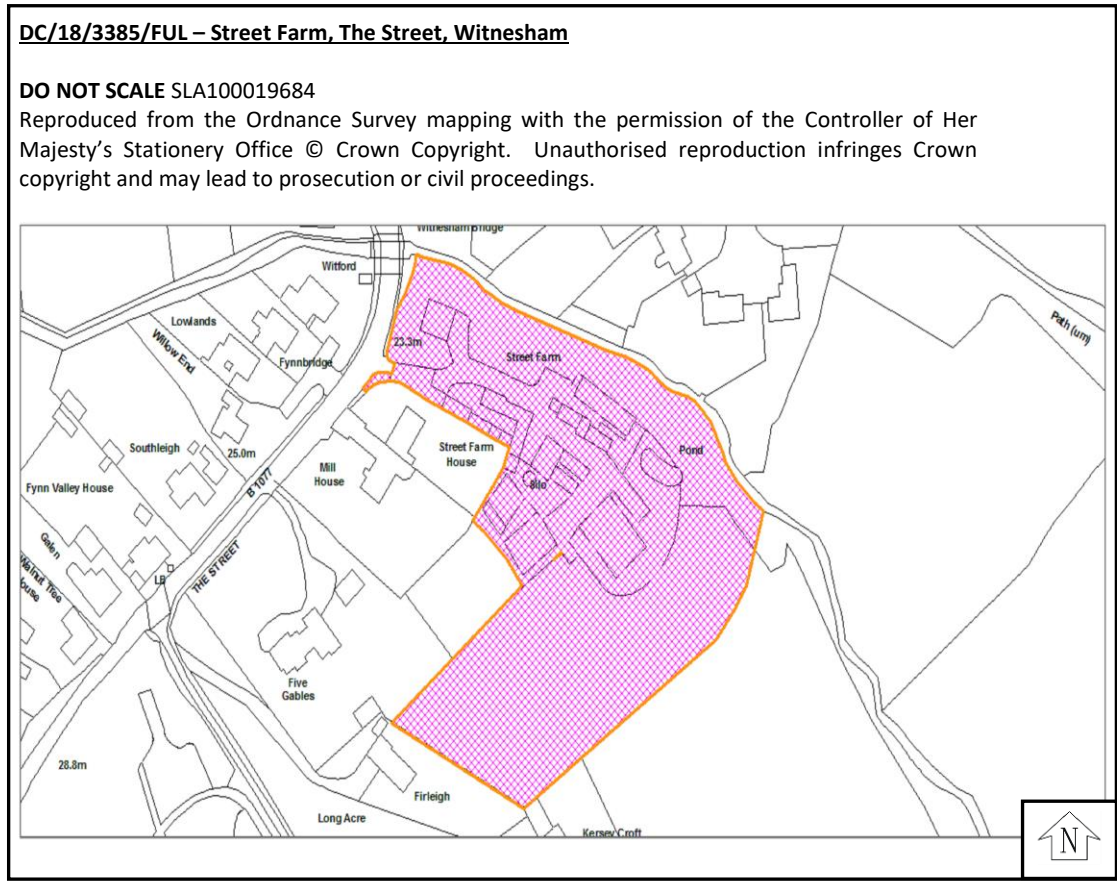
STREET FARM, THE STREET, WITNESHAM, IP6 9HG

PROPOSED RESIDENTIAL DEVELOPMENT FOR 20NO. DWELLINGS.

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1 EXECUTIVE SUMMARY

The application seeks full planning permission for the development of land at Street Farm, Witnesham to provide 20 dwellings of which seven would be affordable homes. The site area is some 1.26 hectares of which 0.7 hectares is allocated in the adopted Local Plan for the residential development of approximately 20 dwellings.

The application is before members because part of the site is in the countryside, for planning purposes, and therefore the proposed development represents a departure from the Local Plan insofar as the site area extends into the countryside beyond that which is allocated for housing, noting that a large part of the site is in the Local Plan for residential development.

In the view of officers, the proposed development is considered to accord with the objectives of the Development Plan and National Planning Policy Framework as a sustainable development. It is considered that this development proposal is acceptable in terms of flood risk; it is well-designed and sensitive to its edge-of-settlement location and nearby listed buildings; and would ultimately deliver substantial public benefits that would outweigh any dis-benefits – including a departure from the Local Plan via an extended site area. There are no objections from any statutory consultees or the Swilland & Witnesham Grouped Parish Council.

The recommendation is authority to approve subject to the signing of a Section 106 legal agreement to secure necessary planning obligations; along with the application of planning conditions to secure compliance and further details, where necessary, as detailed in the recommendation section of this report.

2 SITE DESCRIPTION

- 2.1 Witnesham is a key service centre containing a church, public house and primary school. It is four miles-or-so north of Ipswich and connected directly to it by the B1077. Witnesham is comprised of two distinct elements: the Chapel settlement, to the north; and the Bridge settlement, to the south, which is focused around the River Fynn. Each has its own distinct settlement boundary.
- 2.2 The application site, Street Farm, is broadly L-shaped and covers some 1.26 hectares to the east side of The Street (B1077). The site comprises a largely disused farm complex along with associated pasture field. The site is bound to the north by the river Fynn; to the east by agricultural land; and to the south and west by the rear gardens of residential properties at Strugglers Lane and The Street.
- 2.3 The site has an existing point of vehicle access from The Street, along with a concrete driveway that provides access to the range of derelict barns/outbuildings which formerly operated as a piggery. From the vehicle access in the west to the north-eastern corner of the site is relatively level; however, ground levels rise sharply across the site to the southwest toward existing properties at Strugglers Lane. The lowest point of the site is 22m AOD (above ordnance datum) in the north whilst at the southwestern edge the site lies at a maximum of 34m AOD.

- 2.4 Some 0.7 hectares of the northern part of the site – the lower ground comprising the disused farm buildings and hardstanding – is allocated in the adopted Development Plan for the residential development of approximately 20 units. Being allocated for housing, this area of the application site is encompassed within the Witnesham (Bridge) settlement boundary. The other 0.56 hectares of pasture field to the south/southwest is therefore countryside, for planning purposes.
- 2.5 Street Farmhouse is listed Grade II and sits adjacent the site access. It is abutted by Mill House, to the southwest, which is also listed Grade II. The site is not in a conservation area however it does fall within a local designation: a special landscape area – the Fynn river valley.
- 2.6 The majority of the application site is located within flood zone 1. However, as part of the site is adjacent to the River Fynn a proportion of the site is located within flood zones 2 and 3.

3 PROPOSAL

- 3.1 The proposed development is the demolition/clearance of the existing farm buildings and hardstanding; and the erection of twenty new dwellings along with associated works as part of a residential development of the site. The proposal also includes works to re-position and improve the existing vehicle access from The Street, along with a detailed site landscaping strategy.
- 3.2 Vehicle access would be taken from The Street in the north-western part of the site and would feed onto a main spine road running west-east across the relatively level ground, providing access to 16 of the dwellings. The spine road would then turn south and run up the slope to serve the remaining four dwellings.
- 3.3 The proposal includes a mix of property types: detached, semi-detached, apartments, bungalows and two-storey houses. The greatest mix of property type and scale is focused around the main spine road on the lower ground whilst on the higher ground, in the southwest, are the larger detached dwellings all two-storeys in scale (plots 15-18).
- 3.4 The design approach is fairly traditional and comprises a mix of house types in the Suffolk Vernacular – and the applicant’s Design & Access Statement sets out that the layout is designed to reflect the “meandering” pattern of development common in Witnesham and other Suffolk Villages.
- 3.5 The proposal includes the provision of seven affordable dwellings comprising five affordable rented properties and two shared ownership properties in a mix of 1-bedroom apartments and 2-bedroom houses.

4 CONSULTATIONS/COMMENTS

- 4.1 Swilland and Witnesham Grouped Parish Council: do not object, stating:

“The Parish Council resolved not to object to this application as it is considered to have an overriding benefit in terms of largely meeting the requirements of Local Plan policy SSP19 for the land allocated for residential use at Street Farm, Witnesham.

The application includes a mix of 1,2,3,4 and 5 bedroom dwellings, including affordable housing which is welcomed, all dwellings will be located outside Flood Zone 3 and there seems to be no impact on Listed Buildings.

The Parish Council acknowledges local concerns, particularly those from residents of Giles Way, over the potential for increased flood risk, being overlooked and the management of the river bank. There are also concerns over the visual impact of that part of the development that extends beyond the allocated land. This is on land that rises up the valley side and will have an impact on the Fynn Valley Special Landscape Area and surrounding areas.

In considering the application the District Council is asked;

- a) To ensure there is no impediment from the development to the flow of the River Fynn, nor any increase in the flood risk to other areas.*
- b) That there be an improved Landscape Plan for the development to lessen its visual impact. This should incorporate substantive bands of native river valley tree species, conditioned to grow to maturity, along the north-eastern and South-Eastern sides of the development.*
- c) Make conditions to ensure the proper future management of the river side land and tree belts.”*

4.2 Suffolk County Highways Authority: No objections to the development on highways safety grounds. Revised details of site access junction and visibility splays considered acceptable.

4.3 Suffolk Flood and Water Management (Local Lead Flood Authority): Recommend approval of the application.

The consider that the drainage strategy as a whole is acceptable subject to imposition of planning conditions to secure further details including:

- precise strategy for disposal of surface water;
- details of the long term implementation/management of the surface water disposal strategy;
- construction surface water management plan;
- and full details of all Sustainable Urban Drainage System components and piped networks to be registered on the LLFA’s Flood Risk Asset Register.

4.4 Environment Agency (final consultation response received 09 May 2019): No objections to the development proposal following extensive consultation. Conditions recommended in regard to managing development within close proximity of the watercourse. (Further details in the Flood Risk and Drainage Strategy section of this report)

- 4.5 Natural England: No objections; recommend that a suitable contribution to the Suffolk Recreational Avoidance Mitigation Strategy (RAMS) is sought to offset recreational impacts on designated European sites.
- 4.6 Suffolk County Archaeological Service: No archaeological grounds to refuse planning permission. Conditions are recommended to agree details of a programme of archaeological work.
- 4.7 Suffolk Police – Designing Out Crime Officer: No objections. Considers that the layout is well-designed with a good movement framework; minor design changes recommended within the response.
- 4.8 Suffolk Fire and Rescue Service: No objections; guidance provided on building regulations requirements and necessary consultation with water authorities at the appropriate stage.
- 4.9 Suffolk County Council Strategic Development Team: No objections. County Council infrastructure requirements set out in terms of any future bids for CIL funding (addressed in the CIL section of this report).
- 4.10 Suffolk Wildlife Trust: Object to the application due to insufficient information regarding protected and priority species and habitats (discussed further in the ecology and biodiversity section of this report).
- 4.11 Head of Environmental and Port Health – East Suffolk Council: Require further information to assess risk from ground contamination sources (conditions recommended).
- 4.12 Economic Development Team – East Suffolk Council: No comments on the application.
- 4.13 Third Party Representations : 11 local residents object to the application, in some instances in the form of multiple letters. From the formal objection representations received, the key concerns raised (inter alia) include:
- Adverse impact on outlook from existing properties at Giles Way;
 - The dwellings on the site and on higher ground will completely overlook the existing properties at Giles Way;
 - The proposed development will generate surface water run-off which will worsen flooding impacts off site. Existing properties at Giles Way have flooded in the past (photographic evidence provided of this) and the development will significantly worsen this, increasing the flood risk to these adjoining properties.
 - Due diligence has not been carried out in terms of assessing the flood risk to adjoining properties at Giles Way;
 - Properties at Giles Way extend to the north side of the river bank and the development will extend all the way to the south bank, only two metres away;
 - The proposed site access on the bend is dangerous and unsuitable for the volume of traffic arising from the development;
 - Development will erode the tranquil nature of the site in its rural environment;

- The village does not have adequate facilities to service a development this large;
- Some 40% of the site is not allocated in the Development Plan and it should not be taken for granted that this additional land is suitable;
- There are numerous other housing developments being built in the village and therefore the proposed development is not required;
- Some of the housing will be built on good quality agricultural land and therefore plots 15-18 should not be permitted;
- The height and proximity of plot 17 will adversely impact living conditions at Firleigh, Strugglers Lane;
- There will be a harmful visual impact arising from the properties on the higher ground;
- The development will generate noise which will harm local residents;
- The proposed dwellings are near overhead power lines which will be harmful to future occupiers as a potential cancer risk;
- The retained trees and hedges on the western/south-western boundary will not screen the development from Mill House and there will be mutual losses of privacy;
- Proposal will cause a loss of light to Mill House;
- The additional traffic from the site will make exiting Mill House dangerous;
- Development will ruin outlook/view from Five Gables; and
- Plot 17 will cause a significant loss of outlook and privacy to Five Gables, dwarfing it because of its two-storey scale and height.

5 PUBLICITY

5.1 The application has been subject of the following advertisement in the press:

Category	Publication date	Expiry	Publication
Major Application; Affects setting of Listed Building; and Departure from Development Plan.	20.09.2018	11.10.2018	East Anglian Daily Times

6 SITE NOTICES

6.1 The following site notice(s) have been displayed at the site:

Site Notice Type	Reason	Date Posted	Expiry Date
General Site Notice	Major Application; Affects setting of Listed Building; and Departure from Development Plan.	12.09.2018	03.10.2018

7 PLANNING POLICY

7.1 National Planning Policy Framework (2019)

7.2 East Suffolk Council - Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (adopted July 2013) ("The Core Strategy") policies:

SP1 – Sustainable Development

SP1a – Presumption in Favour of Sustainable Development

SP2 – Housing Numbers and Distribution

SP3 – New Homes

SP12 – Climate Change

SP14 – Biodiversity and Geodiversity

SP15 – Landscape and Townscape

SP17 – Green Space

SP18 – Infrastructure

SP19 – Settlement Hierarchy

SP27 – Key and Local Service Centres

SP29 – The Countryside

DM2 – Affordable Housing on Residential Sites

DM3 – Housing in the Countryside

DM19 – Parking Standards

DM21 – Design: Aesthetics

DM22 – Design: Function

DM23 – Residential Amenity

DM26 – Lighting

DM27 – Biodiversity and Geodiversity

DM28 – Flood Risk

7.3 East Suffolk Council – Suffolk Coastal Local Plan (Site Allocations and area Specific Policies, January 2017) ("The SAASP") policies:

SSP1 – New Housing Delivery (2015-2027)

SSP2 – Physical Limits Boundaries

SSP19 – Land at Street Farm, Witnesham

SSP32 - Visitor Management – European Sites

SSP38 – Special Landscape Areas

7.4 East Suffolk Council – Suffolk Coastal Final Draft Local Plan (2019) ("The Draft Local Plan") policy:

SCLP12.72 – Land at Street Farm, Witnesham (Bridge)*

*Policies contained in the draft local plan can be given only limited weight at this stage as the plan has not yet been found sound via examination.

8 PLANNING CONSIDERATIONS

8.1 Section 38(6) of the Planning and Compulsory Purchase Act requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the

Planning Acts, determination must be made in accordance with the plan unless material considerations indicate otherwise. The relevant planning policies are set out in section 7 of this report.

Principle of Development

- 8.2 Site-Specific Policy SSP19 of the adopted Local Plan sets out that the site at Street Farm is well related to the settlement and, as an old farm complex, offers the opportunity for an interesting residential development for approximately 20 dwellings. This site allocation relates to the 0.7 hectares of land – largely comprised of redundant agricultural buildings – between Street Farmhouse and the River Fynn. As an allocated site, this parcel of land is also included within the drawn settlement boundary for Witnesham (Bridge) as reflected in Policy SSP2 (physical limits boundaries) of the SAASP. In accordance with Core Strategy Policy SP19 (Settlement Hierarchy) the settlement boundaries identify those areas where new housing development is directed to and where the principle is acceptable.
- 8.3 The application site extends farther into the countryside than the 0.7 hectares of allocated land. The total site area is some 1.26 hectares encompassing pasture field to the east and south/south-west. Generally speaking, new residential development in the countryside is not supported by the Local Plan spatial strategy (as reflected in policy SP29 – The Countryside).
- 8.4 However policy SSP19 sets out that there are significant constraints at this site: the presence of listed buildings at Street Farmhouse and the Mill House; areas in higher-risk flood zones 2 & 3 adjacent the river; and the wider special landscape area designation. These constraints combine to make development of the site challenging and SSP19 identifies that this may act as a limit to the amount of new development which is ultimately acceptable. In bringing a detailed development proposal forward, the applicant has explained that a scheme of approximately 20 dwellings, including a one in three affordable housing provision, is not feasible within the bounds of the site allocation – hence the proposed site area extending beyond that into the wider countryside.
- 8.5 As such, there is some conflict with the Local Plan insofar as the proposed site area and built development extend beyond the land allocation. However, the total quantum of development at Street Farm – at 20 dwellings – is planned for in the adopted Local Plan so the departure relates to the proposed site area, rather than the total number of dwellings. In this context, officers consider that such conflict with the Local Plan should not weigh significantly against the proposal and that the principle of development can be supported – particularly so as the site in its entirety is sustainably located and well-connected to the settlement (a local service centre) and the nearby town of Ipswich.

Landscape and Visual Impact

- 8.6 The application site falls within the Fynn river valley which is a locally designated Special Landscape Area (SLA) covered by Policy SSP38 of the adopted Local Plan. In the SLA's, the policy objective is to prevent development that would have a material adverse impact on the qualities of the landscape that make it special. Where development is considered acceptable then landscape improvements are an integral part of successful development proposals. SSP38 falls under the umbrella of strategic Core Strategy Policy SP15 (Landscape and Townscape).

- 8.7 The Suffolk Coastal District Landscape Character Assessment 2018 (SCLCA) identifies that The Fynn Valley winds from Witnesham, in the west, through Playford to Bealings where the rivers Fynn and Lark converge to join the Deben Estuary at Martlesham Creek. The Fynn is a narrow inland valley landscape of largely undeveloped flood plain, its sides dotted with settlement. As is the case in Witnesham, the countryside comes right into the village along the floodplain providing an attractive setting to the village.
- 8.8 The site is located to the southern extent of Witnesham (Bridge) settlement which is essentially a cluster around the river bridge, comprising largely piecemeal twentieth century development around the more historic farmsteads. The river Fynn flows along the north-east edge of the site and, in this location, it is a narrow incised channel that also forms the boundary to existing residential at properties at Giles Way, to the north. The eastern site boundary is open to wider pasture field that is crossed by pylons and overhead power cables. The southern area of the site is on considerably higher ground than the river and is therefore visible from much farther east.
- 8.9 The applicant has commissioned a Landscape Architect to undertake a Landscape Visual Impact Assessment (LVIA) which has been reviewed by officers including the Council's Arboriculture and Landscape Manager. From a technical point of view, the LVIA is well-written and compliant with professional guidance for the writing of such reports to ensure that its conclusions are reliable.
- 8.10 In terms of wider landscape views, the site is well-contained by existing built development and vegetation to the north, south and west due to the L-shaped site running in between – and then around – the existing development at Giles Way, to the north; The Street, to the west; and Strugglers Lane, to the south. The eastern site boundary is open and the higher ground in the south is visible, but the wider landscape is rolling countryside of numerous tree lined fields which limits long ranging views to-and-from the site.
- 8.11 The LVIA establishes a study area – or a Zone of Theoretical Visibility (ZTV) – within which it is theoretically possible to view the proposed development. This area stretches 300m north of the site to the Witnesham recreation ground; 1.2km east to Clopton Road; 340m west to Hall Lane; and 260m south to Strugglers Lane.
- 8.12 With regard to effects on landscape character: the LVIA concludes that on the wider landscape setting of the site - whilst acknowledging that it is a landscape of high sensitivity - they will be negligible and, within the context of the site itself, will be slightly beneficial because of the removal of the derelict farm buildings and the introduction of new planting suited to the prevailing landscape character. Visual effects are varied depending on the proximity and location of neighbouring residential receptors. The worst affected are Firleigh, Highbrow Farm, Kersey Croft, 3 Giles Way and Redhouse Farm (slight adverse magnitude of change); and 4 Giles Way and 1 & 2 Stone Cottages (moderate and adverse). These effects would be reduced though with the establishment of mitigation planting. Effects on footpath users are considered to be negligible for the Fynn Valley Walk; and slight adverse for the short section of public right of way across the field to the east of the site. The Council's Arboriculture and Landscape Manager has reviewed the LVIA and, in combination with his knowledge of the site and its context, agrees with the conclusions in terms of landscape and visual impacts, raising no objections to the proposal.

- 8.13 It is obvious when standing within the site itself and also the gardens of neighbouring properties at Giles Way that there will be a notable change in character of the application site arising from the development, and for those residential properties adjacent that will clearly be a material change in outlook. This impact is a key concern raised by local residents objecting to the development. However, the extent of landscape and visual impacts has been robustly assessed and officers do not consider that it would be so significantly adverse that it would justify a refusal of planning permission. Furthermore, the dilapidated nature of the buildings on site along with existing planting unsuited to the landscape character type means that one could argue some visual enhancements arising from the proposed residential development of the site.
- 8.14 This proposal includes a detailed landscaping strategy comprising:
- A new native tree and hedgerow belt to the eastern site boundary;
 - Retention of tree group on the western site boundary;
 - A new area of public, green open space in the north-western area of the site to include wild flora grassland, river Birch, Alder and Willow planting along with pedestrian access to the water edge; and
 - Reinforced planting to the northern and southern site boundaries.
- 8.15 Policy SSP38 sets out that development shall not materially detract from the special qualities of the designated SLA's. In this instance, officers consider that the wider landscape and visual impacts are limited and ultimately acceptable and that the proposed landscaping strategy is well-designed and will offer some enhancements at the site to complement the river valley setting. The proposal is therefore considered acceptable in accordance with the key development plan policies SSP38 and SP15.

Design of Development

- 8.16 Core Strategy policies DM21 and DM22 seek good design that is both aesthetically pleasing and functionally sound. NPPF Chapter 12 sets out how well-designed places can be achieved:
- Good design is a key aspect of sustainable development (para. 124);
 - *“Planning decisions should ensure that developments:*
 - (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

(f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*" (para. 127), and

- *"Planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development"* (para. 130).

8.17 The applicants revised Design and Access Statement (DAS) sets out the design approach to development of the site:

"Several constraints have been taken in to account and are reflected within the design. These are:

- *The flood zone – the access road and all built form has been designed to be free from any interaction within this zone.*
- *The adjacent listed building (Street Farm House) – The new development has been setback to allow an element of 'green space' as a buffer between the listed building so as not to detract from its existing setting.*
- *Eastern countryside – It is proposed to include for a large area of landscaping to the eastern boundary to provide a 'soft' transition between the new development and the open fields.*

The layout and positioning of the new buildings are set out to reflect the 'meandering' pattern of development commonly seen throughout Witnesham and other Suffolk villages. The larger dwellings are set within the southern corner of the site and on the higher ground where development will be more visible from distance so as to not overcrowd this area and risk forming a visual blight on the countryside.

The design approach in terms of elevational treatment, again, has followed the route of Suffolk Vernacular, with simple but well detailed semi-detached cottages, to larger detached farmhouse style dwellings. The scheme will use a small but quality palette of materials with several plots incorporating coloured render and windows to provide each plot with a unique style."

8.18 The Witnesham (Bridge) settlement is characterised by a considerable amount of modern infill (nineteenth to twenty-first Century) development. There is a somewhat eclectic mix of buildings due to the piecemeal form of development during this period, although the settlement could generally be characterised by traditional dwellings: either genuine historic buildings or modern development in that style. Given that the Fynn River cuts through the settlement, development has taken place on the valley floor and sides, and then all the way up onto the flat ground above. This is obvious when standing within the high part of the application site, as views across the settlement show housing development on land of varying different heights; development at Jacks Field is on high ground as are existing properties at Mill Lane which rises steeply to the north. In this settlement context, development of this sloping site will not be out of character.

- 8.19 The site area is 1.26 hectares and 20 dwellings are proposed. This is a density of approximately 16 dwellings per hectare (dph). Paragraph 3.165 of the Core Strategy sets out that 30dph or less is low density – so this proposal is considered to be a very low density of development but wholly appropriate for its sensitive setting, landscape implications and flood risk matters.
- 8.20 The layout is well-designed. The area to the north-west of the site is to be green space connecting to the river side and this provides an attractive green gateway to the development. The dwellings being set away from the road also allows existing listed buildings adjacent to retain their road-facing prominence fronting The Street. The proposed landscaping strategy would create a new countryside edge to the eastern boundary that would be appropriate in the context of the prevailing landscape character and soften the impact of built development. This layout and landscaping approach would integrate the site into the settlement and provide that clear countryside edge which would all be read against the backdrop of existing development in the settlement, in any event.
- 8.21 In terms of the dwellings themselves, they are modern versions of traditional forms reflective of the Suffolk vernacular in terms of their composition and proposed materials finish. The main design concern by local residents relates to the larger detached dwellings on the higher ground in the southwestern area of the site (plots 15-18). Given the prominence of plots 15 and 16 on the higher ground, and the way they will present to the countryside to the east, the design of these plots has been subject to change following officer feedback. A barn-style design approach has been adopted so that these plots read more like barn conversions on the countryside edge, rather than standard residential dwellings. Whilst it is accepted that plot 17 is tall at near 9 metres to ridge, in the context of a settlement where development has taken place on the valley floor and sides, this is not inappropriate. This dwelling will be visible from wider view, but that does not necessarily result in harm. It is a generally well-designed, larger dwelling that will integrate well with the wider development and its context.
- 8.22 The NPPF sets out that design should be sympathetic to its local context. In this instance the traditional built forms and very low-density of the proposed development do just that. The site layout, landscaping strategy and individual buildings are considered to be good design in accordance with the objectives of policies DM21 and DM22 and, as set out in NPPF paragraph 130, where design is in accordance with local policy requirements, it should not be used as a reason to object to development.

Residential Amenity

- 8.23 Core Strategy policy DM23 (Residential Amenity) seeks to protect the living conditions of all affected by development and sets out that the Council will have regard to the following: (a) privacy/overlooking; (b) outlook; (c) access to daylight and sunlight; (d) noise and disturbance; (e) the resulting physical relationship with other properties; (f) light spillage, air quality and other forms of pollution; and (g) safety and security. Development will only be acceptable where it would not cause an unacceptable loss of amenity to adjoining and/or future occupiers of the development.
- 8.24 To understand the impact on neighbouring residential properties, it is critical to understand the resultant physical relationship between buildings. The table below

quantifies the key physical separation distances between the proposed plots and their nearest residential neighbour(s). The distances are measured – at the shortest distance – between the existing built dwellinghouses and the proposed dwellinghouses (excluding single storey garages).

Proposed Plot Number(s)	Nearest Neighbouring Residential Dwelling(s)	Separation Distance
20	Street Farmhouse and Mill House	30+ metres
18	Mill House	60 metres
17	Firleigh Five Gables Kersey Croft	24 metres 50 metres 25+ metres
16	Kersey Croft Firleigh	30 metres 45+ metres
6	4 Giles Way 3 Giles Way	41 metres 53 metres
4	5 Giles Way	54 metres
1	Street Farmhouse	24 metres

- 8.25 Local residents at Giles Way have objected to the development partly because of the impact on their living conditions. However, as set out, the closest physical relationship between proposed dwellings and existing dwellings at Giles Way is at least 40 metres. At this degree of separation, there would not likely be a material adverse impact on their living conditions. It is obvious that the proposal represents a change in their rear outlook but, as set out in the landscape and visual impact section of this report, that change in outlook is not considered to be so significant that it would justify a refusal of planning permission.
- 8.26 In respect of Mill House: they have also objected to the visual impact of the development on their property, including impacts on their living conditions. Again, the closest dwelling would be at least 30 metres away and, at this degree of separation, there would not likely be a materially harmful impact on their living conditions.
- 8.27 For properties at Five Gables, Firleigh and Kersey Croft, the main concern relates to plot 17. This dwelling is two-storeys in scale and located on the highest ground at the south-western part of the site. Those aforementioned neighbouring properties are also on higher ground, being at the top of the river valley slope. So, plot 17 is not on significantly higher ground than those neighbouring dwellings. Plot 17 would also be at least 24 metres from the nearest property at Firleigh, and its side and rear boundaries would be reinforced with native tree and hedgerow planting. At these separation distances and with strong, reinforced boundary screening, plot 17 is not likely to materially harm living conditions at neighbouring properties at The Street and Strugglers Lane.
- 8.28 Local residents raise the issue of noise and disturbance. In terms of the construction process, a management plan to control working hours, vibration from machinery, dust generation and movement/parking of vehicles (among other things) could limit that impact – which would be relatively short lived, in any event. In terms of noise and

disturbance generated by the development itself, no evidence has been provided that the residential development of 20 dwellings will generate significant levels of noise and disturbance; the Council's Environmental Protection Team has not raised concerns in this regard. In any event, officers consider that a development of this scale, at a low density and well-separated from neighbouring properties, is unlikely to generate significantly adverse levels of noise and disturbance that would justify a refusal of planning permission.

- 8.29 Objections also suggest that the dwellings are too close to the existing pylons/overhead power lines and that this could cause cancer and other diseases through exposure to electromagnetic fields. The World Health Organization sets out on its website for the Electromagnetic Fields (EMF) Project that despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health. In any event, the eastern edge of the site would be at least 60 metres from these pylons and overhead cables – which is much farther away from them than existing properties at Strugglers Lane. This is not considered to be health hazard for future occupiers of the dwelling.
- 8.30 It is accepted that the development of the site for housing is a notable change in outlook for neighbouring residential properties. However the layout is well-designed and the landscaping strategy designed to soften the impact of the built development which, in any event, is well-separated from the neighbouring properties. Overall, the proposal would not cause significant adverse impacts on the living conditions of neighbouring residents that would justify a refusal of planning permission.
- 8.31 In terms of future occupiers of the development, the density of development is very low and this means that the properties are spaciouly laid out with acceptable levels of amenity afforded to each of the new dwellings inclusive of semi-private curtilages; areas for parking/manoeuvring of vehicles; and domestic garaging/storage.
- 8.32 For the reasons given, the proposed development is in accordance with the residential amenity objectives of Core Strategy Policy DM23.

Flood Risk and Drainage Strategy

- 8.33 Core Strategy Policy DM28 sets out that new housing development will not be permitted in high risk flood areas.

Chapter 14 of the National Planning Policy Framework (NPPF) sets out planning for flood risk:

- Development should be directed away from areas at highest risk (para. 155).
- Local planning authorities should ensure that flood risk is not increased elsewhere and applications should be supported by a site-specific flood-risk assessment. Development proposals in higher risk areas should demonstrate that:-
 - (a) Within the site development is directed to the lowest risk areas;
 - (b) The development is appropriately flood resilient and resistant;
 - (c) The development incorporates sustainable drainage systems;
 - (d) Any residual risk can be safely managed; and
 - (e) Safe access and escape routes are provided. (para. 163)

- Major developments should incorporate sustainable drainage systems (para. 165).

- 8.34 The policy approach at a national and local level generally, therefore, is to make developments safe for all future occupiers through appropriate siting and design; and then ensure no adverse local impacts arising from the development through ensuring that development sites are well-designed incorporating sustainable drainage systems.
- 8.35 The application has been subject of extensive consultation with the Local Lead Flood Authority (LLFA) and Environment Agency (EA) in response to considerable local objection to the development proposal on the grounds of flood risk. Neighbours, particularly at Giles Way, are very concerned that the proposal will result in further flooding to their properties to the north – the rear gardens of which run right down to the river bank and lie within the floodplain. This consultation process has involved detailed assessment by officers at the EA and LLFA over a period of six months (November 2018 to May 2019) in consultation with your officers. Members should be reassured that the flood risk – both on-site to occupants of the proposed dwellings and also offsite to existing residential properties – has been fully assessed.
- 8.36 The key points from the submitted site-specific Flood Risk Assessment and consultation with the EA and LLFA are summarised:
- Bespoke hydraulic modelling has been undertaken to establish the risk to the site in terms of potential depths and locations of flooding. A detailed review of this modelling was undertaken by specialists at the EA;
 - The watercourse has been modelled in a range of flooding events including the 1in20 (5%), 1in100 (1%), and 1in1000 (0.1%) year events – both including the addition of climate change;
 - All built development has been sequentially sited in flood zone 1 (the lowest risk area suitable for all land uses);
 - The finished ground floor levels of the dwellings are proposed at 23.49m AOD – which is above the 1in100 annual probability flood level including climate change;
 - The land for the houses is above 1in1000 climate change annual probability flood level; and
 - Therefore this proposal has a safe means of access in the event of flooding from all new buildings to an area wholly outside the floodplain up to a 1%(1in100) annual probability including climate change flood event.
- 8.37 With this in mind, the proposed development is considered acceptable in terms of on-site flood risk in accordance with the objectives of Core Strategy policy DM28.
- 8.38 The EA has recommended certain conditions on any planning permission to require that the fence lines dividing the gardens intersecting the river Fynn must be permeable and incorporate removable sections. This is to allow the free flow of water in the floodplain; and ease of access for the EA within this area in the event of an emergency. A second recommended condition relates to the restricting the presence of any physical solid objects within the buffer zone (4 metres) immediately adjacent the river. This could be taken care of through a removal of permitted development rights for such structures. All proposed dwellings have also been moved at least 8 metres away from the watercourse in line with EA recommendations.

- 8.39 In terms of surface water drainage, the site is proposing to infiltrate surface water in areas where this is feasible and this has been proven by infiltration testing. In light of these infiltration test results and assessment of the underlying geology, in the areas of granular deposits (plots 12-20), the strategy will involve roof runoff being directed to soakaways in the rear gardens. The runoff from the shared access road serving these properties will be collected via channels and gullies and then directed into a series of soakaways.
- 8.40 Infiltration is not possible for parts of the site adjacent to the watercourse due to the ground deposits. As such, the runoff water from the dwellings in this area (plots 1-11) and the shared access roads is proposed to be piped into a surface water attenuation basin located in the north-western corner of the site before being discharged into the adjacent river. This is in compliance with national and local guidance and the location of the basin is considered to be acceptable following detailed assessment of the adjacent watercourse.
- 8.41 To summarise, the implications of flood risk from both fluvial and pluvial sources have been subject of detailed assessment in consultation with the two statutory consultees. Following further investigation and amendments to the proposed development, there are no objections from these statutory bodies. The concerns of local residents on flood risk have been taken seriously, hence the protracted consultation period on this matter – however officers consider that this has been addressed. Thus, the development proposal is in accordance with the flood risk prevention objectives of policy DM28 and NPPF paragraphs 155, 163 and 165.

Highways Safety

- 8.42 There is an existing access to the site from The Street (B1077) that has been used for agricultural operations when Street Farm was a working farmstead. The access is still used at a low-level in connection with Street Farmhouse. It is likely that when the site was a working farm that there would have been a relatively intense use of this access by vehicles, including HGVs. Although that use has ceased, it is one that could potentially recommence at any time and the highways impacts of that uncontrolled agricultural use is a material consideration.
- 8.43 In any event, the development proposal involves re-positioning the site access slightly to the north, which actually locates the site access at the apex of the road bend, which curves away from the site in both directions. The result of this is that the visibility would be good: 90 metres in each direction from a position 2.4 metres back from the edge of the carriageway; detailed plans demonstrating this have been provided and the County Highways Authority confirm that this is acceptable.
- 8.44 Core Strategy Policy DM22 promotes design that is functionally successful and Chapter 9 of the National Planning Policy Framework (NPPF) provides clear guidance on considering development proposals:

Paragraph 108 - *“it should be ensured that... (b) safe and suitable access to the site can be achieved for all users”*; and

Paragraph 109 - *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

- 8.45 In this instance, the visibility from the proposed junction would be good and there are no objections from the County Highways Authority in their role as statutory consultee. Whilst the access concerns raised by local residents are understood, this has been considered fully and there would be no significant adverse highways impacts arising from this proposal that would justify a refusal of planning permission on highways grounds. Thus, the proposal accords with policy DM21 and the highways objectives of the NPPF.

Heritage Impact

- 8.46 The Planning (Listed Buildings and Conservation Areas) Act 1990 (“The Act”) sets out, in section 66, the statutory duty of decision-takers in respect of listed buildings:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 8.47 This statutory requirement is reflected in chapter 16 of the NPPF which sets out (inter alia):

- That heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (para. 184);
- That applicants should describe the significance of any heritage assets affected, including any contribution made by their setting (para. 189);
- That great weight should be given to the conservation of heritage asset’s and, the more significant the asset, the greater the weight should be (para. 193);
- That any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification; and
- That where harm would arise, it must be properly weighed against the public benefits of the development (paras. 195 &196).

- 8.48 The applicant has provided a Heritage Impact Assessment (HIA) that meets the requirements of NPPF paragraph 189. The HIA correctly identifies that the buildings on site proposed for demolition are relatively unimportant 19th and 20th century, utilitarian and generally dilapidated buildings that are not curtilage listed. The HIA therefore considers the impact on the setting of designated heritage assets: adjacent and to the south of the site at Street Farmhouse and Mill House (listed grade II); and four more remotely located listed buildings at Millfield Cottage, Nos 1&2 Hall Lane, and Red House at Tuddenham Lane. The HIA concludes that the proposal would cause a low level of less-than-substantial harm to the significance of the grade II listed buildings at Mill House and Street Farmhouse; officers will consider the impacts on those buildings in the following paragraphs. With regard to the other listed buildings considered (as above), the HIA concludes that because of the topography, orientation, distance and interposed foreground masking by other buildings or by well established field boundary, river bank and curtilage landscaping, that there would be no material impact on the setting or

significance of their special architectural and historic interest; officers agree with this assessment and conclude that there would be no harm to the significance of these listed buildings arising from the development proposal.

- 8.49 Street Farmhouse (listed as The Cherries) is a two-storey building that abuts the grade II listed Mill House; both lie adjacent the site to the south and west. These buildings have formal rear curtilages that are bound to the rear by an existing tree belt (at the Mill House) and by modern, utilitarian agricultural buildings at Street Farmhouse. In respect of these listed buildings the majority of the site is allocated for housing in the Local Plan with that allocation found to be sound through examination. In that sense, a degree of impact on the significance of these listed buildings has already been assessed and found acceptable.
- 8.50 In any event, looking at the detailed development proposal, it is clear that a degree of setting impact would arise - primarily this is because the site is currently agricultural land which would be developed for housing: a notable change in character away from its historical land use as part of the setting of these listed buildings. However, there is a substantial tree belt to the rear of Mill House which will largely screen the development in the southwestern area of the site. In respect of both buildings, the development to the east/north-east part of the site will be visible, although it would replace dilapidated and unsightly agricultural buildings which are considered to detract from the setting of these listed buildings. One could argue that their replacement with a well-designed residential development would offer some setting enhancements.
- 8.51 Taking a conservative view, and with regard to the conclusions of the HIA, it seems reasonable to conclude that the proposed development will result in some harm to the significance of the adjacent listed buildings through major development within their setting. In NPPF terms, this would be a low level of less-than-substantial harm. Even though low in magnitude, this harm must be given great weight by the decision-taker and properly weighed against the public benefits of the proposal. For the purposes of this recommendation, that balance will be undertaken in the concluding section of this report.

Ecology and Biodiversity

- 8.52 Suffolk Wildlife Trust objected to the application due to lack of surveying of the site for its ecological for priority/protected species. The applicant has since carried out a Preliminary Ecological Appraisal (PEA) of the site in line with their recommendations. The PEA incorporates a Phase I Habitat Survey; an eDNA Survey; and sampling of aquatic invertebrates. The buildings to be demolished have also been separately assessed for evidence of roosting bats and Barn Owl.
- 8.53 On the site itself, the site assessments identify that no further survey work is required in respect of: bats; breeding birds; badger and European hedgehog; Great Crested Newts (GCN) and amphibians; terrestrial invertebrates; otter and water vole; Eel aquatic invertebrates and fish; and reptiles.
- 8.54 It is identified that within the existing river bank vegetation there is the presence of non-native invasive species planting of Himalayan Balsam and Cotoneaster; these will need to be removed. The PEA recommends that this be replaced with a native, non-invasive species. The PEA also recommends that the majority of the river bank vegetation should

be retained for its habitat value to Otter, Water Vole, and Riparian & Terrestrial species. The detailed landscaping strategy sets out that the existing river bank vegetation will be replaced by a comprehensive new boundary of hedgerow and tree planting suitable for the local landscape character – native species in accordance with the PEA. So, although the short term loss of the river bank vegetation is unfortunate, the removal of invasive species in this location and replacement with native species will, in the longer term, establish a more appropriate habitat suitable for the prevailing landscape character.

- 8.55 The site has been fully assessed in terms of priority/protected species. There is no further survey work required and recommendations within the PEA can be secured by suitably worded planning condition, where necessary. On this basis, the on site impacts of development accord with the objectives of Core Strategy policies DM27 and SP14.
- 8.56 The Conservation of Habitats and Species Regulations 2017 (“Habitats Regulations”) lays down the legislation on the conservation of natural habitats and of wild fauna and flora. The Habitats Regulations require the competent authority (in this instance, the Council) to determine whether the development is likely to have a significant effect on the interest features of European sites protected under the legislation and, if there would be, to carry out an Appropriate Assessment of the implications of the proposal for the site’s conservation objectives in accordance with the regulations. The applicant has provided a ‘shadow’ Habitats Regulations Assessment to inform such an assessment and Natural England have also been consulted in their statutory role.
- 8.57 The application site is located within 13km of three European sites:
- The Stour and Orwell Estuaries SPA and Ramsar Site (8km south of the site);
 - The Deben Estuary SPA and Ramsar site (8km east/south-east of the site); and
 - The Sandlings SPA (12km east of the site).
- 8.58 At these distances, the proposed development is not likely to directly impact upon the interest features of these European sites through habitat loss, physical damage etc. However, the emerging Suffolk Recreational Avoidance Mitigation Strategy sets out that new residential development within a 13km zone of influence (ZOI) of European sites is likely to have a significant effect – when considered either alone or in combination with other new housing - on the interest features of those sites through increased recreational pressure in terms of dog walking, water sports, hiking etc. Natural England recommend that a suitable per-dwelling financial contribution is sought to offset such recreational impacts.
- 8.59 Officers have carried out an Appropriate Assessment and conclude that, at this scale of development (less than 50 dwellings) and at the distances from the affected European sites as set out, the recreational impacts of the proposed development could be properly mitigated by a per-dwelling financial contribution to the Suffolk RAMS and, with this mitigation secured, the proposal would not likely have significant effects on the aforementioned European sites. On this basis, the proposal accords with the objectives of Core Strategy policies SP14 and DM27 (Biodiversity and Geodiversity), in addition to the objectives of SAASP policy SSP32 (Visitor Management – European Sites).

Affordable Housing Provision and Housing Mix

8.60 The proposal includes the provision of seven affordable dwellings comprising five affordable rented properties and two shared ownership properties in a mix of 1-bedroom apartments and 2-bedroom houses. On major developments (10 or more dwellings) the policy-required affordable housing provision is for 1 in 3 units to be affordable. In this instance, 35% of the dwellings would be affordable in a policy compliant provision. Such a provision would need to be secured through a S.106 planning obligation, should permission be granted.

8.61 The proposed housing mix comprises:

Bedrooms	1	2	3	4+
Open Market Housing	0	2	7	4
Affordable Housing	3	4	0	0
All sectors	3	6	7	4
Percentage of Development	15%	30%	35%	20%

8.62 The housing mix is considered to broadly accord with the target proportions set out in Core Strategy policies SP3 and DM2. The proposal would also provide a mix of housing type including detached, semi-detached, single storey, two-storey and first floor apartments. The proposal is, on the whole, considered to provide a policy compliant mix of housing type and tenure to meet the varied needs of the local population.

Other Matters

8.63 The County Council Archaeological Service (SCCAS) has been consulted on the application. SCCAS identify that the site lies within an area of archaeological potential where there is high potential for the discovery of below-ground heritage assets of archaeological importance. There are no grounds to refuse planning permission on archaeological conservation, but planning conditions would need to be applied to any permission securing an appropriate programme of investigation and recording in accordance with the National Planning Policy Framework.

8.64 The Council's Environmental Protection Team has requested further ground contamination investigation through a phase II survey. This – along with any required remediative works – should be secured by condition, should planning permission be granted.

Community Infrastructure Levy (CIL)

8.65 The application site is in the high CIL charging zone of £199.18 per square metre of chargeable floor space. The total gross internal floor space proposed is 1850 square metres, of which 450 square metres of social housing which is thus exempt. The resultant CIL liability arising from this development, therefore, would be £272,877.05.

8.66 The County Council Strategic Planning Team has considered the impact of the development on infrastructure requirements in terms of education; pre-school provision;

library facilities; and waste management. The County Council have calculated that they will be making a CIL funding bid for a capital contribution of £167,236, of which the CIL liability from this development (as set out above) would cover.

Public Benefits of the Development

8.67 The proposed development would bring the following public benefits:

- 20 new dwellings in a sustainable location;
- Provision of seven affordable homes;
- A mix of housing type, size and tenure in accordance with policy requirements;
- Short-term local construction jobs;
- Longer term support for local shops/services through occupant spend;
- Replacement of dilapidated, derelict buildings with a well-designed residential development; and
- Enhanced landscaping strategy inclusive of planting more appropriate for the prevailing landscape character type.

9 PLANNING BALANCE AND CONCLUSION

9.1 The adopted Local Plan allocates land at Street Farm for the development of approximately 20 dwellings. Whilst the site area extending beyond that allocation represents a departure from the Local Plan, the number of dwellings is in accordance with the planned approach and - given the sustainable location of the site - it is considered that such a departure should not weigh heavily against the proposal.

9.2 There would be a low level of less-than-substantial harm to the significance of Mill House and Street Farmhouse through major development within their setting, which must be given great weight by the decision-taker. There would also be some harm to the outlook from adjacent residential properties at Giles Way, The Street and Strugglers Lane.

9.3 On the other hand, the proposed development is well-designed and incorporates a comprehensive landscaping strategy suitable for the prevailing landscape character of the river valley location. There would be some visual enhancements arising from the removal/clearance of the dilapidated farm complex and replacement with well-designed dwellings and appropriate landscaping. There would also be substantial public benefits as set out above – most notably the creation of 20 dwellings in a sustainable location; the provision of seven affordable homes; and positive local economic impacts.

9.4 The concerns raised by local residents are understood although many of those objections reject the principle of development – which has been largely established by the site allocation.

9.5 Weighing up all these matters, the proposal delivers substantial public benefits that would significantly and demonstrably outweigh any harm that would arise. On balance, therefore, the proposal is sustainable development in accordance with the broad objectives of the National Planning Policy Framework and the adopted Local Plan. Planning permission should therefore be granted.

10 RECOMMENDATION

- 10.1 **AUTHORITY TO APPROVE**, subject to a S106 legal agreement to secure affordable housing provision; per-dwelling financial contribution to the Suffolk RAMS; and details of the long-term management and maintenance of the site.

The following planning conditions are also recommended:

- 1) The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

- 2) The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- Drawing Nos. 001, 005, 006, 006, 007, 008, 009, 011, 012, 013 and 014, received 13 August 2018;
- CGI images - drawing no. 015, received 04 September 2018;
- Drawing Nos. 004 revA, 010 revB, 017 revA and 019, received 17 December 2018;
- Drawing No. 1140 (Street Farm Landscaping Strategy), received 20 December 2018;
- Proposed Site Layout Drawing No. 002 revD, received 06 February 2019;
- Flood Risk Assessment and Drainage Strategy, and Design & Access Statement, received 15 March 2019; and
- Preliminary Ecological Appraisal (Castle Hill Ecology, 2018), received 03 June 2019.

Reason: For the avoidance of doubt and to secure a properly planned development.

- 3) No development shall take place until precise details of the materials to be used in the construction of the external surfaces of the approved dwellings and garages have been submitted to and approved in writing by the local planning authority. Development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure a high quality finish in the interest of securing good design in accordance with Core Strategy design policy DM21 (Design: Aesthetics).

- 4) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:

- the parking of vehicles of site operatives and visitors;
- loading and unloading of plant and materials;
- storage of plant and materials used in constructing the development;
- the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- wheel washing facilities;
- measures to control the emission of dust and dirt during construction;
- a scheme for recycling/disposing of waste resulting from demolition and construction works; and
- delivery, demolition and construction working hours.

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

Reason: In the interest of local amenity and protection of the local environment during construction.

- 5) No development shall take place within the site until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a) The programme and methodology of site investigation and recording;
- b) The programme for post investigation assessment;
- c) Provision to be made for analysis of the site investigation and recording;
- d) Provision to be made for the publication and dissemination of the analysis and records of the site investigation;
- e) Provision to be made for archive deposition of the analysis and records of the site investigation;
- f) Nomination of a competent person or persons/organisation to undertake the works set out within the WSI.

The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the site boundary from impacts relating to groundworks and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by the development.

- 6) No development shall commence until precise details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the development can be adequately drained.

- 7) No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

- 8) No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction.

The approved CSWMP and shall include:

Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction.

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan.

- 9) No site clearance, preparatory work or development shall take place until a scheme for the protection of the retained trees (as shown on Drawing No.1140 Street Farm Landscaping Strategy) and the appropriate working methods in accordance with British Standard BS5837: Trees in relation to design, demolition and construction - Recommendations (or in an equivalent British Standard if replaced) shall have been submitted to and approved in writing by the local planning authority. The scheme for the protection of the retained trees shall be carried out as approved.
[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars].

Reason: To ensure that trees on and around the site are not damaged through the construction of the development.

- 10) No works or development shall commence until a full specification of all proposed tree and hedge planting has been submitted to and approved in writing by the local planning authority. The specification shall include the quantity, size, species, and positions or density of all trees to be planted, how they will be planted and protected and the proposed time of planting. The tree planting shall be carried out in accordance with the approved specification unless otherwise approved in writing by the Local Planning Authority.
Reason: To ensure a well laid out scheme of landscaping in the interest of good design and preserving the special qualities of the river valley location.

- 11) No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a site investigation consisting of the following components has been submitted to and approved by the local planning authority:

As deemed necessary following the desk study and site reconnaissance an intrusive investigation(s), including:

- the locations and nature of sampling points (including logs with descriptions of the materials encountered) and justification for the sampling strategy;
- an explanation and justification for the analytical strategy;
- a revised conceptual site model; and
- a revised assessment of the risks posed from contamination at the site to relevant receptors, including: human health, ground waters, surface waters, ecological systems and property (both existing and proposed).

All site investigations must be undertaken by a competent person and conform with current guidance and best practice, including: BS 10175:2011+A1:2013 and CLR11.

Reason: To ensure that risks from land contamination are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

12) No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a detailed remediation method statement (RMS) has been submitted to and approved by the LPA. The RMS must include, but is not limited to:

- details of all works to be undertaken including proposed methodologies, drawings and plans, materials, specifications and site management procedures;
- an explanation, including justification, for the selection of the proposed remediation methodology(ies);
- proposed remediation objectives and remediation criteria; and
- proposals for validating the remediation and, where appropriate, for future maintenance and monitoring.

The RMS must be prepared by a competent person and conform to current guidance and best practice, including CLR11.

Reason: To ensure that risks from land contamination are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

13) No development shall take place until full details of the finished levels of the development ('The Levels Plan'), above ordnance datum, has been provided and approved in writing by the Local Planning Authority.

The levels plan must include precise details of all earthworks showing existing and proposed finished levels or contours; proposed floor levels of all the proposed buildings, in relation to ground levels; and proposed levels of all areas of hard landscaping across the site. This plan must also include site sections to demonstrate this.

The development shall be carried out in accordance with the approved details.

Reason: Due to the sloping nature of the site, further precise details are required to understand the relative levels where development will take place.

14) The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

15) Prior to any occupation or use of the approved development the RMS approved under condition 5 must be completed in its entirety. The LPA must be given two weeks written notification prior to the commencement of the remedial works.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

- 16) A validation report must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development. The validation report must include, but is not limited to:
- results of sampling and monitoring carried out to demonstrate that the site remediation criteria have been met;
 - evidence that any RMS approved in pursuance of conditions appended to this consent has been carried out competently, effectively and in its entirety; and
 - evidence that remediation has been effective and that, as a minimum, the site will not qualify as contaminated land as defined by Part 2A of the Environmental Protection Act 1990.
- Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.
- 17) No other part of the development shall be commenced until the new vehicular access onto The Street (B1077) has been laid out and completed to at least Binder course level or better in accordance with the approved Road Details Plan (Drawing No. 019) and been made available for use. The access shall be fully completed prior to final occupation and thereafter be retained in the specified form.
- Reason: To ensure that the access is designed and constructed to an appropriate standard and made available at the right time.
- 18) Before the approved access is first used, visibility splays shall be provided as shown on Drawing Nos. 019 and 002 revD with an X dimension of 2.4 metres; and a Y dimension of 90 metres; and thereafter retained in the specified form. Notwithstanding the provisions of Schedule Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.
- Reason: To ensure vehicles exiting the drive have sufficient visibility to safely enter the public highway.
- 19) The use shall not commence until the areas within the site on Drawing Nos. 019 and 002revD for the purposes of loading, unloading, manoeuvring and parking of vehicles have been provided and thereafter those areas shall be retained and used for no other purposes.
- Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety
- 20) In accordance with the details in the submitted Preliminary Ecological Appraisal (November 2018), the recommended methods of working in Chapter 6 (in respect of conserving Bats, Breeding Birds, Terrestrial Invertebrates, Reptiles and Barn Owl) shall be adhered to during the site clearance, demolition and period of construction.
- Reason: To ensure that any impacts on priority/protected species are minimised during.
- 21) In accordance with the recommended habitat enhancements in the submitted Preliminary Ecological Appraisal, the development shall include:
- The erection of two bird boxes on mature trees within the south-western tree line, which should be a minimum of 4 metres above ground level; and
 - The inclusion of one integrated bat box in each of the detached and semi-detached buildings. The boxes shall be a minimum of 4 metres above ground level and on south-east to south-west orientations.

Reason: To ensure that the proposal delivers habitats enhancements in accordance with the objectives of Core Strategy Policies SP14 and DM27 (Biodiversity and Geodiversity).

- 22) All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the first dwelling or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: To ensure the landscaping strategy is implemented in a timely manner.

- 23) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that risks from land contamination are minimised, in the event that unexpected contamination is found.

- 24) Prior to the construction of the dwellings at plots 1-11, details of the boundary fences that divide the residential gardens intersecting the river Fynn shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented in full and thereafter retained in the approved form.

Reason: To ensure these fences are permeable (to allow the flow of water) and incorporate removable sections/panels to enable emergency access to the watercourse for the Environment Agency.

- 25) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), there shall be no new outbuildings/garages and sheds; areas of hardstanding; and gates, fences and walls erected within the rear gardens of plots 1-11 unless express planning permission is obtained for such development from the Local Planning Authority.

Reason: Physical objects and development in this area may obstruct flood flows which would increase flood risk both on and off-site. Clear access to the watercourse also needs to be retained for the Environment Agency.

BACKGROUND See application ref DC/18/3385/FUL:

INFORMATION: <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=PDEK0JQXKFM00>