

Forest Heath District Council

**DEVELOPMENT
CONTROL
COMMITTEE**

3 SEPTEMBER 2014

DEV14/131

**Report of the Head of Planning and Regulatory
Services**

**PLANNING APPLICATION DC/13/0660/FUL – LAND OFF BRISCOE WAY,
LAKENHEATH**

Synopsis:

Application under the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990 and associated matters.

Recommendation:

It is recommended that the Committee determine the attached application and associated matters.

CONTACT OFFICER

Gareth Durrant (Case Officer)
Tel: (01284) 757345

Committee Report - DC/13/0660/FUL

Date: 14 November **Expiry Date:** 13 February 2014
Registered: 2013

Case Officer: Gareth Durrant **Recommendation:** Grant planning permission

Parish: Lakenheath **Ward:** Lakenheath

Proposal: Erection of 67 dwellings (including 20 affordable dwellings) together with 1500sqm of public open space.

Site: Land off Briscoe Way, Lakenheath

Applicant: Bennett plc

Background:

This application is referred to the Development Control Committee as it is a proposal for 'major' development. Furthermore the recommendation to grant planning permission is contrary to the provisions of the extant Development Plan. The proposal also raises complex planning issues of District wide importance.

The proposals are considered to comply with the relevant policies of the National Planning Policy Framework but the 'countryside' location of the site means the proposed housing development conflicts with adopted Development Plan policies.

The application was first reported to Development Committee on 14 May 2014, but following receipt of late representations on behalf of the Parish Council and Suffolk County Council, the item was withdrawn from the agenda prior to being considered by Members.

The application is recommended for conditional approval following completion of a S106 Agreement.

Proposal:

1. Detailed (full) planning permission is sought for the erection of 67 dwellings. The development would be served by a single vehicular access to Briscoe Way via the southern boundary of the site. There is a further access from Burrow Drive, also through the south boundary, although this would be restricted to pedestrian/cycle/emergency vehicle use.
2. Details of the numbers, mix and heights of the dwellings, bungalows and flats are provided in the table below.

Name	Type	No. on site	No. of beds	Approx. height
Fincham	Bungalow	4	2	5 metres
Henley	2- storeys	8	4	8.3m
Walsingham	Bungalow	3	3	5.3m
Oulton	2 - storeys	1	4	8.6m
Sandringham	Bungalow	5	3	5.7m
Ellingham	2 - storeys	9	3	8.3m
Boston	Bungalow	2	3	5.75m
Lincoln	2 - storeys	3	4	9.0m
Haughley	2 - storeys	1	4	9.0m
Ixworth	2 - storeys	2	4	8.6m
Harpley	Bungalow	4	3	5.5m
Glemsford	Chalet bung	5	3	6.85m
Affordable	Flat	12	1	8.6m
Affordable	Flat	6	2	9.4m
Affordable	2-storeys	2	2	9.0m

3. A small palette of external building materials has been selected. These are as follows;
 - Bricks – i) TBS Olde English Red Multi's, ii) Camtech Barley Red handmade, iii) Camtech Anglian Cream Stock
 - Roof tiles – (all interlocking concrete double pantiles) i) Redland Grovebury Breckland Brown, ii) Redland Grovebury Breckland Black, iii) Redland Grovebury Farmhouse Red
4. Minor amendments were made to the application (received December 2013) involving some changes to the internal roads and design of some of the house types in response to comments received from the Local Highway Authority. These were not the subject of full re-consultation given their minor nature but further comments from the Highway Authority have been sought and received. These are reported below.
5. A noise assessment was completed and submitted in February 2014 after the planning application was registered. The report was prepared in the light of some local concerns that aircraft using the Lakenheath airbase could have a negative impact upon the proposed development. The report has been the subject of re-consultation with the Council's Environmental Health Team and their comments in response are reported below.
6. In April 2014 plans illustrating some amendments to some of the affordable housing units were received following negotiations with the Council's Strategic Housing Team.

Application Supporting Material:

7. The planning application is accompanied by the following drawings and reports:

- Drawings (Location Plan, Block Plan, Roof Plan, Tree Survey, Dwelling & Garage Elevations & Floorplans and Streetscene Drawings)
- Planning Statement
- Design and Access Statement
- Transport Statement
- Archaeological Evaluation Report
- Flood Risk Assessment
- Phase I Contamination Report
- Phase I Habitat Survey
- Statement of Community Involvement
- Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement and Tree Protection Plan
- Noise report

8. These documents are available to view on the Council's website.

Site Details:

9. The site is situated at the north end of the village and is accessed from the B1112 via Briscoe Way which itself serves a relatively modern housing estate of bungalows, chalet bungalows and two-storey houses. The site has no road frontage other than at its existing access points to Briscoe Way and Burrow Drive.
10. It extends to 2.43 hectares and is presently in agricultural use (Grade 3). The north and west site boundaries are unmarked given that the site is part of an existing field. The larger field is shielded by existing semi mature planting which visually encloses it from open countryside beyond. The east and south boundaries abut the gardens of properties in Drift Road, Briscoe Way and Burrow Drive and are marked by domestic scale planting and fencing. The land is relatively flat with no significant deviations in ground levels.
11. The site is situated outside the settlement boundary for Lakenheath, which terminates along the south boundary. The site is thus deemed to be in the countryside for the purposes of extant planning policies.
12. There are no landscape or heritage asset designations at the site, although the Lakenheath Conservation Area is situated approximately 275 metres to the south (terminating at the frontage of Lakenheath Hall to the south of the Briscoe Way junction onto the B1112). The Environment Agency flood risk maps indicate that the site is situated within Flood Zone 1 (with little or no risk of flooding).

Relevant Planning History:

13. There is no relevant planning history for this site.

Consultations:

14. **Natural England – no objections** and comment as follows;
- This application is in close proximity to the Lakenheath Poors Fen and Pashford Poors Fen, Lakenheath Sites of Special Scientific Interest (SSSIs). Natural England is satisfied that the proposed development

being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which these sites have been notified. We therefore advise your authority that these SSSIs do not represent a constraint in determining this application.

- This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework.
- This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature.

15. **Environment Agency – no objections** and provide the following comments (summarised):

- The site is located within Flood Zone 1 (low risk) on our flood maps, and within a Principal Aquifer.
- We have reviewed the information submitted and have no objection to the proposed development, subject to the imposition of a condition to require precise details of a surface water drainage scheme (for approval and implementation).

16. **Anglian Water Services Ltd – no objections** and comment as follows;

- There are assets (drainage infrastructure) 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 or may need to be re-located at the developers' expense.
- The foul drainage from this development is in the catchment of Lakenheath STW that will have available capacity for these flows.
- The sewerage system at present has available capacity for flows generated by this development.
- The preferred method of surface water disposal would be to a sustainable drainage system (SUDS) with connection to sewer seen as the last option. The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is acceptable. We will request that the agreed strategy is reflected in the planning approval.
- A planning condition is recommended to ensure the surface water system is installed at the site.

17. **NHS Property Services – no objection** [*and do not request a S106 contribution towards health provision*].

18. **Lakenheath Internal Drainage Board – no objections** and comment that the site is outside the Lakenheath Internal Drainage Board District and not in an area that drains into it.
19. **Suffolk County Council (Highways Development Management) – comments** (initial comments) that following informal discussions with the developer the submission of some drawings illustrating amendments to the layout are expected. These are awaited before formal comment is made.
20. **Suffolk County Council (Highways Development Management)** (following submission of amended drawings) **no objections**, subject to the imposition of conditions to secure precise details of estate roads, turning spaces and cycle storage are submitted and thereafter provided.
21. **Suffolk County Council (Archaeological Service) – no objections** and comments; the site was subject to a full archaeological trial trenched field evaluation in October 2013, in accordance with a brief issued by the Suffolk County Council Archaeology Service Conservation Team. The evaluation identified no deposits of archaeological interest. We therefore have no objections to the proposed development and do not believe any archaeological mitigation is required.
22. **Suffolk County Council (Strategic Planning) – initial comments** (Jan 2014) - **do not object**, and comments as follows;
 - Forest Heath is currently undertaking a Single Issue Review looking at housing numbers and distribution across the district. In this connection we will greatly welcome the early conclusion of this review to enable a proper plan-led approach to development with the necessary supporting infrastructure provision.
 - As a general point we consider that it would be very helpful and timely to set up a meeting between various stakeholders including the District Council, County Council, Parish Council and local community representatives to consider the implications of housing growth in Lakenheath of which this application is a departure from the Development Plan.
 - In particular careful consideration will need to be given to infrastructure capacity/constraints in terms of ensuring the delivery of sustainable development as articulated in the NPPF.
 - **Education (Primary)**. We need to clearly understand the outcome of the Single Issue Review in terms of housing numbers allocated to Lakenheath for future growth. This is critical in terms of shaping our future primary school strategy for Lakenheath. With further planned housing growth in Lakenheath over the plan period to 2031 the only sensible outcome will be to provide a second new 315 place primary school (free site of 2 hectares and build costs funded by developers).
 - The existing primary school at Lakenheath has recently been expanded to 315 places to take account of the move from 3 to 2 tiers as well as dealing with latent population growth. Whilst the preference would be to expand the existing primary school to provide additional classrooms with facilities the site constraints mean that this is not a realistic or feasible option. With latent population growth and further housing growth

planned at Lakenheath the emerging education strategy is to deliver a new 315 place primary school.

- The cost of providing a new primary school is £17,778 for each school place. It is forecast that this development would generate 14 primary school places. The contribution to be secured from this development is therefore £248,892 (14 places x £17,778 per place).
- With regard to site acquisition costs we can assume £10,000 per acre (£24,710 per hectare) which gives a total cost of £49,420 for a 2 hectare site and equates to £157 per pupil place. This gives a land contribution of 14 places x £157 per place = £2,198.
- In view of the above issues we consider that it is critical to fully consult with the Head teacher, School Governors and the local community before any decisions are made on this application.
- **Education (Secondary).** There are currently forecast to be surplus places available at the catchment secondary schools serving the proposed development, so we will not be seeking secondary school contributions.
- **Education (Pre-school provision).** It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. From these development proposals up to 7 pre-school pupils are anticipated at a cost of £6,091 per place. In Lakenheath census data shows there is an existing shortfall of places in the area. A capital contribution of £42,637 is requested.
- **Play space provision.** Consideration will need to be given to adequate play space provision.
- **Libraries.** A capital contribution of £14,472 to be used towards libraries is requested. The contribution would be available to spend in at the local catchment library in Mildenhall.
- **Waste.** A waste minimisation and recycling strategy needs to be agreed and implemented by planning conditions
- **Supported Housing.** Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. We would also encourage all homes to be built to 'Lifetime Homes' standards.
- **Sustainable Drainage Systems.** Developers are urged to utilise sustainable drainage systems (SuDS) wherever possible, with the aim of reducing flood risk to surrounding areas, improving water quality entering rivers and also providing biodiversity and amenity benefits. Under certain circumstances the County Council may consider adopting SuDS ahead of October 2013 and if this is the case would expect the cost of ongoing maintenance to be part of the Section 106 negotiation.

- **Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. We would strongly recommend the installation of automatic fire sprinklers.
- **High-speed broadband.** SCC would recommend that all development is equipped with high speed broadband (fibre optic).

23. **Suffolk County Council (Strategic Planning)** (received 14th May 2014) submit a **holding objection** and comment as follows:

- I provided a comprehensive response by way of letter dated 23 January 2014 which I am grateful is included in the Development Control Committee report being considered on 14 May 2014. However this letter provides further clarification of the County Council's position
- This letter raises further issues for Forest Heath to consider in terms of important matters relating to primary school provision for Lakenheath and should be reported to the Development Control Committee. The position at Lakenheath in terms of education is different from other settlements across the district in that, at this point in time, whilst there is a clear strategy, i.e. there is an agreed need for a new primary school, no site has been secured yet and temporary classroom provision is difficult due to the site constraints of the existing primary school. Furthermore, the County Council is aware of previous draft development plan documents indicating the level of further growth for Lakenheath.
- The Forest Heath Core Strategy Development Plan Document was adopted in May 2010 and includes Policy CS13 Infrastructure and Developer Contributions. However we are very concerned that, ahead of the conclusion of the Single Issue Review and Site Allocations, which will address housing numbers and distribution across the district, there may well be no plan-led approach which could result in development not having the necessary supporting infrastructure provision.
- In particular it is widely accepted that Lakenheath needs a new primary school to support growth but at this point in time a suitable site for a new primary school has not been identified or secured. A minimum site size of 2 hectares will need to be identified, reserved and secured within Lakenheath to serve the community's needs. However, it would only be reasonable to develop such a school if there were greater certainty of additional houses anticipated in Lakenheath in the plan period. The ideal process would be for the County Council to work closely with the District Council through the Site Allocations process to identify a suitable site for a new primary school provided that the overall housing growth justified that.
- Whilst we are encouraged that this development has agreed to make proportionate contributions towards land and build costs for the new primary school, the real problem that the County Council faces is that without a school site being identified and secured, some of the children arising from this development or in Lakenheath generally may not be able to secure a place at their existing local primary school. In this scenario the County Council may be forced into a position of sending local primary age children by bus or taxi to other schools in the area. The assumed current annual cost for taking one child to and from school is

about £850. As you are aware the existing primary school at Lakenheath has recently been expanded to 315 places to take account of the move from 3 to 2 tiers as well as dealing with latent population growth. Whilst the preference would be to expand the existing primary school to provide additional classrooms with facilities the site constraints mean that this is not a realistic or feasible option.

- In the circumstances, we consider that the Development Control Committee needs to be taking into account the very real sustainability issues that may arise of some local children not being able to secure a place in the short term at the existing primary school if further housing growth at Lakenheath is approved before a new primary school site is secured. The County Council would not object to this proposal if it were to be part of a planned series of developments at Lakenheath (including the allocation of a new school site), provided that adequate funding was secured to provide an appropriate contribution to school buildings and site and the necessary additional travel costs pending construction of a school. However there is no certainty about the scale or location of growth at the moment. Furthermore there is new information that there are a number of other planning applications which have been submitted in Lakenheath in the recent past and there is a need to be able to consider these matters as a whole.
- Accordingly the County Council submits a **holding objection** in respect of this proposal pending further consideration of how the education matters could be resolved in the absence of a site allocations document. The Council is keen to have early discussions with the District Council to examine this matter.

24. **Suffolk County Council (Strategic Planning)** – further representations received 8th August 2014) **removing their holding objection** to the planning application. The following comments were received;

- Continued uncertainty about the scale and location of growth in Lakenheath in the absence of a site allocation document and the relatively recent removal from consideration of the possible site on the Elveden Estates land for 750 dwellings which included a primary school site has presented considerable difficulty for the county council in determining how the appropriate education strategy for Lakenheath can now be delivered i.e. where can an alternative school site be located to best serve the local community. This has been compounded by the recent decision by the US authorities to relinquish housing at Lord's Walk in Eriswell and release these houses back into civilian use, thereby potentially adding greater numbers of school children to the existing upward trends. The existing primary school site in the village is almost at capacity and it is clear that the constrained nature of the site does not allow this to be used as a long term solution for additional accommodation requirements.
- There are two areas of uncertainty – the permanent location of any new school site and meeting short term needs pending the construction and opening of a new school. On the permanent location of a new school, which is likely to be 1.5 forms of entry (315 places) but could be up to 2 forms of entry (420 pupils) and requiring a minimum of 2 hectares of land, the county council has commissioned its consultants, Concertus, to identify options for possible sites. Concertus has so far identified a

number of possibilities, but these have yet to be carefully tested. A number of uncertainties remain:

- The size and configuration of the sites in relation to the school requirements;
 - Whether the sites are likely to be available in the next couple of years;
 - Their relationship to access and services;
 - Environmental, flooding, aircraft noise and other constraints on the site;
 - Their location within the village in relation to the spread of development identified in any site allocation document proposed by the district council and, if it is to accommodate children from Lord's Walk, its distance from that site.
 - Whether the sites offered come as part of a wider planning proposal and what the view of the district council is of the likely acceptability of such a scheme.
 - Furthermore, there is the uncertainty about the willingness of the landowners to release their sites and the question of whether compulsory purchase procedures will be needed.
 - An assessment of highway impacts on the village, both in terms of the new school site location but also from cumulative impacts from village-wide development.
- All of this means that it is not possible at this point for the county council to be clear about which site, if any, might be suitable for development and exactly when it would be deliverable. Furthermore, the pace at which this work has had to be done militates against effective engagement with the local community.
 - In the short term, the capacity of the existing primary school will be exceeded in the next year or so and temporary arrangements will need to be put in place to accommodate additional children. This will be driven in part, if not wholly, by any housing schemes granted permission in the village. It is not clear that a plan can be developed that will allow for temporary accommodation on the existing constrained site, pending completion of the new school. If not, then school children will need to be transported to schools in surrounding villages or towns, which in themselves may well require temporary extensions. Clearly, for an uncertain period of time, this could result in an unsustainable pattern of school provision.
 - It is recognised that the district council faces an issue about identifying adequate housing land. The county council considers that it is a matter for the district council to balance the needs for the release of new housing sites with the risks associated with the emergence of a possibly unsustainable pattern of school provision. In this context, it removes the holding objection previously registered and leaves it to the district council to draw the planning balance considering these and all other relevant matters.

- If the district council considers that it should approve the planning application, this should be on the basis that sufficient funding is made available for a proportionate share of the costs of the school site (possibly at residential value), the school building costs and the costs of the temporary classrooms at an existing primary school and/or the costs of school transport pending the construction of a permanent school. This would be in addition to the costs of other infrastructure as identified in our earlier correspondence.
 - On this basis we would request the following updated contributions in respect of education mitigation from this particular scheme of 67 dwellings, namely:
 1. Based on the methodology set out in the adopted Developers Guide we estimate that a minimum of 14 primary age children will arise from a scheme of 67 dwellings.
 2. The pro-rata contribution towards the full build cost of a new school is £248,892 (2014/15 costs).
 3. The pro-rata contribution towards the acquisition costs of a new 2 hectare site assuming a maximum residential value of £864,850 per hectare (£350,000 per acre) is £76,874. If the site is purchased on the basis of a lower value then the County Council will credit the difference back to the developer.
 4. Temporary classroom costs if required. The cost to purchase a single temporary classroom with toilet and accessible toilet is currently estimated to be £106,000, the cost of which would need to be secured from this development on a pro-rata basis.
 5. The annual transport cost per pupil if required is assumed to be £750 (2014/15 costs).
25. **Suffolk County Council – (Suffolk Fire and Rescue Service) – no objections** to the proposals and advise that access for fire appliances needs to meet with Building Regulations requirements, advocates the use of sprinkler systems within new buildings and recommends imposition of a condition requiring details of provision of fire hydrants for the development to be submitted for approval and thereafter provided.
26. **FHDC – (Strategic Housing) supports** and comments as follows;
- The Strategic Housing team supports this development in Lakenheath subject to an agreed affordable housing mix. There is strong evidence from the Housing Register to conclude there is housing need in Lakenheath. There are currently 200 applicants indicating a preference to live in Lakenheath, of which 169 have a 1 and 2 bed need.
 - We request the following mix (corrected March 2014);
 - 12 x 1 bed (2 person) flats rented
 - 4 x 2 bed (4 person) flats rented
 - 4 x 2 bed (4 person) houses 2 rented and 2 shared ownership.

- We would also encourage working with a Registered Provider of Affordable Housing at an early stage and ensure the affordable homes, meet the Homes and Communities Agency (HCA) design and quality standards.
27. The developer has sought to negotiate the affordable housing mix with the Strategic Housing Team following receipt of these comments and has submitted revised drawings to demonstrate an affordable housing mix closer to that which has been requested by the team. The Strategic Housing Team has been re-consulted and their comments are set out in the next paragraph.
28. **FHDC – (Strategic Housing) supports** the proposals and comments as follows;
- The Strategic Housing team support this development in Lakenheath and the commitment to provide 30% affordable housing in accordance with Policy CS9. This equates to 20 affordable dwellings being provided on site with a 0.1 financial contribution. There is evidence from the Housing Register and the SHMA to conclude that there is a need for a variety of tenure and mix in Lakenheath. The Strategic Housing Team accept the indicative mix of 12 x 1 bed (2 persons) flats, 6 x 2 bed (4 person flats, preference ground floor as agreed) for rented and 2 x 2 bed (4 person) houses for shared ownership only.
 - The affordable housing must meet as a minimum, the Homes & Communities Agency (HCA) design standards and the Strategic Housing Team encourages working with a Registered Provider of affordable housing at an early stage.
29. **FHDC – (Environmental Health)** (initial comments prior to receipt of noise report) **no objections** to the proposals subject to the imposition of conditions to secure a detailed scheme of contamination investigation (including submission of a report and subsequent remediation if necessary) and construction method statement (hours of work (including operation of generators), handling of waste materials arising and dust management).
30. **FHDC – (Environmental Health)** (following receipt of the noise report) **no objections** and comment that the proposed properties on the development will be protected internally from environmental noise and the times of construction are reasonable.
31. **FHDC – (Leisure, Culture and Communities) – no objections** to the proposals and comments as follows;
- Central position of the open space is acceptable.
 - The space should contain natural playable features.
 - Should be surrounded by a knee rail.
 - Detail of soft landscaping and tree planting required.
 - Red line plan confirming all adoptable areas.
 - Confirmation that green spaces adjacent to parking spaces to be conveyed to residential units.
 - Who will have responsibility for the communal amenity space?
 - Any formal play provision should be off site and provided at the existing play area on Briscoe Way.

32. **FHDC – (Ecology, Tree and Landscape Officer) - no objections** and comments as follows;

Landscape

- The proposal does not include a landscape and visual assessment. The site is located on agricultural land with few existing features except the trees located on the eastern boundary. Land to north and west is open, enclosed by the alignment of the Cut Off Channel which is separated from the site by agricultural land. To the south and east is residential development.
- The proposals, in general, include for the retention of the existing trees except a stand of regenerated poplar trees. Some small sections of hedge will need to be removed to allow for access. A tree protection plan has been submitted and this will need to be implemented.
- The development of the site will result in the loss of agricultural land, and the introduction of additional built form which is considered to be an impact on landscape character.
- The DAS includes notes on a landscape strategy for the site. The strategy will need to be developed further if the application is approved
- *[Suggested condition] Detailed soft and hard landscaping to be submitted and implemented*

SUDs

- The provision of sustainable urban drainage is not shown on the layout. The applicant must show that there is no double counting of open space and SUDs and that whilst it is desirable for the SUDs provision to adjoin the open space it does not form part of the open space provision.

Ecology

- Natural England has not objected to the proposals and that there would be no impact on statutory sites including SSSI's (Pashford Pools Fen, Lakenheath (SSSI), Lakenheath Pools Fen SSSI)
- An ecological assessment accompanies the application which has assessed the risk to habitats and species. Precautionary mitigation and environmental enhancements are recommended and their provision/implementation should be secured by condition. The ecological enhancements should be shown on the landscape plan for the site.

Representations:

33. **Lakenheath Parish Council (initial comments) – no objections** but would like it noted the site is outside the settlement boundary. Should

planning permission be granted the Parish Council request conditions covering the following matters should be applied;

- water permeable paving on driveways and hardstanding areas;
- solar panels on all initial construction;
- grey water storage units;
- affordable homes allocated to Lakenheath/local residents;
- It is known and noted that waste water treatment for this area must be updated before the commencement of any construction;
- There is some concern that the "Access & Design Statement" suggests aircraft noise is not an issue. It is known that much of the village suffers from aircraft noise to a greater, or lesser, extent.

34. **Lakenheath Parish Council - additional comments** following their collective consideration of current planning applications for major housing development in the village;

- "...the PC would like independent professional advice/guidance on the way forward paid for by the proposed developers."

35. **Lakenheath Parish Council** – further comments received 14th May 2014 – **object** to the planning application and comment as follows (nb the letter was prepared on behalf of the Parish Council by a law firm):

- The Parish Council resolved at its meeting on 12 May 2014 to commence legal proceedings if the application is approved. They would prefer to meet with you to discuss their concerns but so far, despite Suffolk County Council strongly recommending a meeting of stakeholders prior to approval of the application, this has not happened with the consequence that instructions have been issued to prepare a case for judicial review.
- The Parish Council are concerned with the way the Council has handled the application, which if granted, would form grounds for judicial review (other possible grounds for review are reserved).
- The part of the Core Strategy CS7 not quashed by the High Court proposes substantial housing growth for Lakenheath, some 850 houses in total with the Council now mooted an upwards total of 1200.
- The options for allocation of this housing is yet to be assessed for environmental impacts and social needs as this is planned as part of the Single Issue Review. The reference in the officers report to the Single Issue Review being in its infancy is not credible and misleading on a material issue concerning the legal duty imposed on the Council by Section 38(6) of the Planning and Compulsory Purchase Act to have regard to the development plan.
- We also consider the officer report misrepresents the view of Suffolk County Council in relation to the importance of the Council completing the Single Issue Review before determining this application. What SCC

said is plainly an objection and the fact that the officer then goes on to quote substantial parts of the letter gives a misleading impression to the Committee about the strength of concern the SCC has with this development, before the Single Issue Review has been concluded and stakeholders engaged to address infrastructure needs.

- Plainly the language “we would greatly welcome the early conclusion of this review to enable a proper plan-led approach to development with the necessary supporting infrastructure provision” is intended to mean that this application should not be decided until the review has been completed.
- The further comments from SCC “As a general point we consider that it would be very helpful and timely to set up a meeting between the various stakeholders including the District Council, County Council, Parish Council and local community representatives to consider the implication for housing growth in Lakenheath of which this application is a departure from the development plan” have plainly not been addressed, because no such meeting has taken place.
- In relation to infrastructure of primary education, the officer’s report admits that the Primary School is at capacity. SCC’s letter says it is critical for the Council to fully consult the Head Teacher, School Governors and local community, before any decisions are made on the application. The fact that the officer records these remarks in the Committee Report, but fails to then explain why the Council has not acted on this critical recommendation, is a manifest failure to deal with the statutory consultee comments which would constitute material considerations under S70(2) of the Town and Country Planning Act.
- The pragmatic effect of permitting a developer-led piecemeal development prior to conclusion of the Single Issue Review will undermine the holistic approach to the longer planning needs of the village. In particular we understand that Elveden Estates are proposing a circa 900 development on the estate land plus the necessary primary school infrastructure. The Parish Council consider this application along with the other piece-meal applications pending before the Council (one of which we understand is on land owned by the Council leader) will jeopardise that development proposal’s viability and could put at risk delivery of the necessary infrastructure including a new primary school.
- The Parish Council consider the comments lodged by Bennetts planning advisors, Gerald Eve, are highly indicative of a developer manipulation of the District Council’s strategic planning powers at the expense of the community, in the context where the Single Issue Review which is underway and not in its infancy.
- You will no doubt appreciate that the Local Plan process is precisely the strategic mechanism for competing land allocations to be assessed against agreed strategic criteria. They consider that determination of this application before the Single Issue Review is complete is an attempt to circumvent the domestic and EU-law protections of assessing competing land options through the Sustainability Appraisal and Strategic Environmental Assessments that a plan-led approach provide.

- Five-hundred dwellings are now coming on to the open market in the neighbouring area of Eriswell adjacent to RAF Lakenheath. This is referred to in the officer report as an objectors comment but the report does not include this large development in the assessment of the housing supply issue. Plainly this distorts the present housing supply assessment given the statutory duty to cooperate imposed on Councils by the Localism Act, as an amendment to the Planning and Compulsory Purchase Act 2004.
- We are surprised that the apparent EIA screening of the application done by the Council reached the view that the application is not EIA development. In our experience a development of the scale which is five times the 0.5 hectare threshold and causes substantial loss of greenfield land is likely to give rise to significant environmental effects and should have been treated as EIA development. This is of particular concern given the socio-economic impacts on the infrastructure referred to by SCC. Plainly the extant applications at Elveden plus the proposed development at Rabbit Hill Covert give rise to significant effects which should have been considered in any EIA screening.
- To conclude, the main concern is the lack of overall strategic planning for this sensitive rural area with identified serious infrastructure deficiencies needed to accommodate housing growth proposed by Core Strategy Policy CS7. The key element is the need for co-ordinated village infrastructure i.e. schools, health, elderly persons provision, and transport infrastructure as well as all the vital infrastructure that would be absolutely necessary to permit a viable sustainable development for the community of Lakenheath.

36. **Ten letters/e-mails** have been received from local residents **objecting** to the planning application. This issues and objections raised against the proposals are summarised as follows;

- Lakenheath is not suitable for large housing developments given there are no jobs, public transport is poor, sewerage infrastructure cannot cope and there are very few amenities (school, doctors' and dentists' already over capacity); this development offers nothing to the village.
- The Council should reject or defer decisions until a more holistic policy is formulated following public consultation (prematurity).
- The local community plan for Lakenheath should be allowed to be completed and fed into the district council's consultation process, before any major decisions are made.
- The proposal is a departure from the Development Plan as it is outside the settlement boundary.
- The amount of development currently proposed in the village is disproportionate for the village and places an unsustainable impact on the wider infrastructure (water, energy, health and education).
- The true availability of existing housing needs to be assessed (including number of rentals to USAF personnel and families).
- Traffic congestion will be made worse.

- Some of the dwellings are too close to existing dwellings.
 - Site may not be suitable owing to flood risk.
 - Access is not suitable for construction vehicles.
 - Noise, pollution, mess and street parking problems will be caused during construction.
 - Inadequate parking in the High Street which is impassable at times. This will get worse when Tesco is built. Development to the north of the village would increase traffic through the High Street. Emergency response vehicles would be affected.
 - Impact of development upon infrastructure should be independently assessed.
 - The site office should be located away from dwellings.
 - Local residents will be disrupted by roadwork (pipe & cable connections)
 - Developer needs to give assurances they will be a 'good neighbour', including that construction vehicles will be parked on-site and not on the existing estate roads.
 - Five-hundred dwellings at Lords Walk are about to be released for general occupation, these should be counted against the target for Lakenheath.
 - Development would be preferable at the opposite end of the village.
 - Brownfield sites in the village should be developed before greenfield sites are released for development.
 - Dwellings should be more energy efficient (solar panels etc.).
37. **One letter** has been received from a local resident confirming they **do not object** to the proposals but wish the following issues to be considered;
- Loss of [*private*] views.
 - Overlooking of existing dwelling (garden).

**Policies:
Development Plan**

38. The Development Plan is comprised of the adopted policies of the Core Strategy Development Plan Document (adopted May 2010) and the saved policies of the Forest Heath Local Plan (adopted 1995) which have not been replaced by Core Strategy policies. The following Development Plan policies are applicable to the proposal:

Core Strategy

39. The Core Strategy was the subject of a successful legal challenge following adoption. Various parts of the plan were affected by the High Court decision, with Policies CS1, CS7 and CS13 being partially quashed (sections deleted) and section 3.6 deleted in its entirety. Reference is made to the following Core Strategy policies, in their rationalised form.

Visions

- Vision 1 – Forest Heath
- Vision 5 – Lakenheath

Spatial Objectives

- Spatial Objective H1 – Housing provision.
- Spatial Objective H2 – Housing mix and design standard.
- Spatial Objective H3 – Suitable housing and facilities (life time homes).
- Spatial Objective C1 – Retention and enhancement of key community facilities.
- Spatial Objective C2 – Provision and maintenance of open space, play & sports facilities and access to the countryside.
- Spatial Objective C4 – Historic built environment.
- Spatial Objective ENV1 – Habitats and landscapes and improving biodiversity.
- Spatial Objective ENV2 – Climate change and reduction of carbon emissions.
- Spatial Objective ENV3 – Promotion of renewable energy and energy efficiency.
- Spatial Objective ENV4 – Design and architectural quality respecting local distinctiveness.
- Spatial Objective ENV5 – Designing out crime and anti-social behaviour.
- Spatial Objective ENV6 – Reduction of waste to landfill.
- Spatial Objective ENV7 – Achieve sustainable communities by ensuring services and infrastructure are commensurate with new development.
- Spatial Objective T1 – Location of new development where there are opportunities for sustainable travel.

Policies

- Policy CS1 – Spatial Strategy.
- Policy CS2 – Natural Environment.
- Policy CS3 – Landscape Character and the Historic Environment.
- Policy CS4 – Reduce Emissions, Mitigate and Adapt to future Climate Change.
- Policy CS5 – Design Quality and Local Distinctiveness.
- Policy CS6 – Sustainable Economic Development and Tourism
- Policy CS7 – Overall Housing Provision (Sub-paragraph 1 only. Sub paragraphs 2, 3, 4 and 5 were quashed by the Court Order).
- Policy CS9 – Affordable Housing Provision.
- Policy CS10 – Sustainable Rural Communities.
- Policy CS13 – Infrastructure and Developer Contributions.

Local Plan

40. A list of extant saved policies from the Forest Heath Local Plan (1995) is set out at Appendix A of the adopted Core Strategy (2010). The following saved policies are relevant to these proposals:

- Policy 4.15 – Windfall Sites – Villages.
 - Policy 9.2 – The Rural Area and New Development.
 - Policy 10.2 – Outdoor Playing Space (new provision).
 - Policy 10.3 – Outdoor Playing Space (as part of new development proposals).
 - Policy 14.1 – Securing Infrastructure and Community Facilities from Major New Developments.
- Inset Map 12 (Lakenheath Development Boundary)

Other Planning Policy

Supplementary Planning Documents

41. The following Supplementary Planning Documents are relevant to this planning application:
- Joint Affordable Housing Supplementary Planning Document (September 2013)
 - Open Space, Sport and Recreation Supplementary Planning Document (August 2011)
 - Suffolk Advisory Parking Standards (2002)

Emerging Development Plan Policy

42. The Council is currently finalising the details of two Development Plan Documents (Single Issue Review of the Core Strategy and Site Allocations Document) and both will soon be placed on public consultation before submission for examination and, ultimately, adoption.
43. Forest Heath District and St Edmundsbury Borough Council's have prepared a 'Joint Development Management Policies Document' (currently with 'submission' status, October 2012). The Document was submitted to the Planning Inspectorate in December 2013 following public consultation and has been the subject of examination (July 22-25 2014). The outcome of the examination is presently awaited.
44. With regard to emerging plans, The National Planning Policy Framework (the Framework) advises (at Annex 1) from the day of publication, decision-takers may give weight to relevant policies emerging plans (unless material indications indicate otherwise) according to:
- The stage of preparation of the emerging plan (the more advanced the preparation, the greater weight that may be given)

- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater weight that may be given); and
 - The degree of consistency of the relevant policies in the emerging plan to the policies in the Framework, the greater weight that may be given.
45. The emerging Single Issue Review and Site Allocations documents have not been published for public consultation so can be attributed on very little weight in this decision given the significant uncertainties that surround the final content of these documents. Members should note that, for the purposes of public consultation for the Site Allocations Document, the application site is actually a 'preferred site' (i.e. not excluded at this stage). However, this initial draft 'allocation' should not be attributed significant weight given current uncertainties as to whether the site will actually be included in any later draft of the Plan that is submitted to the Planning Inspectorate for examination. The Development Management Policies document has been published, has been the subject of public consultation and formally submitted for examination. Accordingly some weight can be attributed to this plan in the decision making process.
46. Objections have been received to the vast majority of the policies set out in the policies document which, according to the guidance, reduces the weight which can be attributed to them. The policies have been reviewed but none are considered determinative to the outcome of this planning application so reference is not included in the officer assessment below.
47. The following emerging policies from the document are relevant to the planning application;
- DM1 – Presumption in Favour of Sustainable Development
 - DM2 - Creating Places – Development Principles and Local Distinctiveness
 - DM3 – Masterplans
 - DM4 – Development Briefs
 - DM5 – Development in the Countryside
 - DM6 – Flooding and Sustainable Drainage
 - DM7 – Sustainable Design and Construction
 - DM8 – Improving Energy Efficiency and Reducing Carbon Dioxide Emissions
 - DM11 – Impact of Development on Sites of Biodiversity and Geodiversity Interest
 - DM12 – Protected Species
 - DM13 – Mitigation, Enhancement, Management and Monitoring of Biodiversity
 - DM14 – Landscape Features
 - DM15 – Safeguarding from Hazards
 - DM18 – Conservation Areas
 - DM21 – Archaeology
 - DM23 – Residential Design
 - DM28 – Housing in the Countryside
 - DM41 – Community Facilities and Services
 - DM42 – Open Space, Sport and Recreation Facilities
 - DM45 – Transport Assessment and Travel Plans
 - DM46 – Parking Standards

National Policy and Guidance

48. The National Planning Policy Framework (the Framework) sets out government's planning policies for England and how these are expected to be applied.

49. Paragraph 14 of the Framework identifies the principle objective:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole;
 - or specific policies in this framework indicate development should be restricted."

50. This presumption in favour of sustainable development is further reinforced by advice relating to decision-taking. Paragraph 186 of the Framework requires Local Planning Authorities to "approach decision taking in a positive way to foster the delivery of sustainable development". Paragraph 187 states that Local Planning Authorities "should look for solutions rather than problems, and decision takers at every level should seek to approve applications for sustainable development where possible".

51. The relevant policies of the Framework are discussed below in the officer comment section of this report.

52. The Government has recently (March 2014) released its National Planning Practice Guidance (NPPG) following a comprehensive exercise to review and consolidate all existing planning guidance into one accessible, web-based resource. The guidance assists with interpretation about various planning issues and advises on best practice and planning process. Relevant parts of the NPPG are discussed below in the officer comment section of this report.

Officer Comment:

53. This section of the report begins with a summary of the main legal requirements before entering into discussion about whether the development proposed by this planning application can be considered acceptable in principle in the light of extant national and local planning policies. It then goes on to analyse other relevant material planning considerations (including site specific considerations and cumulative impacts) before concluding by balancing the proposals benefits against its dis-benefits.

Legal Context

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011

54. Given the scale of development proposed, the planning application has been screened under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The Council's formal Screening Opinion concluded that the proposal is not 'EIA development' and an Environmental Statement was not required to accompany the planning application.

The Conservation of Habitats and Species Regulations 2010

55. Given the location of the various designated nature sites in the vicinity (including the Breckland Special Protection Area) consideration has been given to the application of these Regulations. If a plan or project is considered likely to give rise to significant effects upon a European site, Regulation 61 requires the decision maker to make an appropriate assessment of the implications for that site before consenting the plan or project.
56. The application site is in the vicinity of designated (European) sites of nature conservation but is not within a designation or land forming a formal buffer to a designation. The Council's Environmental Impact Assessment Screening Opinion concluded that the proposals are unlikely to give rise to significant effects on the conservation objectives of the designated sites. Furthermore, the nature groups, including Natural England (the statutory advisor under the Habitats and Species Regulations) have not raised concerns or objections in response to the planning application. Officers have concluded that the requirements of Regulation 61 are not relevant to this proposal and appropriate assessment of the project will not be required in the event that the Committee resolves to grant planning permission.

Natural Environment and Rural Communities Act 2006

57. The Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. The potential impact of the application proposals upon biodiversity interests is discussed later in this report.

Planning and Compulsory Purchase Act 2004 (as amended)

58. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The Forest Heath Development Plan is comprised of the saved policies of the Local Plan and the adopted Core Strategy (as amended by the judgement handed down by the High Court). National planning policies set out in the Framework are a key material consideration.

Planning (Listed Buildings and Conservation Areas) Act 1990

59. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states;

In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority (LPA)... 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.

60. Section 72(1) of the same Act states;

...with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

61. In this case there are no listed buildings at the site or close to the site (such that their settings would be affected). Similarly the development is not situated in a Conservation Area and the built form would not affect views into or out of the nearby Lakenheath Conservation Area. There is likely to be an increase in traffic using the main road through the Conservation Area following occupation of the proposed dwellings, but this is not considered to lead to significant impacts arising on the character or appearance of the Lakenheath Conservation Area.

Crime and Disorder Act 1998

62. Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998 (impact of Council functions upon crime and disorder), in the assessment of this application but the proposal does not raise any significant issues.

Principle of Development

National Policy context and Forest Heath's 5-year housing supply.

63. Paragraph 47 to the Framework states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (as far as is consistent with policy), including identifying key sites which are critical to the delivery of the housing strategy over the plan period.
64. In addition, the Framework requires authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five-years worth of housing against their housing requirements with an additional buffer of 5% (or a 20% buffer if there is evidence of a persistent under-delivery of new housing) to ensure choice and competition in the market for land.
65. Crucially for this planning application the following policy is set out at paragraph 49 of the Framework;

"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the Local Planning Authority cannot demonstrate a five-year supply of deliverable housing sites".

66. The surviving extant elements of Core Strategy policy CS7 requires the provision of 6,400 new dwellings in the period 2001 – 2021 and a further 3,700 homes in the period 2021 – 2031. As at March 2012 a total of 3,089 dwellings have been completed since 2001. In order to meet the 6,400 requirement 3,311 dwellings would need to be built to March 2021. This equates to around 367 dwellings annually or 1839 over the five-year period 2012-2017.
67. Some commentators have referred to the release of circa 550 former USAFE personnel dwellings at Lords Walk (in the Parish of Eriswell) onto the housing market as either contributing to the five year housing supply or evidence that further new housing is not required at Lakenheath. Officers are in the process of verifying whether this stock of dwellings is already counted as 'existing' housing stock or whether it could be counted as a contribution towards the five year supply of housing in the District as it is released to the open market. Members will be updated of the outcome at the meeting.
68. It is acknowledged that the Council is currently not able to demonstrate a 5-year supply of deliverable housing sites (the supply was recorded at 3.6 years at March 2012 (or 3.4 years with the 5% buffer required by the Framework) and there is little evidence of a significant recovery over the period since. Indeed the National Planning Practice Guidance confirms that any shortfall in the supply of housing should be made up as soon as possible (i.e. within the 5 year period). This means the adjusted (true) 5-year housing supply in Forest Heath (as at March 2012) drops to approximately 3.15 years.
69. In the light of the Council not being able to demonstrate a 5-year supply of housing any extant Development Plan policies which affect the supply of housing must be regarded by the decision maker as out of date. This includes the 'settlement boundaries' illustrated on the Inset maps attached to the Local Plan (Inset Map 5 for Lakenheath) and Development Plan policies which seek to restrict (prevent) housing developments in principle. Such policies are rendered out of date and therefore carry reduced weight in the decision making process.
70. In circumstances where a Council is not able to demonstrate a 5-year supply of deliverable housing sites, planning applications for new housing development essentially fall to be considered against the provisions of the Framework and any Development Plan policies which do not relate to the supply of housing. The Framework places a strong presumption in favour of sustainable development and where Development Plans are silent or out of date confirms that planning permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or specific policies in the Framework indicate development should be restricted.
71. Since the Framework was introduced there have been numerous examples nationally (including some in the Forest Heath District) where planning permission has been granted at appeal for new housing developments contrary to the Development Plan because the need for housing to be delivered was considered to outweigh identified negative effects.

72. The absence of a five year supply of land lends significant weight in support of granting planning permission for these development proposals, not least given the Government's aim to boost the supply of housing and to stimulate the economy. However, whilst the various appeal decisions provide useful guidance, the fundamental planning principle that each case is to be considered on its own merits prevails.
73. The Framework (advice set out at paragraph 14 of the document in particular) does not equate to a blanket approval for residential development in locations that would otherwise conflict with Local Plan policies. If the adverse impacts of the proposal (such as harm to the intrinsic character and beauty of the countryside) significantly and demonstrably outweigh the benefits, then planning permission should still be refused, even in areas without a 5-year supply of housing (as occurred at the recent Kentford appeal case where a proposal for 102 dwellings was dismissed by the Inspector (reference F/2012/0766/OUT and APP/H3510/A/13/2197077)).

What is sustainable development?

74. The policies in paragraphs 18 to 219 of the Framework, taken as a whole, constitute the Government's view of what sustainable development means in practice for the planning system. It goes on to explain there are three dimensions to sustainable development:
- i) economic (contributing to building a strong, responsive and competitive economy),
 - ii) social (supporting strong, vibrant and healthy communities) and,
 - iii) environmental (contributing to protecting and enhancing our natural, built and historic environment;)
75. The Framework explains (paragraph 9) that in order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. It is Government policy that the planning system should play an active role in guiding development to sustainable solutions.
76. Paragraph 9 of the Framework further explains that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):
- making it easier for jobs to be created in cities, towns and villages;
 - moving from a net loss of bio-diversity to achieving net gains for nature;
 - replacing poor design with better design;
 - improving the conditions in which people live, work, travel and take leisure; and
 - widening the choice of high quality homes.

Prematurity

77. The Council is shortly to consult on a 'Single Issue Review' of the Core Strategy (housing distribution) prior to submission for Examination. At the same time it will begin the formal process of preparing a Site Allocations Development Plan document both of which will subsequently form part of the Development Plan. Concerns have been raised locally that approval of

this planning application would be premature and its consideration should await the formation (adoption) by the Council of an appropriate Local Policy Framework.

78. The NPPF does not address 'prematurity' directly, but advice about the approach the decision maker should take is set out in the National Planning Practice Guide. It states:

Annex 1 of the National Planning Policy Framework explains how weight may be given to policies in emerging plans. However in the context of the Framework and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

(a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or Neighbourhood Planning; and

(b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

Refusal of planning permission on grounds of prematurity will seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.

79. In this case the development proposal for 67 dwellings is not particularly substantial in comparison to the overall quantum of development to be provided over the Plan period. Furthermore, the emerging Single Issue Review of the Core Strategy is in its infancy and carries limited, if any, weight in the decision making process (given that it has not yet been published for consultation).
80. It would be difficult to justify any decision that approval of this scheme would be premature in the context of current guidance. This advice is further re-enforced by the fact that the Council has a significant shortage in its five year land supply, is already 13 years into the Plan period (2001 – 2031) and the proposed development would contribute towards the overall number of dwellings required by Core Strategy Policy CS7.
81. On the basis of national guidance on the issue of prematurity and relevant national policies providing for the delivery of sustainable development without delay, officers do not consider it would be reasonable to object to the planning application on the grounds of it being premature to the Development Plan.

Development Plan policy context

82. Vision 1 of the Core Strategy confirms development will be focussed in the towns and key service centres. Vision 5 (and policy CS1) confirms Lakenheath as a key service centre. Spatial Objective H1 seeks to provide sufficient homes in the most sustainable locations to meet the needs of communities. Policy CS10 confirms the Towns and Key Service Centres will be the focus of new development (providing service to surrounding rural areas). Saved Local Plan Policy 4.15 states new housing development will be in the defined development boundaries and, at (inter alia) Lakenheath, new estate development may be appropriate on allocated sites.
83. The surviving elements of Core Strategy policy CS7 provides for 11,100 dwellings and associated infrastructure in the plan period (2001 – 2031) and confirms development will be phased to ensure appropriate infrastructure is provided. Policy CS13 confirms the release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements from development.
84. Policy CS1 states (in Lakenheath) commercial uses such as shops or offices will be expected to be allocated within any major residential development near the High Street and that sites for 70 new dwellings will be allocated within the existing development boundary. A further part of the policy which confirmed greenfield urban extension sites would be allocated for at least 600 dwellings was quashed by the High Court decision and carries no weight in determining this planning application.
85. Core Strategy policy CS6 states that economic and tourism growth at Lakenheath will be in broad alignment with the scale of housing development to discourage commuting and achieve a homes / jobs balance.

Officer comment on the principle of development

86. The absence of a 5-year housing supply in the District means that Development Plan policies which seek to restrict the supply of housing (i.e. those discussed at paragraphs 82-85 above) are deemed out-of-date by the Framework and thus currently carry reduced weight in the decision making process. This means the planning application proposals must, as a starting point, be considered acceptable 'in principle'.
87. A key determining factor will be whether the proposed development can be deemed 'sustainable' in the context of the policies contained in the Framework (as a whole) and even if it is concluded the proposals would not be 'unsustainable' following analysis, further consideration must be given to whether the benefits of development are considered to outweigh its dis-benefits, as required by the Framework.
88. A balancing analysis is carried out towards the end of this section of the report as part of concluding comments. An officer discussion to assist with Members consideration of whether the development proposed by this planning application is 'sustainable' development is set out below on an issue by issue basis.

Impact upon the countryside

89. The Framework confirms the planning system should (inter alia) protect and enhance 'valued landscapes' and promotes development of previously used land but other than continuing protection of formal Greenbelt designations (of which there are none in Forest Heath) and recognising the hierarchy of graded agricultural land, national policy stops short of seeking to protect the 'countryside' from new development in a general sense.
90. Vision 5 of the Core Strategy recognises the fen and heathland qualities of the countryside surrounding Lakenheath and seeks to protect and enhance these landscapes. Some elements of the countryside surrounding Lakenheath could therefore be viewed as being 'valued landscapes' as cited in the Framework, albeit these are not protected by a local 'Special Landscape Area' designation which weakens that potential significantly.
91. Core Strategy Policies CS2 and CS3 seek to protect, conserve and (where possible) enhance the quality, character and local distinctiveness of the landscape and refers to the Forest Heath Landscape Character Assessment to inform detailed assessment of individual proposals.
92. Lakenheath sits on the lower slopes of the chalky and sandy Maids Cross Hill on the edge of the fens.
93. The application site is agricultural land outside the Lakenheath settlement boundary and is situated in the countryside for the purposes of applying planning policies, including those set out in the Framework.
94. The proposed development for residential development in the countryside is this contrary to extant Development Plan policies which seek to direct such development to locations within defined settlement boundaries or allocated sites. As stated above, those policies which restrict the supply of housing are deemed to be out-of-date by the NPPF given the absence of a five year supply of housing sites in the District.
95. The application site is categorised as 'Settled Chalkland' by the Suffolk Landscape Character Assessment (SLCA). The Assessment recognises the presence of the two air bases are important drivers for economic activity and settlement expansion and states the Settled Chalkland landscapes are under pressure from expansion of settlements and other developments. The document considers it important to minimise the impact of development upon the countryside of the settled chalklands and landscape of the Settled Fenlands.
96. The SLCA comments, in a general sense, that the characteristic pattern of planting found in chalkland landscapes, means it is possible to design effective and locally appropriate boundary planting that will minimise the impact of settlement expansion on the surrounding landscape.
97. The development would be harmful to the character of the countryside as a matter of principle given that it would ultimately change currently undeveloped agricultural land into a developed housing estate and this would be a dis-benefit of the proposals.
98. The impact of the development proposals upon the landscape qualities and character of the wider countryside would not be significant given the

contained character of the site, the presence and screening influence of existing mature landscaping to the north and west and the site abutting the village. The site benefits from existing built development which has a shielding affect along the south and east boundaries and which would form a backdrop to new development at the site. Furthermore, boundary planting is proposed to the outer (north and west) boundaries of the site which will mature to soften the impact of the proposed development upon the local landscape.

99. The impact of the proposed development upon the landscape is considered acceptable with any significant adverse effects capable of mitigation via the introduction of new boundary landscaping (the precise details of which could be secured by means of condition).

Sustainable transportation (accessibility) and impact upon the local highway network (highway safety).

100. The Framework confirms that the transport system needs to be balanced in favour of sustainable transport modes giving people a real choice about how they travel. There is, however, recognition that opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
101. It is Government policy that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable modes of transport can be maximised. However, the Framework confirms this policy needs to take account of other policies in the document, particularly in rural areas.
102. The Framework confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. It goes on to state that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised recognising that this needs to take account of policies set out elsewhere in the Framework, particularly in rural areas.
103. Core Strategy Spatial Policy T1 aims to ensure that new development is located where there are the best opportunities for sustainable travel and the least dependency on car travel. This is reflected in Policies CS12 and CS13 which confirms the District Council will work with the partners (including developers) to secure necessary transport infrastructure and sustainable transport measures and ensure that access and safety concerns are resolved in all developments.
104. The Core Strategy categorises Lakenheath as a Key Service Centre and is thus regarded as a 'sustainable' location which could support growth. Local employment opportunities are restricted with the air base being a key provider of local employment. People living in Lakenheath, not employed at the base, are likely to need to travel to their place of work. There is a range of community facilities in the village, including a number of shops, services, a school, churches and other meeting rooms which serve to contain a number of trips within the village. The village does not have a large grocery supermarket (there is a small Co-Operative in the High Street), although planning permission is extant for a new grocery shop off the High Street, close to the village centre.

105. It is likely that potential occupiers of the dwellings proposed in this planning application would need to travel to meet their employment, retail and entertainment needs. Some of these journeys could be lengthy (non-airbase employees in particular). However, there are a range of services and facilities in the village that will prevent the need for travel to some facilities. Given the village scale of Lakenheath and its isolated situation in a rural area, the development proposals are considered to accord with relevant accessibility policies in the Framework and are sustainable in transport terms.
106. The application site takes vehicular access from Briscoe Way at a single point. Secondary access for pedestrian and cycle access and occasional emergency vehicles is provided from the site onto Burrow Drive. Briscoe Way takes access from Station Road (B1112), the principal route through the village.
107. The applicants have amended the design and layout of the proposals to incorporate comments received from the County Highway Authority whom, consequently, has not objected to the proposals (subject to the imposition of conditions).
108. Access to the proposed development is considered safe and suitable and the development would not lead to significant highway safety issues or hazards. Furthermore, the proposed development would not lead to congestion of the highway network, including during am and pm peak hours.

Impact upon natural heritage

109. The Framework confirms the planning system should contribute to and enhance the natural environment by (inter alia) minimising impacts on biodiversity and providing net gains where possible. The Framework states that protection of designated sites should be commensurate with the status of the site, recognising the hierarchy of international, national and local designations. The presumption in favour of sustainable development set out at paragraph 14 of the Framework does not apply where development requires appropriate assessment under the Birds or Habitats Directives.
110. Spatial Objective ENV1 of the Core Strategy aims to conserve and enhance the habitats and landscapes of international, national and local importance and improve the rich biodiversity of the District. This objective forms the basis of Core Strategy policy CS2 which sets out in greater detail how this objective will be implemented. Saved Local Plan policy 4.15 sets out criteria against which proposals for new housing development are considered. One of the criteria requires that such proposals are not detrimental to significant nature conservation interests.
111. A 'Phase I' Habitat Survey has been submitted with the planning application. This assesses whether the development proposals might affect the internationally designated sites and other important sites/species outside which are protect by the Habitats and Species Regulations and/or the Wildlife & Countryside Act and Local Biodiversity Action Plan (BAP).
112. As discussed above, it is concluded that the development proposals would not impact upon any European designated nature conservation sites. The applicants report supports this conclusion. The presumption in favour of

sustainable development set out at paragraph 14 of the Framework is therefore material to this planning application.

113. The applicant's report confirms the application site (and some adjacent sites) has been surveyed for a range of rare species. It comments the site is predominantly of low ecological value being mainly cultivated arable land (although the rough grass-dominated margins and boundary hedges will be of higher value to wildlife) and recommends that no further survey is necessary (unless hedgerow/shrub clearance is to occur in the bird nesting season).
114. The report concludes that with a sensitive landscaping scheme and by incorporating other measures recommended (provision of three bat boxes, two house-sparrow terraces, provision of reptile hibernacula, planting of climbing plants and provision of a wildlife corridor (suitable hedgerow) to north boundary) the site could be enhanced for local wildlife post-development.
115. Natural England (statutory advisor under the Habitats and Species Regulations) has not raised concerns or objections in response to the proposals, including their potential impact upon the hierarchy of designated nature conservation sites and recognises the potential to secure biodiversity enhancements in the event that planning permission is granted. Natural England has been asked to comment on any potential impacts upon the designated Special Protection Area from recreational pressure from this development in isolation and in-combination with other planned development. The RSPB and Suffolk Wildlife Trust have also been consulted for their views and their advice is also awaited. The Committee will be verbally updated at the meeting of any further advice received from these bodies. Officers do not anticipate any significant issue in this respect given the matter was not raised by Natural England in its initial comments. However, the recommendation has been drafted on a precautionary basis such that if matters are raised requiring further assessment, the planning application would be returned to the Committee for further consideration.
116. Subject to the satisfactory resolution of the above matters, Officers are satisfied that the development proposals would not adversely affect important sites of ecological interest in the area and would not harm populations or habitats of species which are of acknowledged importance (protected or unprotected). There is no evidence to dispute the applicant's conclusions that carefully a constructed development is likely to result in net ecological gains. The delivery of the enhancement measures set out in the Phase I Habitat Survey could be secured by means of an appropriately worded planning condition.

Impact upon built heritage

117. The Framework recognises that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance. When considering the impact of proposed development upon the significance of a designated heritage asset, great weight should be given to the asset's conservation. The term 'heritage asset' used in the Framework includes designated assets such as Listed buildings, Scheduled Ancient Monuments, Registered Parks and Gardens and Conservation Areas and also various undesignated assets including archaeological sites and unlisted buildings which are of local historic interest.

118. The Framework advises that LPA's should require an applicant to describe the significance of any heritage assets affected, the level of detail being proportionate to the importance of the asset and sufficient to understand the potential impact upon their significance.
119. Core Strategy Spatial Objective C4 aims to protect and enhance the Historic Environment. This objective is implemented via Policy CS3.
120. The development proposals would not impact upon any listed buildings, (including their settings) and as discussed above would have only a negligible impact upon the character and appearance of the Lakenheath Conservation Area from increased traffic movement on the main road through the designation.
121. An Archaeological Evaluation Report has been prepared on behalf of the applicants to establish whether the site might support any important archaeological remains (undesigned heritage assets). This has been submitted with the planning application. The report explains the work that carried out to investigate the archaeological potential of the site and confirms that no significant archaeological features or deposits were encountered.
122. The Archaeological Service at Suffolk County Council has been consulted of the planning application and accepts the findings of the applicant's report. Accordingly, no further archaeological work will be needed prior to development commencing and no archaeological mitigation is required.
123. The development proposals would have no significant impacts upon heritage assets.

Impact upon local infrastructure (utilities)

124. The 'economic' dimension of the definition of sustainable development set out in the Framework confirms the planning system should (inter alia) identify and co-ordinate development requirements, including infrastructure. Furthermore, one of the core planning principles set out in the document states that planning should "proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs."
125. These requirements are, however, tempered somewhat later in the document in circumstances where viability is threatening delivery of a development scheme. It confirms the costs associated with policy burdens and obligations (including infrastructure contributions) likely to be applied to development proposals should (when taking account of the normal cost of development and mitigation), provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.
126. Core Strategy Policy CS13 sets out infrastructure requirements and developer contributions. The policy opens with the following statement:

"The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development".

127. The policy lists the main areas as health and social care facilities, educational requirements, strategic transport improvements, waste water treatment capacity, energy supply (electricity), access and safety, open space, sport and recreation. The policy confirms arrangements for the provision or improvement of infrastructure will be secured by planning obligation or (where appropriate) conditions attached to planning permission to ensure infrastructure is provided at the appropriate time.
128. The policy concludes that all development will be accompanied by appropriate infrastructure to meet site specific requirements and create sustainable communities.
129. Matters pertaining to highway, education, health and open space (including sport and recreation) infrastructure are addressed later in this report. This particular section assesses the impact of the proposals upon utilities infrastructure (waste water treatment, water supply and energy supply).

Infrastructure and Environmental Capacity Appraisal

130. The provision of services and facilities within the District's settlements has been the subject of investigation and assessment through the 2009 Infrastructure and Environmental Capacity Appraisal (IECA), which has informed preparation of the Development. The IECA report (commissioned jointly with St Edmundsbury Borough Council) considers the environmental capacity of settlements in the District, and recognises the need for a mechanism to provide social, physical and environmental infrastructure to support growth. The report also considers settlement infrastructure tipping points, which are utilised to evaluate potential impacts on infrastructure.
131. The IECA report is the most up to date evidence base of the infrastructure capacity in the District and was a key document of the recent appeal for new housing development at Kentford (referenced at paragraph 73 above).

Waste water treatment infrastructure

132. Details submitted with the planning application confirms the proposed development would connect to existing foul water systems in the village. The village is served by Lakenheath Wastewater Treatment Works. IECA comments that the Water Cycle Study identifies that the location of the Treatment Works makes north and west sites preferable otherwise upgrades to the network may be required, although the Treatment Works has severely constrained headroom.
133. The IECA report refers to the Strategic Flood Risk Assessment and Water Cycle Study which identifies that up to 169 new dwellings could be provided in the village within the headroom of the Treatment Works. It does, however, identify that there are only minor constraints to upgrading the works which will need to be completed before significant new development.
134. There has not been significant development undertaken at Lakenheath since the publication of the evidence base contained in the IECA report. Accordingly, the available evidence concludes that this development (being

located to the north of the village and within the headroom of the Treatment Works) is acceptable with regard to waste water infrastructure. Indeed this conclusion has been corroborated by Anglian Water the statutory sewerage undertaker which has not objected to the application and has not requested the imposition of any conditions relating to the treatment of waste water arising from the development.

Water supply

135. IECA comments that the Water Cycle Study identifies that Lakenheath has a large diameter main running along the eastern edge which should allow development, although development away from the eastern edge may require upgraded mains. It concludes that the potable water supply network should not be a major constraint to development around Lakenheath (no tipping points are identified).

Energy supply

136. The village is served by Lakenheath major substation. The IECA report states that EDF Energy has identified that the substation is operating comfortably within capacity and should not constrain growth. The report estimates that some 2,500+ new dwellings could be served from the substation which is way in excess of this proposed development.

Flood risk, drainage and pollution

137. Policies for flood risk set out in the Framework aim to steer new development to areas with the lowest probability of flooding. The Framework policies also seek to ensure that new development does not increase the risk of flooding elsewhere.
138. The Framework states that to prevent unacceptable risks from pollution and land instability, planning decisions should ensure that new development is appropriate for its location. It also confirms that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.
139. Core Strategy Policy CS4 states the Council will support development proposals that avoid areas of current and future flood risk and which do not increase the risk of flooding elsewhere. The policy confirms sites for new development will be allocated in locations with the lowest risk of flooding (Environment Agency Zone 1 flood category) and will seek the implementation of Sustainable Urban Drainage Systems (SUDS) into all new development proposals, where technically feasible.
140. The application site is not in an area at a risk of flooding (i.e. Environment Agency flood risk Zones 2 or 3) and it is therefore unlikely that the proposed dwellings would be at risk of flooding from the nearby drainage channel (north and west of the site), being outside its modelled floodplains.
141. The flood risk assessment submitted with the planning application confirms that surface water will be managed via sustainable drainage systems, including range source control measures (permeable paving, water butts etc.), trapped gullies and catchpits on highway manholes (pollution avoidance), surface water attenuation and flows off the site replicating existing hydrology (i.e. discharge at existing greenfield rates). The Council's

Ecology, Tree and Landscape Ecology Officer has requested clarification that the SUDS infrastructure would be separate from the public open space (paragraph 32 above). The applicant has confirmed that some SUDS infrastructure is intended to be positioned below part of the open space. This does not mean the development is contrary to planning policies relevant to SUDS or public open space, but means it is unlikely the Council would adopt the open space because of the additional risks and liabilities arising from the SUDS infrastructure beneath the surface. This means it would fall upon the developer to set up a Management Company to manage these areas. Resolution of the management of the public open spaces and SUDS infrastructure could be secured by means of a planning condition and/or planning obligation under S106 of the Town and Country Planning Act 1990.

142. The planning application is accompanied by a Phase I contamination report. This concludes the site has not been unduly impacted by former land uses (allotments/agricultural land) and groundwater underlying the site is not regarded as a sensitive receptor. Furthermore, ground gases are considered to pose a low risk. The Council's Environmental Health team has requested the imposition of a condition requiring the submission of a detailed scheme of investigation into potential contamination, including measures to secure any remediation necessary.
143. The Environment Agency (risk of flooding, contamination and pollution control and drainage), Anglian Water Services (drainage and pollution control) and the Council's Environmental Health Team (contamination and pollution control) have not objected to or raised concerns about the application proposals. All have recommended the imposition of reasonable conditions upon any potential planning permission to secure appropriate mitigation.
144. The proposals are considered acceptable with regard to flood risk, surface water drainage and pollution (contaminated land and potential contamination of water supply) considerations.

Impact upon education

145. The County Council as Local Education Authority has confirmed the village school will reach its 315 place capacity in the near future and before any new pupils are likely to emerge from the development. This means that the 14 primary school aged pupils emerging from these development proposals would need to be accommodated on a temporary basis whilst a new primary school facility is built in the village.
146. In isolation it is likely that the Local Education Authority would be able to cater for the educational needs of the 14 pupils emerging from this development at the existing primary school. However, the cumulative impact of pupil yields emerging from other planning applications proposing significant new housing development in the village also needs to be considered, This is assessed later in this section of the report beginning at paragraph 186 below. Developer contributions to be used towards the early years (pre-school) education and for land and build costs of providing a new primary school in the village are discussed at paragraphs 211 and 212 below.

147. The County Council has confirmed there is sufficient capacity at existing secondary schools to accommodate pupil yields forecast to emerge from these development proposals.

Design and Layout

148. The Framework states the Government attaches great importance to the design of the built environment and confirms good design is a key aspect of sustainable development and is indivisible from good planning. The Framework goes on to reinforce these statements by confirming that 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.
149. Core Strategy Spatial Objective H2 aims to provide a sufficient and appropriate mix of housing that is ... designed to a high standard. Design aspirations are also included in Spatial Objectives ENV4 (high standard of design) and ENV5 (community safety and crime reduction through design). The Objectives are supported by policies CS5 and CS13 which require high quality designs which reinforce local distinctiveness and take account of the need for stronger and safer communities. Policy CS5 confirms design that does not demonstrate it has had regard to local context and fails to enhance character will not be acceptable.
150. Saved Local Plan policy 4.14 requires the layout and design of new housing developments to respect the established pattern and character of development in the locality and saved Policy 9.2 requires development proposals in rural areas to be of a high standard of layout and design.
151. The application seeks full planning permission for development so details of the site layout and appearance of the dwellings are included for consideration.

Relationship to context

152. The application site is on the north extreme of the village and effectively 'bolts-on' to an existing modern housing estate. The site is detached from the core of the village, a designated conservation area, and has no visual relationship to the more vernacular buildings along the village High Street. The proposal's organic, informal layout, mixture of standard house types, and materials reflects the character of the existing housing in Briscoe Way and Burrow Drive.

Connectivity

153. Owing to the 'backland' location of the site there are limited opportunities for connections to be made back into the village footpath and highway network. However there are two points of access from the site into Briscoe Way (Vehicular and pedestrian/cycle) and Burrow Drive (pedestrian/cycle and emergency vehicle) so the development maximises its opportunities to connect back into the village. Furthermore, opportunities to make connection to any further future development to the north and west of the site are provided.

Existing trees and hedgerows and new planting

154. The site is a treeless site which is not surprising given its existing agricultural use. There are some existing trees overhanging the east site boundary marking the rear gardens of some dwellings in Elm Close and these would not be affected by development. Mature hedgerows along the south boundary of the application site which mark the edge of the existing housing estate at Briscoe Way would be retained.
155. The application proposals include new hedgerow planting to the outer 'countryside' boundaries, with opportunities to provide some trees dispersed within it. In time this landscaping would mature to soften the impact of the development on the immediate countryside. New planting is also proposed in landscaped areas within the development, particularly alongside the new internal roads. Some of these will be within front garden areas of the new dwellings and thus have varying chances of becoming established and maturing. Other planting is illustrated within the open spaces.
156. Details of the planting scheme, including its implementation and subsequent maintenance could be secured by condition. The landscaping proposals are considered adequate for the development at this location.

Parking provision

157. The private dwellings are each provided with at least 2 off road car parking spaces, some are shown to have 3 per dwelling via a mix of covered (garaged) and open spaces. Car parking for the affordable units is provided in communal areas at an average of 1.5 spaces per unit. The level of parking proposed is acceptable and accords with the adopted Suffolk Advisory Parking Standards.
158. It is important to ensure car parking provision is well designed and adequate such that it would not lead to on-street parking on the new and existing estate roads. The majority of the dwellings have parking contained within the curtilage (garaged or open). Communal parking courts are provided for the affordable units but these would not require future residents to drive past their own home before reaching their designated parking space in a rear parking court. Rear communal car parking areas are generally recognised as likely to lead to on-street parking in preference to a less-conveniently located parking court. Although parking courts are an undesirable design feature their presence alone cannot merit a refusal of planning permission and the visual impact of the courts must be taken in to the overall balance.
159. There are unlikely to be general parking problems arising from the proposed design and layout of the scheme.

Efficiency of layout

160. Some of the parking courts proposed would be to the side of houses, accessed directly from the street. The use of single-sided access roads serving plots around the public open space would be an inherently inefficient use of land, but this needs to be balanced against the design and crime prevention benefits of providing built enclosure to and natural surveillance of, the open space.

161. The site is clearly pressured, in terms of the quantity and mix of housing it is expected to accommodate, and in consequence it needs to be laid out efficiently in order to achieve an acceptable result. There is no evidence the applicants have tested the efficiency of the layout proposed to demonstrate that the potential of the site had been optimised in the way sought by the third bullet point of paragraph 58 of the NPPF;

Planning decisions should aim to ensure that developments ... optimise the potential of the site to accommodate development, create and sustain and appropriate mix of uses and support local facilities and transport networks.

162. Some inefficiencies of layout are an inevitable result of the absence of a highway frontage and the consequential fixed points of access. Others flow from the demands of the local authorities, such as the requirement to provide secondary access for emergency vehicles (Burrows Drive) and for the provision of public open space and the need to provide it with natural surveillance and enclosure. Other inefficiencies are introduced by the inclusion of a number of bungalows in the scheme (which tend to require larger plot sizes than 2-storey housing). Consequences flow, in terms of place-making, from the efficiency with which the site is used. These are considered in the following paragraphs.

Placemaking

163. It is perfectly reasonable to use standard house types in new development but essential to configure them to contribute to quality of place. The urban design of the scheme could be improved by designing the configuration of standard house types to contribute to the quality of space.
164. It is possible to discern, from the proposed site layout, that there would be instances of the creation of a sense of place; for example the enclosure of the public open space and the greater height of the affordable flats creating a focal point. Elsewhere, however, there are some areas which would be less successful in place-making terms including (in particular) plot 10, a bungalow which is to be set back behind other dwellings without a frontage. Many of the spaces and streets would have little sense of enclosure (because of spacing and positioning of the bungalows) or of design and appear to be no more than pragmatic arrangements of houses and roads to fit the site and its shape.
165. Criticism of any proposal on design matters is a matter of judgement and balance; 'missed Opportunities' and matters which could be improved upon rather than matters which actually cause harm. The future residents of the scheme would experience a high quality living environment with well designed homes, off-street parking, a centrally located and accessible area of public open space and (for most of the private dwellings) generous gardens.

External materials

166. The proposed materials (ref paragraph 3 above) would be contiguous with those used to face the existing Briscoe Way housing development using similar colours and textures. The materials palette is considered acceptable.

Cycle and bin storage provision

167. The private dwellings and the two affordable dwellings would be able to utilise their own space to provide for bin and cycle storage. All have access to private rear amenity spaces such that these could be stored away from the public realm. Less opportunity would exist for the occupiers of the flats whilst these do have private dedicated amenity space per unit, they are much smaller than those provided to the dwellings. Less opportunity therefore exists for the occupiers of the flats to store their bins and cycles. A communal bin store is illustrated on the plans but a clear strategy for bin and secure cycle storage will be required. This could be secured by condition.

Conclusions on design matters

168. The relatively hard, urban character of the housing area would be adequately balanced by the open space, landscaped internal spaces and the new boundary planting.
169. Some elements which would contribute to the character of the development are as yet not fully specified or would require to be secured by conditions. These include renewable energy provision and public lighting. However, there is no indication that any of these matters would not result in a satisfactory outcome if left to be resolved through conditions.
170. The proposal would be as connected to adjoining development as it could be. The layout takes a varied approach to the question of frontages which is not inherently wrong but in places leads to inefficiencies of land use and missed opportunities for place making. Some efforts at place making are evident but there is one instance of a less than desirable outcome which is the positioning of plot 10.
171. After considering the elements which would contribute to the character of the development itself, it is concluded that the scheme is capable of improvement in a number of elements but which would certainly not, by themselves, amount to a reason for refusal but which need to be taken into account in the overall balance.

Impact upon residential amenity

172. The protection of residential amenity is a key component of 'good design'. The Framework states (as part of its design policies) *good planning should contribute positively to making places better for people*. The Framework also states that planning decisions should aim to (inter alia) avoid noise from giving rise to significant adverse effects on health and quality of life as a result of new development.
173. Vision 1 of the Core Strategy seeks to provide 'a higher quality of life' for residents. Saved Local Plan policy 4.15 seeks to ensure new housing developments do not result in the loss of residential amenity.
174. The amenities of occupiers of dwellings abutting (backing on to) the application site would not be adversely affected by development. The design includes bungalows on all plots which abut the south boundaries of the site (adjacent to the existing Briscoe Way housing estate) in order to safeguard against the potential issues of dominance or overlooking of these

dwellings. There are some two-storey units proposed to abut the eastern boundary where the application site abuts the rear gardens of dwellings fronting Drift Road, but these back on to large garden areas such that the amenities of the occupiers of the dwelling in Drift Road would not be compromised.

175. The potential issue of the development being adversely affected by noise generated by aircraft using the nearby Lakenheath airbase has been adequately considered by the applicants. The noise report submitted with the planning application has been considered by the Council's Environmental Health Officer whom has not raised any concerns or objections, subject to the recommendations of the report being secured by condition. Whilst the dwellings would be constructed in an area affected by noise from military aircraft, this would be intermittent and capable of some mitigation through design (protection of internal living space). Furthermore the dwellings are not likely to be affected at night when aircraft at the base is normally grounded. A condition could be imposed requiring precise details to be submitted for subsequent approval and thereafter implemented in the construction.
176. Whilst the development proposals are not likely to impact upon the amenities of occupiers of existing dwellings close to the site boundaries, the future occupants of the dwellings would be subject to aircraft noise. This is considered to be a dis-benefit of the development which is to be considered when balancing the benefits with the dis-benefits in upon considering whether planning permission should be granted.

Loss of agricultural land

177. The Framework states where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
178. The development of agricultural land (green field sites) in the District is inevitable given the level of growth planned for by the Core Strategy to 2031. There is not a sufficient stock of available previously developed land (brownfield land) at appropriate locations to accommodate new development in this period. Accordingly, the future development of greenfield sites is inevitable.
179. The application site is Grade 3 agricultural land (good to moderate) and whilst it is not regarded as 'poor quality' land (ref DEFRA agricultural land classifications) its loss is not considered significant. Nonetheless the development of Grade 3 agricultural land which is currently of use for agriculture is a dis-benefit of the scheme. Whilst not an issue that would justify a refusal of planning permission on its own, it is an issue to be taken into account in the overall balance of weighing the development's benefits against its dis-benefits.

Sustainable construction and operation

180. Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their Local Plans "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change".

181. The Framework confirms planning has a key role in helping shape placed to (inter alia) secure radical reductions in greenhouse gas emissions and supporting the delivery of renewable and low carbon energy. The Government places this central to the economic, social and environmental dimensions of sustainable development.

182. The document expands on this role with the following policy:

In determining planning applications, local planning authorities should expect new development to:

- *comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- *take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.*

183. The importance the Government placed on addressing climate change is reflected in the Core Strategy Visions (Vision 1) and Spatial Objectives (ENV2 and ENV3). Core Strategy Policies CS4 and CS5 set out requirements for sustainable construction methods. There are also emerging policies relating to sustainable construction set out in the Joint Development Management Policies document (DM2, DM7 and DM8), but these are the subject of currently unresolved objections which means the policies can be attributed only limited weight at the present time.

184. The Planning Statement (re-confirmed by the Design and Access Statement) submitted with the planning application confirms the following;

- *We confirm in accordance with CS4 that low water volume fittings will be used in the dwellings together with high levels of insulation. Water run-off from the development will be mitigated by a series of soakaways, which the chalky soil is well-suited to accommodate.*
- *In accordance with [emerging] policy DM7 the proposals have been designed to achieve the highest feasible standards of sustainable design and construction. The scheme will be designed to comply with the relevant Part L Building Regulations that are in effect.*
- *Low flow rate taps and dual flush toilets are proposed to be installed to reduce water use and the refuse store will incorporate separate storage for waste and recycling.*

185. Other than the statements set out above, the applicants have not attempted to address the requirements of the relevant 'sustainable construction' policies. In particular there is no confirmation of measures that will be taken to reduce the use of energy from centralised sources (i.e. via use of solar panels, air source heat pumps etc.). This matter can reasonably be addressed by conditions such that an overall sustainable construction strategy is agreed, alongside details of measures to implement that strategy, all prior to the commencement of any development.

Cumulative Impacts

186. Members will note there are a number of planning applications for major housing development currently under consideration, three of which are before the Committee for decision at this meeting. Furthermore, as the Development Plan progresses and the Site Allocations Document evolves, further sites are likely to be allocated for new residential development irrespective of the outcome of these planning applications. Whilst the evidence base behind the Development Plan documents will assess potential cumulative impacts of any formal site allocations, no such assessments have been carried out with regard to the potential cumulative impacts of the current planning applications.
187. This sub-section of the officer assessment considers potential cumulative impacts upon village infrastructure of the three planning applications on this Committee agenda (references DC/13/0660/FUL, F/2013/0345/OUT and F/2013/0394/OUT).
188. Suffolk County Council and Lakenheath Parish Council suggested that a meeting with key community stakeholders should take place before these planning applications are determined by the Local Planning Authority. This meeting has now occurred and was attended by representatives of Forest Heath, Suffolk County Council, Lakenheath Parish Council, the Primary School (Head Teacher and Governors) and members of the community.

Education

189. The three planning applications together (288 dwellings) would generate approximately 72 children of primary school age once all have been built and occupied. The existing village primary school has reached capacity and by the time the construction of these developments is underway (if all are granted and commence early) with occupations and new primary pupils emerging, the school will have filled its 315 pupil place capacity.
190. The County Council has instructed a land agent to scope the village for potentially suitable sites that may be available for a new primary school. This work is underway and the County Council is in discussion with representatives of various landowners/developers.
191. A site for a new primary school facility is yet to be secured such that the County Council cannot guarantee its provision at this point in time. Your officers consider it is likely a site will emerge either as part of work on the Site Allocations Development Plan document or in advance given that work is already underway. It is unfortunately that some children may have to leave Lakenheath in order to access a primary school place on a temporary basis as a consequence of new housing development being permitted (should a temporary solution not be found at the existing village school site) but this is not an uncommon phenomenon in Suffolk or the country as a whole.
192. The (potential) need for some pupils to travel to a school outside of Lakenheath would impact upon the sustainability credentials of the proposals and are regarded as a dis-benefit of development in advance of a new school site being found. It is important to note, however, that the County Council has confirmed school places would be available for all pupils emerging from these development proposals, even if they are all built early

on and concerns have not been expressed by the Authority that educational attainment would be affected or threatened should these developments go ahead. It is your officers view (particularly in the absence of confirmed objections from the Local Education Authority) that the absence of places for children at the nearest school to the development proposals is not in itself sufficient to warrant a refusal of planning permission but the issue (both individually for this proposal and cumulatively with the other extant proposals for major housing development at Lakenheath) needs to be considered as part of the planning balance in reaching a decision on the planning applications.

193. In weighing up the benefits and dis-benefits of development in the balancing exercise, it is important to note that the development proposals would provide proportionate funding for the erection of a new primary school. Accordingly, the applicants have done all they can possibly do (and all they have been asked to do) to mitigate the impact of their developments upon primary school provision.

Highways

194. In its most recent representations about this planning application (received 8th August – paragraph 24 above), the Strategic Planning department at Suffolk County Council has for the first time raised concerns that the highway impacts of development upon the village (both from the new school and cumulative impacts from village wide development) are uncertain. This is in the context of the Local Highway Authority raising no objections to any of the individual planning applications, subject to the imposition of conditions (paragraphs 19 and 20 above).
195. These concerns are not backed up with evidence or a considered analysis of the nature of the possible impacts (i.e. it is not clear which parts of the local highway network would be particularly vulnerable to new housing growth at Lakenheath). This matter needs to be considered further by the County Council in liaison with the applicants, but given the issue has been raised so late in the planning process (more than a year after the first of the three planning applications was registered), officers are recommending this work continues after Members have considered the three planning applications and, if a reasonable package of highway works can be demonstrated as being necessary to mitigate the likely highway impacts of these development proposals (and anticipated growth via the emerging Local Plan) the developers could be asked to make a proportionate contribution towards the package. These contributions could be secured via a S106 Agreement. The officer recommendation at the end of this report is worded to secure a strategic highway contribution should it be deemed necessary and is adequately demonstrated.

Special Protection Area

196. The potential cumulative recreational pressure impacts of the Lakenheath housing developments upon the Special Protection Area are discussed above in the Natural Heritage sub-section of this report.

Landscape

197. Given the locations of the three proposed housing developments around Lakenheath, no cumulative landscape impacts are anticipated despite all

three sites being located on the edge of the village. Lakenheath is a sizeable village and the development proposals would not represent a significant expansion to it.

Utilities

198. The potential cumulative impact of development upon the sewerage network was a concern of officers, particularly as the IECA study identified a tipping point of 169 dwellings before the Treatment Works reaches capacity. Whilst each planning application in isolation could be accommodated within this identified headroom, the three proposals in combination would clearly exceed it.
199. Anglian Water Services has not objected to any of the three planning applications and confirmed for each one there is adequate capacity within the system to accommodate the increased flows from development. Upon further questioning about potential cumulative impacts and the findings of the IECA study, Anglian Water Services has confirmed the following;
- *MCert Flow Monitor was installed at the Lakenheath Water Recycling Centre on 28 October 2010 which is after the Infrastructure and Environmental Capacity Assessment (IECA) Study and the Water Cycle Study. Please note that both of these studies were high level and were utilising best available data.*
 - *Based on the MCert flow monitor data over the past four years, it has been established that up to 1000 properties could be accommodated at the Lakenheath Water Recycling Centre. Therefore, the proposed 288 dwellings in total for the three planning applications stated in your email dated 10 July 2014 could be accommodated at the Lakenheath Water Recycling Centre.*
200. In light of this explanation, which updates and supersedes evidence presented in the IECA study, officers are satisfied the development proposals would not have adverse cumulative impacts upon the sewerage infrastructure serving Lakenheath.
201. There is no evidence to suggest there would be significant cumulative impacts upon water and energy (electricity) supplies to the village given the respective capacities identified in the IECA study.

Planning Obligations

202. The Framework repeats the tests of lawfulness for planning obligations which are derived from Regulation 122 of The Community Infrastructure Levy Regulations 2010. The tests are that planning obligations should:
- *be necessary to make the development acceptable in planning terms.*
 - *be directly related to the development, and*
 - *be fairly and reasonably related in scale and kind to the development.*
203. The Framework also states that pursuing sustainable development requires careful attention to viability and costs, such that sites should not be subject to a scale of obligations that their ability to be developed viably is threatened.

204. The Framework advises that in order to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
205. Core Strategy Spatial Objective ENV7 seeks to achieve more sustainable communities by ensuring facilities, services and infrastructure are commensurate with development. Core Strategy Policy CS13 sets out requirements for securing infrastructure and developer contributions from new developments.
206. The developer has confirmed a willingness to meet the required obligations 'subject to viability'. No claim to reduce the level of contributions on viability grounds has so far been claimed by the applicants. The recommendation (at the end of this report) therefore assumes the development can provide a fully policy compliant package of measures.
207. The following developer contributions are required from these proposals.

Affordable Housing

208. The Framework states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing. It also states that policies should be set for meeting the identified need for affordable housing, although such policies should be sufficiently flexible to take account of changing market conditions.
209. Core Strategy Spatial Objective H2 seeks to provide a sufficient and appropriate mix of housing that is affordable, accessible and designed to a high standard. Core Strategy policy CS9 requires 30% of the proposed dwellings (20.1 dwellings in this case) to be 'affordable'. The policy is supported by Supplementary Planning Guidance which sets out the procedures for considering and securing affordable housing provision (including mix, tenure, viability and S106).
210. The applicants have proposed 20 of the 67 dwellings as 'affordable'. The remaining 0.1 of a unit could be secured as a financial contribution to be used to provide affordable housing elsewhere in the locality. The mix and tenures have been agreed with the Council's Strategic Housing team (paragraphs 26-28 above).

Education

211. The Framework states the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. It advises that Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.
212. Core Strategy Policy CS13 (b) considers educational requirements as a key infrastructure requirement. The Local Education Authority (Suffolk County Council) has confirmed there is no capacity at the existing primary school to

accommodate the additional pupils forecast to be resident at the proposed development and has requested a financial contribution from this development that is to be used towards the construction of a new primary school in the village. It has also confirmed a need for the development to provide a contribution to be used towards pre-school provision in the area to cater for the educational needs of pre-school children (aged 2-5) that are forecast to reside at the development. The Authority has confirmed there is no requirement for a contribution to be secured for secondary school provision. The justification for these requests for financial contributions and the amounts are set out at paragraph 22 above.

Public Open Space

213. The Framework confirms that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
214. Core Strategy Spatial Objective CS2 seeks to promote an improvement in the health of people in the District by maintaining and providing quality open spaces, play and sports facilities and better access to the countryside. Policy CS13 (g) considers provision of open space, sport and recreation as a key infrastructure requirement.
215. Saved Local Plan policies 10.2 and 10.3 address play space requirements and state such areas will be provided as an integral part of new residential development. It is also stated that provision will be made for a wider area than just the development site.
216. These Development Plan policies are expanded upon via the adopted Supplementary Planning Document for public open space, sport and recreation. This document sets out the requirements for on-site and off-site provision and maintenance. In this case, 1,507 sq. m of public open space is provided as part of the site layout and a contribution of £350,250 is required and will be used for sport, recreation and open space provision/enhancement away from the site. A condition could be imposed upon any planning permission granted to ensure the open space area provided at the site is properly provided, managed and maintained.

Libraries

217. The Suffolk County Council has identified a need to provide library facilities for the occupiers of this development and has requested a capital contribution of £14,472.

Health

218. The NHS Property Services has confirmed there is sufficient capacity in the existing health infrastructure (i.e. GP surgeries) to cater for the additional demand for local services this development would generate. Accordingly, no health contribution is to be secured from the proposed development.

Summary

219. With these provisions in place, the effects of the proposal on local infrastructure, including affordable housing, open space, recreational facilities, education, and libraries would be acceptable. The proposal would

comply with Core Strategy Policy CS13 by which the provision or payment is sought for services, facilities and other improvements directly related to development. The proposed planning obligations are considered to meet the CIL Regulation 22 tests set out at paragraph 202 above.

Conclusions and Planning Balance

220. Development Plan policies relating to the supply of housing are out of date, by virtue of the fact that a five year supply of deliverable housing sites cannot be demonstrated.
221. With this background it is clear that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole. There are no specific policies in the Framework which indicate that this development should be restricted. National policy should therefore be accorded great weight in the consideration of this planning application, especially the presumption in favour of sustainable development, which officers consider this proposal represents.
222. In relation to the economic role of sustainable development, the proposal would generate direct and indirect economic benefits, as housing has an effect on economic output both in terms of construction employment and the longer term availability of housing for workers. The development would provide additional infrastructure of wider benefit – including, education provision (longer term) and public open space.
223. In terms of the social role of sustainability the development would enhance the local community and provide a level of much needed market and affordable housing to meet the needs of present and future generations. The development would, on balance, result in a built environment of good quality. The proposal would rely on, and to a limited extent enhance the accessibility of existing local services – both within Lakenheath and further afield.
224. The absence of capacity at the local primary school to cater for the pupils emerging from this development on a permanent basis is regarded as a dis-benefit of the development. The in-combination effects of this development with other planned housing developments at Lakenheath could have significant impacts upon local primary education provision and could force some pupils to leave the village to secure their primary school place. This is tempered somewhat, however, by temporary nature of the arrangement whilst a new school is built and in the absence of objections from the Local Education Authority. Furthermore, the Local Education Authority has not suggested that pupil attainment would be adversely affected by these temporary arrangements.
225. In relation to the environmental role it is self-evident that the landscape would be changed as a result of the proposal albeit this would only be perceptible at the immediate location of the application site once new landscaping has opportunity to mature. In advance of this, impacts upon the landscape would be much greater. Good design and the retention of existing vegetation and provision of new planting would mitigate the landscape effects to a great degree. Of significance is the fact that the site does not benefit from any specific ecological, landscape or heritage designation, unlike large areas of the District, and the effect on the

character of the settlement would be acceptable. Longer landscape views would be limited, particularly after new landscaping has fully matured.

226. The development proposals would be impacted adversely by noise from aircraft operating from the nearby runways at the Lakenheath airbase. This is not capable of being fully mitigated and the external areas (eg garden spaces) would be particularly exposed to the effects of aircraft noise. Internal spaces are capable of mitigation through appropriate design and construction measures.
227. The progress of the LDF has been slow to date owing largely to the successful challenge of the Core Strategy (CS7) in the High Court, and its future progress is uncertain, given that the Single Issue Review and Site Allocation documents have reached only the early preparatory stages in the process with public consultation yet to be carried out. In any event, there is no evidence that the proposal would be premature to or prejudice the development plan process.
228. The lack of a five year supply of deliverable housing land, combined with the historic (but not persistent) under supply of housing, is an important material consideration. To the very limited extent that the evidence demonstrates material considerations against the proposal – essentially relating to the limited local landscape effects, loss of agricultural land of good to moderate quality and some design weaknesses in parts of the layout – this consideration (benefit) significantly outweighs those concerns (dis-benefits) and points clearly towards the grant of planning permission in this case.

Recommendation

229. That, subject to no concerns, objections or new material planning issues being raised by Natural England, the RSPB or the Suffolk Wildlife Trust, outline planning permission be granted subject to:

The completion of a S106 agreement to secure:

- Affordable housing (30% = 20 units on site and 0.1 units by means of a developer contribution)
- Education contribution (Primary School - £251,090)
- Pre-school contribution (£42,637)
- Libraries Contribution (£14,472)
- Public Open Space contribution (Provision on site and contribution of £350,250)
- Strategic Highway Contribution (should this be deemed compliant with CIL Regulation 122 – a proportionate contribution would be appropriate, sum to be determined)
- SPA Recreational Impact Contribution – which may include monitoring of potential impacts from development (should this be deemed compliant with CIL Regulation 122 – sum to be determined)
- Any further clauses considered necessary by the Head of Planning and Regulatory Services.

230. Following completion of the planning obligation referred to at paragraph 229 above, the Head of Planning and Regulatory Services be authorised to grant planning permission subject to conditions, including:
- Time limit (3 years for commencement)

- Materials (use of those proposed)
- Sustainable construction (further details to be approved and thereafter implemented)
- Bin and cycle storage strategy for the affordable units (details to be approved and thereafter implemented)
- Public open space (strategy for future management and maintenance)
- Landscaping (precise details of new hard and soft landscaping)
- Retention and protection of existing trees and hedgerows
- Ecology (enhancements at the site)
- Construction management plan
- As recommended by LHA
- Contamination & remediation (further investigations and any remediation necessary)
- Means of enclosure
- Noise mitigation
- Fire Hydrants
- Waste minimisation and re-cycling strategy
- Implementation of the surface water drainage scheme.
- Any additional conditions considered necessary by the Head of Planning and Regulatory Services.

231. That, in the event of the Head of Planning and Regulatory Planning Services recommending alternative (reduced) Heads of Terms from those set out at paragraph 229 above, or Natural England the RSPB and/or the Suffolk Wildlife Trust raise objections concerns or substantive issues about the proposals which have not already been considered by the Committee, the planning application be returned to Committee for further consideration.

232. That in the event the applicant declines to enter into a planning obligation to secure the Heads of Terms set out at paragraph 229 above for reasons considered unreasonable by the Head of Planning and Regulatory Services, planning permission be refused for the following reasons:

- i) Unsustainable form of development not mitigating its impact upon, education provision (primary and pre-school), open space, sport and recreation and libraries (contrary to the Framework and Core Strategy policy CS13 and saved Local Plan policy 10.3).
- ii) If appropriate following further investigation; adverse cumulative impacts upon, the highway network and the Special Protection Area (from increased recreational pressure)
- iii) Non-compliance with affordable housing policy (contrary to Core Strategy policy CS9 and supporting SPD document)

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online:

<http://planning.stedmundsbury.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=MW5ML2PDH4S00>

Alternatively, hard copies are also available to view at Planning and Regulatory Services, District Offices, College Heath Road, Mildenhall, IP28 7EY

Case Officer: Gareth Durrant (gareth.durrant@westsuffolk.gov.uk)
Telephone No: 01284 757345