

SAFE Response to Application DC/19/05956- Post Mill Lane

SAFE strongly opposes this Application

This is an Application for 21 houses as an extension to the existing Post Mill development giving an urban housing estate of 39 houses. No Planning Gain is proposed.

Policy Background

Since November 2018 when the original Post Mill Application was heard a number of significant policy changes have come about.

*MSDC have now confirmed a minimum 5 year housing land supply. This is important as without this number a number of Planning Policies can be ignored.

*The Joint Draft Local Plan has been consulted upon and whilst not yet adopted it does carry some weight. The Plan has corrected the error of our being a " core " village . We are now correctly identified as an "Hinterland" village capable of sustaining limited development. Currently there is no timetable for the adoption of the Plan.

*The Neighbourhood Development Plan is due to go to referendum in late January/ early February 2020. Whilst not yet adopted it does carry some weight. The NDP does not identify Post Mill as a potential development site. To include this site would push the agreed housing ceiling, of 60 houses over the Plan period, well over target. To support this Application would undermine the validity of the NDP.

* The site is not within the Settlement Boundary. Policy CS2 does carry some weight and should be applicable to Post Mill..

*Any potential development in Weybread should be factored in as it is integral to the infrastructure in Fressingfield. This would impact on highways, the medical centre, the school and pollution.

Post Mill Appeal

In November 2018 the Post Mill Application for 24 houses was not approved by MSDC for the following reasons

1. Outside the Settlement Boundary.
2. Contrary to Local Planning Policy
3. Would result in localised flooding
4. Would impact on a listed building.

The decision was appealed by the Developer. The Appeal was overruled and costs were not awarded. The plank of Inspector's argument was the visual impact of the proposed

development of Ladymeade Cottage, a listed building. In this Application the Developer has partially addressed this issue by removing all buildings directly behind Ladymeade and compressing 18 houses with very small gardens into a tight space. Whilst the development does not impede upon Ladymeade it does compromise the setting of both Ladymeade and an adjacent Listed Building.

The Inspector did not give weight to the flooding /sewerage issue because Anglian Water raised no objection. **Critically, since the time of the Inspector's Report Anglian have changed their position.** Whilst accepting that there is capacity within the sewerage for normal dry flows at the time of persistent rainfall the sewerage is flooded. The CEO of Anglian Water wrote on 14th November 2019 " Our foul sewer is being overwhelmed by other water sources." It is significant that the Applicant is reliant on Preplanning advice from Anglian Water on the original scheme (para7.4.2) this has not been updated. It is also significant that the developer for the John Shepherd and Stradbroke Road sites is proposing mitigation measures to reduce the capacity within the sewer at times of heavy rainfall to allow extra capacity for surface water. For the developer of Post Mill to ignore this and rely on an outdated Appeal decision is not sensible.

SAFE believe that this Application clearly runs contrary to paragraph 163 of the NPPF and will increase the risk of flooding elsewhere.

General

The majority of the supporting reports and data collection is seriously out of date and relates to the previous Application. Decisions cannot be reached on information which is no longer valid.

Highways

The cumulative impact of the this and the proposed two developments would increase the number of cars in the village by approximately 100 cars.

Whilst the Transport Study is dated March 2019 all of the data relates back to the previous scheme as do the drawings. The correspondence log between SCC highways and the developer ends abruptly on 13/11/18 - ten days before the initial hearing.

In attempting to present the development as being close to many local amenities numerous bus stops and a post box are cited. As there are no public buses the proximity to bus stops is a complete irrelevance.

The increased traffic will impact significantly on New Street as New Street is the only way in and out for the Post Mill residents. We have produced papers on congestion and pinch points as well as the large number of unreported and reported accidents fressingfieldhousing.org New Street is of particular concern as it is at the centre of the village. The War Memorial is another worrying junction being a four way junction. It is just

statistically untrue to state that the increase in the number of cars will not increase the number of accidents. If you have more cars statistically there will be more accidents. None of the proposals within the transport document meet the requirement for green and sustainable transport. Policy T 10 is of relevance .

Pedestrian safety

The highways report does not examine pedestrian trip rates either now or projected into the future. The Report does state that short sections of 4 pedestrian routes are " unsafe" then does proposes almost nothing in mitigation (para 2.6.4.)

On Road Parking

Throughout the area many roads have no walkways and on street parking is very common. The Medical Centre, shop, and Anglican Church all have insufficient "off road " parking. With an increase in population and increased use of these venues there will be more parking on very narrow streets. Parking for the Anglian Church is not limited to Sundays because of bell ringing , meetings and choir practice . There is permanent on street parking on Church Hill as very few houses have off street parking this is very narrow and there are no footways in this area .

The entrance to Post Mill is a particular problem as increasing numbers of cars park in this area as overflows from the Medical Centre

Local Employment

There 58 whole time equivalent posts in the village. (Total population 1021) Part time work is available at the shop and Fox and Goose. Full time posts are at the surgery and School, although most of these full time personnel choose to live outside the village. CP Davidson, the main employer is based outside the village. The vast majority of villagers leave the village by car to go to work in neighbouring towns. There are no cycle lanes and the roads are narrow and overcrowded. Some people commute to London, therefore driving to the station at Diss.

Medical Care

The small amount of spare capacity at the surgery will be taken up by the residents of the 51 new houses approved , but not yet built. Waiting times for consultations have already significantly increased and this will get worse. Parking at the surgery is already inadequate and more patients will result in more overflow parking in New Street. There is no space to expand the car park because of adjacent recent house building.

A new medical centre, providing a full range of services is professionally priced at £12 million. There is no funding available for either a rebuild or enlargement (which would be physically difficult). The only alternative would be funding by the developer.

Education

One of the major planks of the Applicants submission is the support from the School Governors in needing the Post Mill Development to support pupil numbers at the school. Whilst SCC have not commented on this Application in response to the proposed development at John Shepherd Suffolk County Council wrote on 20th December 2019 "The existing primary is at capacity and it is clear that the site proposal will add to challenges in terms of adding capacity." The viability of the school is therefore not an issue.

There is no local secondary school. School Buses or private cars are the only means of getting to the secondary school.

Affordable Housing

A perceived major advantage of the Application is the inclusion of 6 affordable homes. Currently there are 11 families on the local waiting list these can be accommodated in the affordable home provision within the developments approved, but not yet built. Further Affordable housing is surplus to need in the village.

Green Credentials

There will be more residents all with cars as realistically there is no alternative travel in Fressingfield. This will mean more pollution and certainly is contrary to all relevant Guidance

Heritage

The proposal is contrary to Policy HB1 of the adopted Local Plan (1998) which states that the Council places a high priority on protecting the character and appearance of buildings of architectural and historic interest and that attention will be given to protecting the settings of listed buildings. This site is designated as "countryside " and the proposed development will further erode the villages connection to that countryside. Whilst no longer impacting directly on Ladymeade .

The view from Harleston Hill will be compromised as the Post Mill housing estate of 39 houses will be visible in winter. This vista is protected under the NDP.

Flooding and Sewage Egress

Flooding and sewage egress are very serious issues in Fressingfield and of great concern to villagers. They affect the quality of life and create health issues., which have been brought to the attention of Public Health England by Suffolk's Director of Public Health.

There are two discrete, but linked issues. Firstly surface water flooding and secondly the egress of sewage onto the highways and into gardens.

Flooding

We believe that significant flooding is underreported. It occurs primarily in Low Road/Cratfield Road, but serious flooding has also occurred in other parts of the village. We know that it occurred four times in five months between 22 December 2017 and 24th April 2018 and twice in 2019 . It is a long standing problem and has occurred over a number of years. (see SAFE web site fressingfieldhousing.org "Low Road historic flooding" where there are representative photos at 20 year intervals) The problem does not only occur in Winter, but also occurs in Summer (12 July 2016) .Flooding is caused by 3 factors- the overtopping of the Beck, the sewer manholes being raised and the excessive surface water running down from the high point of the village to the low point, Low Road. Fressingfield is unique in being surrounded by hills , to the east (Buckingham) west (Harleston) north (Church Hill)and south (Canser) .The soil is heavy clay and impervious . The roads themselves act as conduits bringing water to the low point of the village, eventually entering the Beck . Increased water into the Beck increases the likelihood of overtopping.

With climate change this situation would be expected to worsen..

Sewage Egress

In Low Road, at times of heavy rainfall the sewerage manhole covers lift and raw sewage and sanitary products spill onto the road and into gardens. The contaminated water flows into the Beck to be dissipated further. The reason for this is that surface water is entering the closed foul sewer thereby reducing the functional capacity of the sewer.

This is a very long standing problem. There exists correspondence between the then MP Michael Lord and the CEO of Anglian Water, Peter Bray. The Chief Environmental Health Officer was also involved.

The problem is becoming more common and more severe. The contamination has been such that Anglian Water have had to provide teams to clean up the debris. Sewage egress has occurred 9 times in the last 2 years.

In May 2018 Dr. Abdul Razaq, the then Director of Public health wrote " I would agree that the situation relating to sewage leaks is not acceptable and unpleasant."

More foul sewage that is discharged into the sewerage the less space there is for surface water thereby increasing the risk of the manhole covers being elevated. This development will impact on the sewerage and result in off site flooding. It is significant that the Applicant for John Shepherd and Stradbroke Road recognises this serious issue and has chosen to investigate possible mitigation. The Applicant for Post Mill ignores the problem and falls back on the Appeal Report which has now been superseded with Anglian Water recognising that under certain circumstances the sewerage does not have capacity.

This objection from SAFE gives many reasons why further significant development should not occur in Fressingfield, primarily because of lack of sustainability.

SAFE Pam Castro on behalf of SAFE - John Castro, John Kelsall , Tim Eastoe, Elizabeth Manero, Abi Maydon, Paul McCann, Michael Miles.

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