

DC/23/01254 – Land North of Laxfield Road.

## FLOODING

Email to SCC flood officer, Burgess Homes and MSDC planning officer:

**DC/23/01254 – Land North of Laxfield Road (adjacent to the cemetery)**

Stradbroke Parish Council <clerk@stradbrokepc.org>

Mon 11/12/2023 13:07

To: Jason Skilton Suffolk County Council; info@burgesshomesltd.co.uk

Cc: Mahsa Kavyani; planning yellow

Dear all

I recently wrote to Mid Suffolk planning team regarding DC/23/01254 - Land North of Laxfield Road.

The Parish Council is concerned about recent flooding in the area and asked whether the Council should be raising concerns with Mid Suffolk or Suffolk as the LLFA.

I have been advised to contact both SCC and the applicant the directly. The Parish Council is concerned that the surface water drainage proposed for this site is not adequate.

I am attaching photos and a video of the area around the site during recent Storm Babet and would ask whether it is possible for the surface water drainage proposal to be revisited in light of the flooding experienced.

The Parish Council is happy to meet on site or via Teams to discuss this.

Thank you.

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Regards

Odile Wladon

Clerk

Stradbroke Parish Council

Attachments: 3 x photos and a video



DC/23/01254 – Land North of Laxfield Road.

**Email from SCC officer:**

**RE: DC/23/01254 – Land North of Laxfield Road (adjacent to the cemetery)**

Jason Skilton <Jason.Skilton@suffolk.gov.uk>

Mon 11/12/2023 13:28

To:Stradbroke Parish Council <clerk@stradbrokepc.org>

Cc:Mahsa Kavyani;BMSDC Planning Area Team Yellow, info@burgesshomesltd.co.uk

Dear Odlie,

Thank you for your email.

As this is a reserved matters application, the principle of development on this site has been set already, when the site was given approved for outline permission DC/19/01343.

The applicant has proposed and the LLFA did recommend approval for the discharge of condition 9 regarding surface water drainage.

The surface water drainage from the proposed development will be restricted to the 1:100+climate change rain fall event. This is in line with the latest national and local policy/guidance.

Kind Regards

Jason Skilton  
Flood and Water Engineer  
Suffolk County Council

**Email to SCC officer:**

**From:** Stradbroke Parish Council <clerk@stradbrokepc.org>

**Sent:** Monday, December 11, 2023 1:46 PM

**To:** Jason Skilton

**Subject:** Re: DC/23/01254 – Land North of Laxfield Road (adjacent to the cemetery)

Thank you for your speedy response.

The point the Parish Council was raising is that the proposed surface water drainage via a grate system does not seem robust enough to cope with the water issues in the area. But if Suffolk as the LLFA are satisfied with the proposed system, then I assume the residents won't experience the same level of flooding once the development is completed.

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Regards  
Odile Wladon  
Clerk  
Stradbroke Parish Council

DC/23/01254 – Land North of Laxfield Road.

**Email from SCC officer:**

**RE: DC/23/01254 – Land North of Laxfield Road (adjacent to the cemetery)**

Fm: Jason Skilton

Mon 11/12/2023 13:50

To: Stradbroke Parish Council <clerk@stradbrokepc.org>

Dear Odile,

The proposed development will certainly not make the existing flood risk any worst.

Kind Regards

Jason Skilton  
Flood and Water Engineer  
Suffolk County Council

**Final correspondence copies to MSDC officer**

**From:** Stradbroke Parish Council <clerk@stradbrokepc.org>

**Sent:** Friday, February 9, 2024 2:00 PM

**To:** Mahsa Kavyani

**Subject:** Fw: DC/23/01254 – Land North of Laxfield Road (adjacent to the cemetery)

Dear Mahsa

I have just realised that you weren't copied into the final stage of the correspondence with Suffolk County Council about the flood risk.

The final two emails are below.

Thank you.

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Regards

Odile Wladon

Clerk

Stradbroke Parish Council

**RE: DC/23/01254 – Land North of Laxfield Road (adjacent to the cemetery)**

Fm: Mahsa Kavyani

Fri 09/02/2024 14:10

To: Stradbroke Parish Council <clerk@stradbrokepc.org>

Hi Odile

Thank you for sharing, I will update the file

Many thanks  
Mahsa

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## HOUSING MIX

**Email to officer:**

**From:** Stradbroke Parish Council

**Sent:** 28 February 2024 16:01

**To:** Mahsa Kavyani

**Cc:** planning yellow

**Subject:** DC/23/01254

Dear Mahsa

The Parish Council has noticed that the applicant for DC/23/01254 has submitted revised plans for the development.

Could you ask them to clarify that the Parish Council has fully understood the changes as per the attached schedule.

Thank you.

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Regards

Odile Wladon

Clerk

Stradbroke Parish Council

Changes to original plans:

Plots	Bedrooms Original	Bedrooms New	Comments
1 - 4	1	1	No changes
5 - 7	2	2	No changes
8	3	3	No change
9 -10	2	2	No change
11	3	2	Bed 3 now a study Overall floor area the same
12	3	2	Bed 3 now a study Overall floor area the same
13	3	2	Bed 3 now dining area Overall floor area the same
14	4	3	Kitchen diner, now kitchen and seating area. Ground floor study now incorporated into living/dining area. Bed 4 now study. Overall floor area the same
15	4	3	Kitchen diner, now kitchen and seating area. Ground floor study now incorporated into living/dining area. Bed 4 now study. Overall floor area the same
16	4	3	Kitchen diner, now kitchen and seating area. Ground floor study now incorporated into living/dining area. Bed 4 now study. Overall floor area the same

<b>17</b>	4	4	No change
<b>18</b>	3	3	No change
<b>19</b>	4	3	Ground floor study now dining room Kitchen diner now kitchen Bed 4 now study Overall floor area the same
<b>20</b>	3	3	No change
<b>21</b>	3	3	No change
<b>22</b>	3	2	Kitchen/diner now kitchen Bed 3 now dining area Overall floor area the same
<b>23</b>	4	3	Ground floor study now dining room Kitchen diner now kitchen and seating area Bed 4 now dressing area and shower room for bed 2 Overall floor area the same
<b>24</b>	3	3	No change
<b>25</b>	3	3	No change
<b>26</b>	4	3	Kitchen diner now kitchen Ground floor study now dining room Bed 4 now study Overall floor area the same
<b>27</b>	4	3	Ground floor study now dining room Bed 4 now study Overall floor area the same
<b>28</b>	4	4	No change

**Response from officer:****From:** Jasmine Whyard**Sent:** 19 April 2024 13:03**To:** Stradbroke Parish Council <clerk@stradbrokepc.org>**Subject:** RE: DC/23/01254

Good afternoon,

The proposed mix of units and bedroom numbers is shown on the proposed floor plans and the most updated plans are on our website. For ease the below table and attached table has been provided by the applicant. This does confirm that the mix accords with STRAD3.

<b>NO OF BEDS</b>	<b>STRAD3</b>	<b>REVISED PLANS – NUMBER OF PLOTS TO MATCH BEDROOM REQUIREMENTS IN LINE WITH STRAD 3</b>	<b>COMMENTS</b>
1	3	4	1 more than proposed by STRAD3 to provide the required/agreed Affordables housing mix
2	8	8	
3+	17 (3+)	16	Includes only 2 x 4 bed homes to provide a mix of homes across the development
<b>TOTAL</b>	<b>28</b>	<b>28</b>	

DC/23/01254 – Land North of Laxfield Road.

I hope this is of use, but please let me know if you require anything further.

Kind regards,  
**Jasmine Whyard, BA (Hons), MSc**

**Response from applicant:**

**Stradbroke Development – Internal Layout**

	Kitchen	Dining Room	Living Room	Utility	WC	Study	Bed 1	Bed 2	Bed 3	Bed 4	Bathroom	Ensuite 1	Ensuite 2
Plot 1		✓					✓				✓		
Plot 2		✓					✓				✓		
Plot 3		✓					✓				✓		
Plot 4		✓					✓				✓		
Plot 5	✓		✓		✓		✓	✓			✓		
Plot 6	✓		✓		✓		✓	✓	✓		✓		
Plot 7	✓		✓		✓		✓	✓			✓		
Plot 8	✓		✓		✓		✓	✓	✓		✓		
Plot 9	✓		✓		✓		✓	✓			✓		
Plot 10	✓		✓		✓		✓	✓			✓		
Plot 11	✓		✓	✓	✓	✓	✓	✓			✓	✓	
Plot 12	✓		✓	✓	✓	✓	✓	✓			✓	✓	
Plot 13	✓	✓	✓	✓	✓		✓	✓			✓	✓	
Plot 14	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓	
Plot 15	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓	
Plot 16	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Plot 17	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓
Plot 18	✓		✓	✓	✓		✓	✓	✓		✓	✓	
Plot 19	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Plot 20	✓		✓	✓	✓		✓	✓	✓		✓	✓	
Plot 21	✓		✓	✓	✓		✓	✓	✓		✓	✓	
Plot 22	✓	✓	✓	✓	✓		✓	✓			✓		
Plot 23	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	✓
Plot 24	✓		✓	✓	✓		✓	✓	✓		✓	✓	
Plot 25	✓		✓	✓	✓		✓	✓	✓		✓	✓	
Plot 26	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Plot 27	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Plot 28	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**Response to Officer:**

**Re: DC/23/01254**

Stradbroke Parish Council <clerk@stradbrokepc.org>

Fri 19/04/2024 14:39

To: Jasmine Whyard

Thank you for confirming - the Parish Council notes that bedroom 4 has been substituted for a study but the floor area and therefore the size of the dwellings has not decreased in any of the revised plans.

The housing needs survey identifies that smaller 3 bedroom properties are required, not houses which will be marketed with a bed 4/study.

It is a shame the developer has chosen not to engage with the Parish Council at all over the development, as the Council could have shared the knowledge of what is required in the village and what is currently not selling on the other new estate.

DC/23/01254 – Land North of Laxfield Road.

Thank you.

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Regards  
Odile Wladon  
Clerk  
Stradbroke Parish Council

Submission by Strategic Housing: attached in full.

**BABERGH AND MID SUFFOLK DISTRICT COUNCILS**

**MEMORANDUM**

To: Jasmine Whyard – Planning Officer  
From: Robert Feakes – Housing Enabling Officer  
Date: 25 April 2024  
Subject: Reserved Matters Application  
Proposal: DC/23/01254

Application for approval of Reserved Matters pursuant to Outline Planning Permission DC/19/01343 dated: 13/07/2021 - Appearance, Landscaping, Layout and Scale for Erection of 28no. dwellings and garages including creation of vehicular access.

Location: Land North Of Laxfield Road Stradbroke Suffolk

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**1. Key Points**

<b>Comment:</b> The affordable housing mix is acceptable, although some further details are requested in respect of the Affordable Housing Scheme and the design of units 4 and 6.
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<b>Holding Objection:</b> It is not clear whether the requirements of LP24 have been met in respect of part M4(2) of the Building Regulations and the Nationally Described Space Standard.
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<b>Objection:</b> The distribution of affordable housing is not supported
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<b>Objection:</b> The open market mix is not consistent with the approach set out in SP01. Furthermore Planning colleagues will need to determine whether the unit mix as described is accurate.
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**2. Housing Need Information**

2.1 The Ipswich Housing Market Area Strategic Housing Market Assessment ('SHMA' – 2017, updated in 2019) confirms an ongoing need for new housing across different tenures, including a significant need for affordable housing.

2.2 The SHMA indicates a need for 127 additional affordable homes per annum in Mid Suffolk. The Council's Choice Based Lettings system (Gateway to Home Choice) has recorded an average of 8 households with a local connection to Stradbroke during 2023-24.

2.3 Please note that this does not directly represent a local need. This indicates the number of households in housing need, registered as having some form of local connection to the parish. Households bid for rented properties based on



their own preferences and may choose to bid for properties elsewhere. Equally, households from other parts of Mid Suffolk could bid for these properties.

- 2.4 At present there are more than 700 households on the Housing Register with a local connection to somewhere in Mid Suffolk.
- 2.5 There is also likely to be a hidden need; households in the locality who have not joined the Housing Register. It is common that households will apply to join the register when they see affordable homes come forward in their locality, when there is an opportunity for a new home.
- 2.6 Within the total requirement for affordable housing, the SHMA indicates a need for 583 Shared Ownership units in Mid Suffolk between 2018 and 2036 (32 per annum).

### **3. Affordable Housing Requirements**

- 3.1 Policy SP02 of the Joint Local Plan sets out the Council's requirements for affordable housing. It sets out a requirement for greenfield sites provide to 35% affordable housing, with the mix to be informed by the relevant district needs assessment.
- 3.2 This application, being for reserved matters, is subject to a Section 106 agreement (dated 8 July 2021) which requires ten affordable homes on site. It also refers to an Affordable Housing Scheme to be submitted for the approval of the Council alongside the reserved matters application, specifying;
- The types location and size of the Affordable Housing Units to be constructed on the Site;
  - The identity of the Registered Provider; and
  - Such other information and reasonable requirements as the District Council may require to enable approval of the scheme including details of how any recycling obligation will be complied with.
- 3.3 It does not appear that a specific document acting as the Affordable Housing Scheme has been submitted, although some of the relevant information has been provided. It would be helpful if a specific document were to be provided such that the affordable housing provision can be formally agreed.
- 3.4 The Section 106 further requires that the affordable units should meet the Nationally Described Space Standards. This is also now required by Joint Local Plan policy LP24.
- 3.5 From reviewing the floor plans of the individual units it appears that the proposed affordable housing mix is as follows:

<b>Tenure</b>	<b>Number of Units</b>	<b>Size (Bedrooms and Bedspaces)</b>	<b>Type</b>	<b>Size (Gross Internal Area)</b>
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Affordable Rent	4	1b2p	Maisonette	Not specified
	2	2b4p	House	Not specified
	1	3b5p	House	Not specified
Shared Equity	2	2b4p	House	Not specified
	1	3b5p	House	Not specified

3.6 The mix of affordable homes is acceptable.

3.7 The floorplans do not specify the gross internal areas of the units. Nor do they show whether or not the affordable homes meet the Nationally Described Space Standard in respect of gross internal areas, bedroom sizes and storage space. **This needs to be clarified.** It appears that the 3-bed affordable rent unit on plot 6 does not meet the bedroom size requirements of LP24.

#### 4. Design Considerations

4.1 The affordable housing is to be integrated through the development, pepper-potted throughout the scheme and visually indistinguishable from the open market homes. The affordable housing should be designed to meet any Homes England requirements in place at the time that the scheme comes forward.

4.2 In line with policy LP24, 50% of the scheme should be designed to meet part M4(2) of the Building Regulations, and all units (open market and affordable) should meet the Nationally Described Space Standards. **It is not clear whether these requirements have been met.**

4.3 The floor plan for unit 4 implies that the unit can only be accessed from the back garden. This is assumed to be an omission – please can this be clarified?

4.4 Policy SP02 requires that affordable housing is integrated into the development. The Council's preference is for 'pepper potting', although a balance has to be struck between distributing affordable homes and clustering them for management purposes. **At present, all the affordable homes are clustered in one part of the site. This does not represent integration.** Furthermore, the affordable homes are clustered around a pumping station.

4.5 The aim should be to have the affordables in three clusters (of 3, 3 and 4 units) if possible. Certainly no fewer than two clusters of five. A cluster in this instance would be defined as a group of affordable units separated from other affordable units by having open market homes between the clusters.

4.6 It is noted that the affordable dwellings will be constructed from the same range of external materials as the open market homes. This is supported.

#### 5. Open Market Mix

- 5.1 In line with Joint Local Plan policy SP01, the site should deliver a mix of open market units which reflects District-wide needs. The SHMA sets out a District-wide requirement in Table 4.4e of Part 2 of the SHMA (2019)<sup>1</sup>.
- 5.2 It is noted that the open market mix has been altered following the original submission, with the number of bedrooms decreasing by way of the provision of rooms described as studies within the units on very similar floorplans. It appears that eight units have been amended in this way.
- 5.3 Officers have considered this matter. Following permission it is not possible to control the use of individual rooms, as long as they are part of or ancillary to the main residential use of the dwellings.
- 5.4 Whilst home working might be considered a benefit, Planning colleagues will wish to assess the potential use of the studies as bedrooms and consider the implications for judging this proposal against SP01 and STRAD3.
- 5.5 It is reasonable to assume that primary living rooms, primary dining rooms, kitchens, rooms with mains plumbing/toilets, rooms with no windows and/or rooms with entrances/exits to the outside are not usable as bedrooms and so cannot be counted for this purpose.
- 5.6 The potential use of rooms of bedrooms might also be assessed by comparing the size of the studies against the Nationally Described Space Standard definition of the size of room required to be considered a bedroom. Colleagues may also note that the studies also tend to be on the first floor, which tends to be the preferred location for a bedroom unless mobility needs dictate otherwise.
- 5.7 The following table sets out the mix as considered by officers with regard to the potential use of rooms as bedrooms, compared to the District-wide need referred to by policy SP01.

Bedrooms	Mix of open-market units required to mirror District-wide requirement <sup>2</sup>	Mix Proposed	Difference
1-bed	1	0	-1
2-bed	6	4	-2
3-bed	5	10	+5
4-bed +	5	4	-1

- 5.8 **This shows a discrepancy from the District-wide requirement and it is not clear how this discrepancy is justified.** A review of data from the 2021 Census shows that the Parish of Stradbroke has a level of under-occupation significantly in excess of the national average, with 82.7% of households under-

<sup>1</sup> See <https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/shma-part-2-update-2019>, table 4.4e, using the 2014-based results.

<sup>2</sup> Figure does not sum due to rounding.

occupying in Stradbroke compared to 81.6% of Mid Suffolk households or 68.8% of English households. With an ageing population, this suggests an opportunity to encourage downsizing with more smaller dwellings.

5.9 Policy STRAD3 of the made Stradbroke Neighbourhood Plan may also be relevant here, although it is noted that this policy does not distinguish between open market and affordable homes. Applying this policy would suggest that:

- At least 40% of the development (11.2 units, rounded up to 12 to achieve 'at least' 40%) to be one- or two-bed properties.
- Of these 12 units, at least 30% are to be one-bed dwellings. This equates to 4.

5.10 So the requirement for this scheme arising from this policy can be summarised as a minimum of four 1-bed properties and a minimum of eight two-bed properties. This mix is achieved.