

The Old Vicarage,  
Low Road,  
Fressingfield,  
Suffolk.  
IP215QL

12 June 2018

Dear Dr Poulter

**Re Fressingfield Applications 1432/17 (99 houses), 1449/17 (85 houses) and 1648/17 (24 houses)**

You may recall our meeting last year about multiple housing developments proposed in Fressingfield. These will, according to Suffolk County Council's estimates, increase household numbers by 57% if applications approved but not started, are included (3872/16 for 18 houses and Baptist Chapel and 4410/16 for 28 houses and scout headquarters). The many objections highlight numerous problems. However, there are two generic areas in particular where SAFE ([www.fressingfieldhousing.org.uk](http://www.fressingfieldhousing.org.uk)) has struggled to get satisfactory answers, despite the best efforts of our Councillors: highways and drainage. We would value your support in our discussions with SCC and MSDC as well as perhaps an approach to the Planning Minister on these generic issues, which must be faced by many villages across the constituency.

In Mid Suffolk, we are hampered by the lack of a Local Plan and by the fact that there is not a five-year supply of housing, so that all existing MSDC policies 'for the supply of housing' are deemed out of date. This makes the district very vulnerable to premature applications for over development – but also means that those processes that do exist to protect the area, must be transparent and rigorous.

**Highways** - Our engagement with SCC on highways has lacked transparency. I attach a SAFE paper about the Cumulative Transport Assessment (CTA) provided by the developers, which we felt was flawed. In our view, it fails properly to address road safety, pedestrians' needs, the needs of disabled people and access for emergency vehicles and uses the wrong type of data in reaching its conclusions, as detailed in the attached paper.

SCC have now recommended approval for applications 1432/17 and 1449/17 with some conditions which bear no relation to the points raised in our paper. There is to be a 14 day consultation on the 'mitigation measures' put forward by the developer, which is welcome. However, the assessment of the problems that these measures are designed to mitigate is inadequate, so the starting point for the measures is wrong. For example, despite an increase of 57% in vehicular and pedestrian traffic (including an extra 63 schoolchildren), SCC has concluded that road safety in the village will not be affected because there has been only one recorded injury in the area. Why is this history at a lower level of traffic relevant to judging the safety capacity of roads and footpaths after such traffic increases by 57%?

**Drainage** - The system of accountability for drainage is byzantine. The Environment Agency is responsible for river and sea flooding and pollution, SCC for surface water flood management and Anglian Water for foul drainage while the Internal Drainage Board covers flood risk from ordinary watercourses. Despite this plethora of statutory bodies set up to protect residents from flooding, none of them has been able to assist us in full as their responsibilities are split.

Crucially no cumulative flood impact assessment has been required of the impact of all developments despite well-chronicled problems of raw sewage polluting the village in heavy rain and regular flooding around the beck, which the Director of Public Health has referred to Public Health England. Such a cumulative assessment of the impact of multiple developments on flooding will be required in the proposed revised NPPF, but not in the current one. It is not clear who has discretion for requiring this currently, resulting in nobody doing so.

Finally, we would like to draw your attention to an anomaly in the legal framework for planning in relation to foul drainage. The Suffolk's Flood Risk Management Strategy notes: '*Currently, foul and surface water drainage from new developments can be connected to public sewers and Water and Sewerage Company has no powers to prevent new connections to its network, even if it believes it could cause flooding to customers.*' This right is triggered on the grant of full planning permission, even where – as in the case of

Fressingfield - Anglian Water has ample evidence of flooding from villagers who have excreta in their gardens from overflowing sewers, which have overflowed four times this year alone.

Please let us know if we can provide any further briefing on these matters. We would be happy to meet you to discuss how we can best collaborate with you in progressing these matters.

Yours sincerely,

Dr. John Castro - On behalf of SAFE

(Pam Castro, Dawn Cavilla, John Kelsall, Elizabeth Manero, Abi Maydon, Michael Miles, Trevor Orchard)