

CHILTON PARISH COUNCIL

Clerk: Dave Crimmin, Cragston, Sudbury Road, Newton, Sudbury, Suffolk CO10 0QH
Tel: 01787 375085 email: chiltonpc@btinternet.com

22nd March 2016

Development Management
Babergh District Council
Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Dear Mr Elvin

Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury | Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

The following are the objections of Chilton Parish Council to the above application for outline planning permission (with all matters reserved except for access).

The following definitions are used throughout these objections:

Chilton Parish Council:	hereafter CPC
Babergh District Council:	hereafter BDC
Suffolk County Council:	hereafter SCC
Amec Foster Wheeler:	hereafter Amec
The Application Site:	hereafter the Site or the proposed development
Section 106 agreement proposed to be entered into in relation to the Site:	hereafter Section 106 Agreement
Environmental Statement:	hereafter ES .

A substantial volume of information accompanied this application and we understand a second round of consultation is to follow. As the transport information supporting the application is not yet complete rather than comment piecemeal we do not comment on that information in these objections but will do so once the outstanding information has been received.

We comment on the various sections of this application and reserve the right to comment further separately on Ecology and the ES. As there has been a substantial volume of information we regret it has not been possible to deal in this submission with all our objections and submissions.

CHILTON PARISH COUNCIL

1 The role of SCC

- 1.1 We together with Great Waldingfield PC and Long Melford PC expressed our concerns to the then leader of SCC and the leader of BDC in our letter of 13 January 2015 about the way in which these parish councils were being involved as to the design and strategy relating to the proposed development. Our concerns remain about the way in which SCC have approached this planning application and we remain unclear as to their intent. CPC have willingly participated in the Place-shaping Group but we were unhappy with the way in which the Group functioned as explained in our letter of 13 January. Accordingly, reference to how SCC's engagement with this Group has shaped the masterplan are disappointing when only an "Illustrative masterplan" has been produced. Our concerns and dissatisfaction remains that this process has been used to constitute consultation with the community when throughout the process at no time did SCC make it clear that they were not intending to use the feedback of the parishes and consultees to inform a Masterplan to support the planning application but rather that only a bare outline application would be made. Our representatives on that Group were suspicious that this might occur but answers to our questions were not provided. We therefore consider that SCC have not properly complied with community consultation as the material gained from the discussion is only used to support an "Illustrative masterplan". As the applicant SCC is a local authority and not a commercial developer seeking to exploit land for maximum financial gain, we would expect this application to be conducted with more transparency about SCC's intentions. As an example, members of the Place-shaping Group were told that we would be consulted about the transport assessment and travel plan details **before** the application was made. That did not occur although now a meeting took place on 7 March 2016, some weeks after the actual application had been filed.
- 1.2 CPC record their disappointment also that SCC refused to contribute to the financial costs of their and other parish councils obtaining specialist advice on a number of technical areas such as traffic. CPC are considering instructing specialist advisers once all the information is complete and will file further submission.
- 1.3 We appreciate SCC are trying to realise financial gain from the Site but in doing so CPC submit they should take account of the views of the local community. We question whether this is the right way for SCC to conduct themselves as a local authority and request that BDC ensure that full detail is provided for this outline planning application.
- 1.4 SCC also has a conflict of interest in its position as landowner and quasi-developer seeking outline planning permission and as the executive dealing with highways, archaeological, ecological and other development aspects. Given those several roles its transparency in dealings is very important.

2 The outline application

- 2.1 CPC object to the above description of the development for which bare outline permission is sought as it is unspecific and general. It needs to be more detailed which is entirely consistent with it being an outline application. There is less information and detail in the outline application description above than there is in Policy CS4. Given that the application is supported only by an "Illustrative masterplan" SCC are creating a developer's charter which is considered by CPC to be unacceptable.

3 "Illustrative masterplan"

- 3.1 This application is deficient in that no Masterplan has been filed in support of this application as is required under policy CS4. This application is accompanied only by an "Illustrative Masterplan" for the development. There is no obligation on SCC or any developer to carry out the development in conformity with the "Illustrative Masterplan". Therefore there is no certainty about how this development will look and what could be put forward at reserved

CHILTON PARISH COUNCIL

matters stage could be completely different from what is said in the supporting documents for this outline application. A number of our parishioners, without specialist advice or knowledge of planning matters, have been misled by this application to believe that the "Illustrative masterplan" is what the development will consist of and look like.

- 3.2 Amec commented at the meeting on 7 March, in response to a question why their application was so unspecific, that having paid a fee of £125,000 it was now up to BDC to set out what they required from SCC and that the application could be controlled by the imposition of conditions. CPC consider it is preferable however that SCC should commit to a Masterplan, as required under CS4, containing sufficient detail and clarity to establish at least the land use and development mix; in particular to establish where the employment and housing areas will be and the mix, size, appearance and layout of those areas.
- 3.3 Accordingly CPC object that all matters are reserved except for access and consider that BDC should require as part of this outline application that SCC provide more detail and commit to:
- appearance;
 - layout;
 - scale; and
 - landscaping details

rather than all those matters being reserved for future development. Illustrative details and broad parameters for these matters are unacceptable.

4 The Environmental Statement

- 4.1 Accordingly because of "the illustrative details and broad parameters" there is a fundamental flaw in the accompanying ES as it bases its assessments only on the "illustrative mix" chosen by SCC. Therefore the predictions supporting this application e.g. as to traffic, levels of employment, housing mix, visual impact, drainage and noise are all estimates and uncertain. This in CPC's view does not constitute sustainable development and is contrary to BDC's policies CS4 and CS15.
- 4.2 Also SCC have failed in the ES to analyse the possible environmental impacts on the worst case basis. As far as we can tell the assessments have been done only on the basis of their suggested illustrations. Therefore in a differently constituted scheme the environmental impacts could be significantly more detrimental than the examples chosen to illustrate this application. This in CPC's view fails to conform with the required procedures under the Environmental Impact Assessment Regulations (England) 2011.

5 Viability

- 5.1 The viability assessment for the application appears to be an Affordable Housing Viability Statement (File B) from Deloitte's Real Estate dated 10 December 2015. That document states:

"The outline planning permission and masterplan enables a comprehensive development of homes, employment uses, community woodland, village centre in response to the requirements of the Babergh Core Strategy"

Deloitte states that their work to date shows there are

CHILTON PARISH COUNCIL

"There are viability challenges, particularly regarding what level of affordable housing is achievable and how the upfront infrastructure costs to release the employment land can be met once planning permission is in place."

5.2 CPC and other parish council have had concerns since the outset about the viability of the scheme. At the hearing before the Planning Inspector Deloittes and SCC assured him that the proposed development was viable. There is scant information provided as to viability in this application. In view of the above statement the clear inference is that the proposed scheme is not viable.

5.3 BDC policy CS19 Affordable Housing Supplemental Document (BDC 2014) requires 35% affordable housing provision. At page 42 of the Planning Statement Amec refer to the 35% affordable housing provision as *"unlikely to be achievable given the potential impact this could have on the viability of the proposed development"*. The proposed scheme therefore appears contrary to BDC policy CS19 and as viability evidence is required under BDC policy CS4 it also is contrary to that provision. Variables affecting viability are also referred to on page 42 of the planning statement including

"the

2 cost and timing for delivery key infrastructure alongside the proposed development;

3 cost of the upfront infrastructure involved in opening up access to the employment land;

4 cost of managing and maintaining open spaces, community woodland and other community facilities;

5 the delivery of homes as early as possible to generate revenue and profit which will help towards points 1, 2 and 3 ..."

5.4 SCC say that a detailed appraisal of viability will be available later. Full information as to viability should be provided in the second round on consultation as there is insufficient to date. It appears from the Transport assessment though that SCC and Amec are considering providing 15% of the residential units as affordable housing and 85% as private housing. CPC wonders therefore what is the test of viability which SCC and Amec are applying? Is it that of a commercial property developer seeking to maximise financial gain or that of a local authority to provide housing for local inhabitants.

6 Phasing of the development

6.1 CPC objects strongly to certain elements of the proposed phasing. All the phasing is predictive and uncertain - see *"approximately"*, *"it is likely"*, *"it is assumed"* and *"approximate uses"*. This development was originally intended to be a standalone *"garden town"* in a community woodland. CPC object very strongly to there only being initial landscaping and community woodland in phase 1. If permission for this development is to be granted by BDC there must be stringent conditions imposed on any planning permission, the new western access road off Springlands Way, west of Tesco, going through the employment area of the proposed development is essential from the start of the development before any residential homes are built. It need at the onset only be built to a *"haul road standard"*. All construction traffic should use this entrance while the Site is developed. To route construction traffic through Aubrey Drive and Reynolds for a number of years in order to construct the residential units while the Site is being developed is unacceptable.

6.2 The primary school nursery along with the village hall/community facilities need to be developed early in phase 1 rather than waiting until more than half the site is developed. We are advised by our District Councillors that schools in the Sudbury area are already

CHILTON PARISH COUNCIL

oversubscribed. The need to transport children from the development to local school should be kept to the minimum because that will also have an adverse impact on traffic. Further from our review of the supporting documents we have not found that the ES covers construction traffic levels or noise and impact on air quality. We consider this is a deficiency in the application and should be remedied in the second round.

6.3 Of particular concern to CPC is that the phasing envisaged by SCC could easily result that the phase 1 housing is built and the rest of the site is not built out, including the community facilities and playing pitches. So that what occurs in effect is an urban extension to Sudbury by 40% of the residential units being built and some employment at the western end of the site being built out. This would be the worst result.

6.4 We will deal with the traffic mitigation measures when we deal with the traffic assessment.

7 Employment

7.1 BDC policy is that development should be "jobs led". CPC object to the illustrative nature of the employment provisions. At present the illustrative masterplan provides for 61,650 m sq of employment floor space comprising 18% B1A and B uses, 35% B2 uses and 47% B8 uses. The material provides only an indicative footprint and does not fix location or layout. CPC consider this unacceptable. This indicative mix is used to support an alleged "*potential to provide up to approximate 2,125 jobs*".

7.2 Whilst not committing themselves to this mix of employment uses SCC nonetheless use this mix to base certain of their impact assessments on e.g. noise, traffic, visual impact. The layout, appearance and usage should be determined at this outline stage. We consider the B2 use is too high and heavy industry is incompatible with nearby residential development. We query the amount of floor space allocated to warehousing which is well known to be the lowest generator of employment. If outline permission were to be granted as sought by SCC with no specificity as to the extent of use as to the various use classes, as at present the only definition is of "*16.4 ha of employment land to include B1, B2 and B8*", on that basis, with such a wide unspecific definition, there could be 15.2 hectares of B2 development alone. Therefore CPC request BDC to ensure at outline stage that there is specificity about the mix of uses, their location and the layout of the area.

8 Housing

8.1 We consider that the development should conform to policy CS4 and provide for up to 1050 new dwellings. We do not agree that "approximately 1,050" new dwellings covers up to 1,100. There is no material supporting the increased numbers in the application. We query whether the indicative dwelling mix is accurate given that the population of Suffolk is ageing. SCC defer any provision for sheltered accommodation to a separate planning application on some future date. However if such is something which is actively envisaged now then it should be included in the outline application and the housing mix altered accordingly.

8.2 As presently proposed CPC consider that the outline application fails to comply with policy CS19 on affordable housing.

9 Transport and Travel Plan

9.1 As the material in support of this application on these issues are not complete we will defer our comments to a separate submission once we have had an opportunity of considering the full documentation.

CHILTON PARISH COUNCIL

10 Section 106 Agreement

- 10.1 The draft heads of terms relating to a future Section 106 Agreement need considerable work. Currently the heads of terms are deficient as there are several planning obligations missing e.g. a capital sum for the supply and installation of the community woodland. Policy CS4 provides for BDC to cooperate with CPC and other parish councils. We have already asked to be involved in the negotiations on the Section 106 Agreement. CPC considered it particularly important that there is a final form of Section 106 Agreement to go before any Planning Committee in consideration of this application for outline permission rather than the Section 106 being negotiated after planning permission has been granted since in such circumstances BDC are at a negotiating disadvantage.

11 The community facilities and the sport pitches

It is important to CPC that the community facilities are located within the Chilton parish boundary. There is no provision for this in the outline application and this should be remedied. With regard to the design of the village hall and the village green from the outset CPC have given feedback that this should be an integrated unit and not be separated by a busy road. The village green should be in front of the village hall rather than car parking. The Parish Council considers that the sport pitches should also be located closer to the village centre to assist its financial viability. CPC consider that the community facilities and the sport pavilion layout and location should be dealt with in the outline application and not left over for reserved matters when these facilities could be proposed to be located elsewhere. With regard to the sports pitches at least some of them should be located near the village hub otherwise CPC consider that people using them will not spend time in the village centre or make retail purchases. A village pub overlooking the village green and sport pitches would be preferable.

12 Drainage

- 12.1 The proposed drainage strategy is complicated and there are a number of constraints imposed on proposed development. The drainage strategy is "a *high level solution for accommodating the proposed development aspirations*". A combination of SuDS techniques would be encouraged such as:
- permeable paving in the residential zones;
 - sub-surface storage tanks in the employment zone;
 - swales and ditches; and
 - ponds to assist in attenuation.
- 12.2 "*Certain areas of the development could result in large quantities of silty runoff which needs to be filtered out to ensure that downstream receiving watercourses/sewers are not subjected to a build-up of such material*". There appears to have been discussions within SCC as to the appropriate drainage strategy. Amec and SCC recognise that "*Discussions with key stakeholders have been high level and preliminary only at this outline planning stage. Prior to constructing any new development, further liaison is recommended with the key stakeholders which in turn may lead to the need to carry out further survey work and investigation*".
- 12.3 CPC remains unconvinced that this preliminary drainage strategy is sufficient to cope with the topography and runoff from this Site. For the purposes of the outline application, before any permission is granted, CPC consider that SCC needs to provide further detailed information as earlier developers such as Redrow found that the existing sewerage system could not cope with the increased outflow that would be caused by the land use changing

CHILTON PARISH COUNCIL

from agricultural to more impermeable surfaces. Further, we do not consider this drainage strategy complies with the requirements of the Environmental Impact Assessment Regulations (England) 2011.

13 Ecology, Historic Sites and ES

13.1 We will file a separate submission on these aspects.

14 Conditions

14.1 When the sustainability and several other issues are resolved any grant of planning permission must include clear conditions that approval requires any subsequent reserved matters applications to be in conformity with the final form of the Chilton Woods Masterplan as it stands at the point at which any approval of permission was granted. The purpose of this is to ensure that mitigation measures remain relevant to the eventual development and not rendered ineffective by material changes in reserved matters application. This is the reason why CPC require further details as to appearance, layout and scale to be covered in the outline application.

Yours sincerely

A black rectangular redaction mark covering the signature of Dave Crimmin.

Dave Crimmin MILCM
Clerk, Chilton Parish Council

CHILTON PARISH COUNCIL

Clerk: Dave Crimmin, Cragston, Sudbury Road, Newton, Sudbury, Suffolk CO10 0QH
Tel: 01787 375085 email: chiltonpc@btinternet.com

4th July 2017

Development Management
Babergh District Council
Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Dear Mr Elvin

Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to **1,150 dwellings** (Use Class C3); **15ha** of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

The following are the objections of Chilton Parish Council to the above application for outline planning permission (with all matters reserved except for access).

Rather than file a further separate objection we have updated this letter (original dated 22nd March 2016) dealing with our previous objections to include our objections under the second consultation. Those objections are dealt with in separate paragraphs in a different font for ease of reference. We also deal with our objections to the transport and ecology.

The following definitions are used throughout these objections:

Chilton Parish Council:	hereafter CPC
Babergh District Council:	hereafter BDC
Suffolk County Council:	hereafter SCC
Amec Foster Wheeler:	hereafter Amec
Chilton Woods Place Shaping Group	hereafter CWPSG
The Application Site:	hereafter the Site or the proposed development
Section 106 agreement proposed to be entered into in relation to the Site:	hereafter Section 106 Agreement
Environmental Statement:	hereafter ES .

CHILTON PARISH COUNCIL

1 The role of SCC

- 1.1 We together with Great Waldingfield PC and Long Melford PC expressed our concerns to the then leader of SCC and the leader of BDC in our letter of 13 January 2015 about the way in which these parish councils were being involved as to the design and strategy relating to the proposed development. Our concerns remain about the way in which SCC have approached this planning application and we remain unclear as to their intent. CPC have willingly participated in the Place-shaping Group but we were unhappy with the way in which the Group functioned as explained in our letter of 13 January. Accordingly, reference to how SCC's engagement with this Group has shaped the masterplan are disappointing when only an "illustrative masterplan" has been produced. Our concerns and dissatisfaction remains that this process has been used to constitute consultation with the community when throughout the process at no time did SCC make it clear that they were not intending to use the feedback of the parishes and consultees to inform a Masterplan to support the planning application but rather that only a bare outline application would be made. Our representatives on that Group were suspicious that this might occur but answers to our questions were not provided. We therefore consider that SCC have not properly complied with community consultation as the material gained from the discussion is only used to support an "illustrative masterplan". As the applicant SCC is a local authority and not a commercial developer seeking to exploit land for maximum financial gain, we would expect this application to be conducted with more transparency about SCC's intentions. As an example, members of the Place-shaping Group were told that we would be consulted about the transport assessment and travel plan details before the application was made. That did not occur although now a meeting took place on 7 March 2016, some weeks after the actual application had been filed.
- 1.2 CPC record their disappointment also that SCC refused to contribute to the financial costs of their and other parish councils obtaining specialist advice on a number of technical areas such as traffic. CPC are considering instructing specialist advisers once all the information is complete and will file further submission.
- 1.3 We appreciate SCC are trying to realise financial gain from the Site but in doing so CPC submit they should take account of the views of the local community. We question whether this is the right way for SCC to conduct themselves as a local authority and request that BDC ensure that full detail is provided for this outline planning application.
- 1.4 SCC also has a conflict of interest in its position as landowner and quasi-developer seeking outline planning permission and as the executive dealing with highways, archaeological, ecological and other development aspects. Given those several roles its transparency in dealings is very important.
- 1.5 We remain very dissatisfied with the way in which SCC has conducted this application. It is regrettable that SCC have ignored or failed to take into account our concerns and those of other objectors in this second consultation. CPC appreciated having the opportunity to meet with SCC and their advisers to explain further our concerns but are disappointed that those concerns have still not been taken into account. Further, despite us and CWPSG being told by SCC advisers that there would be further general meetings to discuss the scheme in particular traffic / transport issues, none have taken place.
- 1.6 Policy CS4 provides that "BDC is committed to working co-operatively with partners to bring forward and deliver the CW scheme in a timely way. This will include joint action to overcome a potential key development issue around electrical power supply in the Sudbury area and its likely impact on development viability." As it currently stands the

CHILTON PARISH COUNCIL

application materials contains no evidence about the action taken to overcome the development issue around the electrical power supply and its impact on development viability.

2 The outline application

- 2.1 CPC object to the above description of the development for which bare outline permission is sought as it is unspecific and general. It needs to be more detailed which is entirely consistent with it being an outline application. There is less information and detail in the outline application description above than there is in Policy CS4. Given that the application is supported only by an "illustrative masterplan" SCC are creating a developer's charter which is considered by CPC to be unacceptable.

3 "Illustrative masterplan"

- 3.1 This application is deficient in that no Masterplan has been filed in support of this application as is required under policy CS4. This application is accompanied only by an "Illustrative Masterplan" for the development. There is no obligation on SCC or any developer to carry out the development in conformity with the "Illustrative Masterplan". Therefore, there is no certainty about how this development will look and what could be put forward at reserved matters stage could be completely different from what is said in the supporting documents for this outline application. A number of our parishioners, without specialist advice or knowledge of planning matters, have been misled by this application to believe that the "illustrative masterplan" is what the development will consist of and look like.

- 3.2 Amec commented at the meeting on 7th March 2016, in response to a question why their application was so unspecific, that having paid a fee of £125,000 it was now up to BDC to set out what they required from SCC and that the application could be controlled by the imposition of conditions. CPC consider it is preferable however that SCC should commit to a Masterplan, as required under CS4, containing sufficient detail and clarity to establish at least the land use and development mix, in particular to establish where the employment and housing areas will be and the mix, size, appearance and layout of those areas.

- 3.3 Accordingly, CPC object that all matters are reserved except for access and consider that BDC should require as part of this outline application that SCC provide more detail and commit to:

- appearance;
- layout;
- scale; and
- landscaping details

rather than all those matters being reserved for future development. Illustrative details and broad parameters for these matters are unacceptable.

- 3.4 Our objections to the lack of a masterplan are maintained. The revised illustrative master plan is of no value as it remains illustrative. CPC's objections therefore remain as stated above. The applicant now seeks approval for land use parameters. This is being submitted without any further consultation with the Parish Councils affected or CWPSG. CPC object to the key land use parameters as that should not be approved

CHILTON PARISH COUNCIL

without there being an agreed masterplan. The applicant is seeking to avoid an obligation which is clearly imposed by CS4. BDC should not allow this to happen.

4 The Environmental Statement

- 4.1 Accordingly, because of "the illustrative details and broad parameters" there is a fundamental flaw in the accompanying ES as it bases its assessments only on the "illustrative mix" chosen by SCC. Therefore, the predictions supporting this application e.g. as to traffic, levels of employment, housing mix, visual impact, drainage and noise are all estimates and uncertain. This in CPC's view does not constitute sustainable development and is contrary to BDC's policies CS4 and CS15.
- 4.2 Also, SCC have failed in the ES to analyse the possible environmental impacts on the worst case basis. As far as we can tell the assessments have been done only on the basis of their suggested illustrations. Therefore, in a differently constituted scheme the environmental impacts could be significantly more detrimental than the examples chosen to illustrate this application. This in CPC's view fails to conform with the required procedures under the Environmental Impact Assessment Regulations (England) 2011.
- 4.3 Our objections remain as above.

5 Viability

- 5.1 The viability assessment for the application appears to be an Affordable Housing Viability Statement (File B) from Deloitte's Real Estate dated 10 December 2015. That document states:

"The outline planning permission and masterplan enables a comprehensive development of homes, employment uses, community woodland, village centre in response to the requirements of the Babergh Core Strategy"

Deloitte states that their work to date shows:

"There are viability challenges, particularly regarding what level of affordable housing is achievable and how the upfront infrastructure costs to release the employment land can be met once planning permission is in place."

- 5.2 CPC and other parish council have had concerns since the outset about the viability of the scheme. At the hearing before the Planning Inspector Deloitte's and SCC assured him that the proposed development was viable. There is scant information provided as to viability in this application. In view of the above statement the clear inference is that the proposed scheme is not viable.
- 5.3 BDC policy CS19 Affordable Housing Supplemental Document (BDC 2014) requires 35% affordable housing provision. At page 42 of the Planning Statement Amec refer to the 35% affordable housing provision as "*unlikely to be achievable given the potential impact this could have on the viability of the proposed development*". The proposed scheme therefore appears contrary to BDC policy CS19 and as viability evidence is required under BDC policy CS4 it also is contrary to that provision. Variables affecting viability are also referred to on page 42 of the planning statement including

"the

- 2 cost and timing for delivery key infrastructure alongside the proposed development;

CHILTON PARISH COUNCIL

- 3 cost of the upfront infrastructure involved in opening up access to the employment land;
 - 4 cost of managing and maintaining open spaces, community woodland and other community facilities;
 - 5 the delivery of homes as early as possible to generate revenue and profit which will help towards points 1, 2 and 3 ..."
- 5.4 No detailed appraisal or any additional information has been provided as to viability despite SCC statement that it would be provided and requests for this being made. Evidence as to viability is crucial to this application. The applicant's failure to produce evidence supporting viability reinforces our view that the scheme is not viable. Two developers have already pulled out because of non-viability. Before this application proceeds to the BDC planning committee detailed information as to viability MUST be produced as required under BDC policy CS4. The proposed scheme still appears contrary to BDC policy CS 19 as it still appears that 85% of the housing units will be private housing and 15% affordable housing.

6 Phasing of the development

- 6.1 CPC objects strongly to certain elements of the proposed phasing. All the phasing is predictive and uncertain - see "*approximately*", "*it is likely*", "*it is assumed*" and "*approximate uses*". This development was originally intended to be a standalone "*garden town*" in a community woodland. CPC object very strongly to there only being initial landscaping and community woodland in phase 1. The access arrangements for the construction of the phases have not been clarified within the application. However, it is welcomed that within the indicative construction phasing for the residential and employment areas, contained in the ES Addendum, that the Western Access road will be completed in Phase 1. BDC must make the Western Access road the access for all construction traffic for the duration of the development and ensure that the Construction Management Plan enforces the requirement for all HGV traffic to be routed directly to and from Bury St Edmunds via the A134. To route construction traffic through Aubrey Drive and Reynolds Way from 2019 to 2035 in order to construct the residential units while the Site is being developed is unacceptable. If outline planning permission is to be granted then a planning condition needs to be imposed which requires that the Western Access road is built before any other development work starts and that all construction traffic must use the western access road only.
- 6.2 The primary school nursery along with the village hall/community facilities need to be developed early in phase 1 rather than waiting until more than half the site is developed. We are advised by our District Councillors that schools in the Sudbury area are already oversubscribed. The need to transport children from the development to local school should be kept to the minimum because that will also have an adverse impact on traffic. Further from our review of the supporting documents we have not found that the ES covers construction traffic levels or noise and impact on air quality. We consider this is a deficiency in the application and should be remedied.
- 6.3 Of particular concern to CPC is that the phasing envisaged by SCC could easily result that the phase 1 housing is built and the rest of the site is not built out, including the community facilities and playing pitches. So that what occurs in effect is an urban extension to Sudbury

CHILTON PARISH COUNCIL

by 40% of the residential units being built and some employment at the western end of the site being built out. This would be the worst result.

6.4 We will deal with the traffic mitigation measures when we deal with the traffic assessment.

7 Employment

7.1 BDC policy is that development should be "jobs led". CPC object to the illustrative nature of the employment provisions. At present the illustrative masterplan provides for 61,650 m sq of employment floor space comprising 18% B1A and B uses, 35% B2 uses and 47% B8 uses. The material provides only an indicative footprint and does not fix location or layout. CPC consider this unacceptable. This indicative mix is used to support an alleged "*potential to provide up to approximate 2,125 jobs*". Due to the uncertainty of construction and occupation and because warehousing and storage as a use type provide low levels of employment for the size of the site utilised we submit that the claim is for job creation should be treated with caution and not accepted at face value.

7.2 Whilst not committing themselves to this mix of employment uses SCC nonetheless use this mix to base certain of their impact assessments on e.g. noise, traffic, visual impact. The layout, appearance and usage should be determined at this outline stage. We consider the B2 use is too high and heavy industry is incompatible with nearby residential development. We query the amount of floor space allocated to warehousing which is well known to be the lowest generator of employment. If outline permission were to be granted as sought by SCC with no specificity as to the extent of use as to the various use classes, as at present the only definition is of "*16.4 ha of employment land to include B1, B2 and B8*", on that basis, with such a wide unspecific definition, there could be 15.2 hectares of B2 development alone. Therefore CPC request BDC to ensure at outline stage that there is specificity about the mix of uses, their location and the layout of the area.

7.3 SCC have not revised their proposal for the western employment area except to reduce it to accommodate Heritage England objections. CPC remain opposed to the proposed general allocation of land usage at this time particularly to the B2 and B8 allocations because as currently worded the whole area could be allocated to B2 or B8. CPC agree and adopt Councillor Frank Lawrenson's points made in his letter of 22nd June 2017 about the proposed uses being inconsistent with BDC and SCC views as expressed in the Suffolk Growth Strategy. As currently envisaged the proposed construction period is very long but there is no element of future proofing in these proposals which there should be.

7.4 Such a large percentage of land allocated to warehousing storage and distribution seems also inconsistent with paragraph 4.31 of the Babergh Local Plan Alteration Number 2 Policy EM08, states although proposals for warehousing, storage and distribution will be permitted at General Employment areas this is to be:

"Subject to the acceptability of the location and characteristics of these sites "and "proposals that take up an excessive amount of land or are more appropriately located elsewhere, for example reports of close it to trunk roads, will be refused".

8 Housing

8.1 We consider that the development should conform to policy CS4 and provide for up to 1050 new dwellings. We do not agree that "approximately 1,050" new dwellings covers up to

CHILTON PARISH COUNCIL

1,150. There is no material supporting the increased numbers in the application. We query whether the indicative dwelling mix is accurate given that the population of Suffolk is ageing. SCC defer any provision for sheltered accommodation to a separate planning application on some future date. However, if such is something which is actively envisaged now then it should be included in the outline application and the housing mix altered accordingly.

8.2 As presently proposed CPC consider that the outline application fails to comply with policy CS19 on affordable housing.

8.3 There is no justification or explanation for the increase in housing units by a further 50. CPC object to the increased number. Historic England did not propose an increase in housing units.

9 Transport and Travel Plan

9.1 In CPC's first response to the Transport and Travel Plan on the 22nd March 2016, it concluded that *"As the material in support of this application on these issues are not complete we will defer our comments to a separate submission once we have had an opportunity of considering the full documentation."*

9.2 On the 8th April 2016 SCC, as the Highways Authority, submitted its response to the Transport Assessment which also included a Technical Note TA01 from its consultant AECOM dated 16th March 2016, which provided technical comments on the TA and summarised the note as follows:

"This note provides initial observations on the December 2015 TA produced by Amec Foster Wheeler in support of the Chilton Woods development. The note identifies a number of key areas of concern, information requirements and areas subject to further review:

- Use of alternative residential trip rates;*
- Inconsistencies and errors in the development of the flow diagrams provided;*
- Requirement to provide raw 2015 traffic survey data;*
- Requirement to provide AutoCAD plans of access and junction improvements;*
- Provision of relevant swept path analysis;*
- Provision of relevant LINSIG models; and*
- Concerns relating to the suitability of the proposed junction mitigation proposals based on initial overview.*

This is not an exhaustive list and will be subject to further discussions with SCC officers, in particular relating to the phasing strategy and triggers, and further analysis based on the requested additional information to be provided by the applicant."

CHILTON PARISH COUNCIL

- 9.3 On the 27th June 2017, one day following the close of the public consultation on the planning application, SCC Highways Authority submitted their 2nd response to the Transport Assessment in which they stated:

"The issues raised by our consultants, AECOM (in March 2016), have **been partially covered** by additional information considering the mitigation in more detail, in further Technical Notes and by an updated analysis of the accident data. Discrepancies in the trip rates **are unlikely to result in a significant change** to the traffic effects on the local highway network. Some issues with the Technical Notes have been considered in detail but it is concluded that **they provide a reasonable analysis of the capacity of the proposed mitigation**. There is **no separate consideration of the safety of the proposed mitigation** but this issue will be dealt with by the detailed design process. The applicant has stated that Stage 1 Road Safety Audits will be provided before the date of the committee meeting."

- 9.4 CPC consider that this response falls below what should be expected from the Highways Authority when reviewing a Transport Assessment for a development of this scale. The Transport Assessment baseline testing was agreed as 2024 when it was envisaged that the development would commence in 2016. However, with Amec now proposing the start of development in 2019 and being complete by 2035, the 2024 baseline testing is not acceptable as it does not comply with Department for Transport 'Guidance for Transport Assessment 2007'.

- 9.5 This application is to determine the access requirements for the construction traffic and the subsequent residential and employment traffic of up to 1150 dwellings and 15ha of employment development on the Chilton Woods site. For the Transport Assessment and Technical Notes not to have sufficient detail for the Highways Authority consultant AECOM to provide an update on its concerns of the 16th March 2016 is disturbing. It leaves the community around the proposed development site with little confidence in the Transport Assessment proposals provided to date.

- 9.6 To expand further on the Transport Assessment, at a meeting the applicant held with County, District, Town and Parish councillors on the 7th March 2016 to discuss transport issues with the proposal, Amec promised to hold a further meeting with the group to discuss all the issues raised. To date, this promise has not been fulfilled.

- 9.7 CPC still consider that the material in support of this application on the Transport and Travel Plan is not complete and CPC will defer its comments to a separate submission once the councillors have had the opportunity of considering the full response from SCC Highways Authority and its consultants AECOM.

10 Section 106 Agreement

- 10.1 The draft heads of terms relating to a future Section 106 Agreement need considerable work. Currently the heads of terms are deficient as there are several planning obligations missing e.g. a capital sum for the supply and installation of the community woodland. Policy CS4 provides for BDC to cooperate with CPC and other parish councils. We have already asked to be involved in the negotiations on the Section 106 Agreement. CPC considered it particularly important that there is a final form of Section 106 Agreement to go before any

CHILTON PARISH COUNCIL

Planning Committee in consideration of this application for outline permission rather than the Section 106 being negotiated after planning permission has been granted since in such circumstances BDC are at a negotiating disadvantage.

10.2 As the parish council most affected, CPC is frankly aggrieved that there has been no consultation or liaison with us about the proposed Section 106 provisions. CPC regard this as a continuing breach by SCC to conform with their duty to cooperate under CS4. Indeed, another failing is that SCC did not even provide the information about the Section 106 proposals with the revised application but instead chose to provide it only some nine days before the consultation period closed. This has the detrimental effect that interested parties would only have a limited time to consider it and those who had already responded may not have seen it. Mr McManus's letter of 15 June on behalf of SCC is seriously deficient in that it fails to require any financial provision by way of Section 106 funding for any of following:

- Community woodland and green landscaping
- The Community Centre and the community facilities generally
- The sports pavilion
- The sports pitches
- The children's play areas
- Mitigation measures for the historic environment;
- Ecological mitigation measures.

Section 106 provision must be made for the above listed facilities in particular the community woodland and the Community Centre otherwise the proposed development will not conform to local or national planning policy. CPC fear that otherwise this application will result in a development in Chilton but without the "Woods" nor any of the facilities which were intended to make it a standalone integrated community. Unless appropriate Section 106 obligations are imposed it is obvious any future developer will not want to fund these two crucial features. It is becoming increasingly clear to us that as the proposed development is apparently not viable SCC now appear to want to develop an urban housing extension to Sudbury of approximately 500 houses with no investment in infrastructure.

11 The community facilities and the sport pitches

11.1 It is important to CPC that the community facilities are located within the Chilton parish boundary. There is no provision for this in the outline application and this should be remedied. With regard to the design of the village hall and the village green from the outset CPC have given feedback that this should be an integrated unit and not be separated by a busy road. The village green should be in front of the village hall rather than car parking. The Parish Council maintains that the sports pavilion and sport pitches should also be located closer to the village centre to assist its financial viability, not where located on the illustrative master plan or the land use parameters map. CPC consider that the community facilities and the sport pavilion layout and location should be dealt with in the outline application and not left over for reserved matters when these facilities could be proposed to be located elsewhere. With regard to the sports pitches at least some of them should be located near the village

CHILTON PARISH COUNCIL

hub otherwise CPC consider that people using them will not spend time in the village centre or make retail purchases. A village pub overlooking the village green and sport pitches would be preferable. It is regrettable that SCC continued to ignore the wishes of the community and to locate the sports pavilion and the sports pitches elsewhere without any cogent justification for their proposed location.

12 Drainage

- 12.1 The proposed drainage strategy is complicated and there are a number of constraints imposed on proposed development. The drainage strategy is "a *high level solution for accommodating the proposed development aspirations*". A combination of SuDS techniques would be encouraged such as:
- permeable paving in the residential zones;
 - sub-surface storage tanks in the employment zone;
 - swales and ditches; and
 - ponds to assist in attenuation.
- 12.2 "*Certain areas of the development could result in large quantities of silty runoff which needs to be filtered out to ensure that downstream receiving watercourses/sewers are not subjected to a build-up of such material*". There appears to have been discussions within SCC as to the appropriate drainage strategy. Amec and SCC recognise that "*Discussions with key stakeholders have been high level and preliminary only at this outline planning stage. Prior to constructing any new development, further liaison is recommended with the key stakeholders which in turn may lead to the need to carry out further survey work and investigation*".
- 12.3 CPC remains unconvinced that this preliminary drainage strategy is sufficient to cope with the topography and runoff from this Site. For the purposes of the outline application, before any permission is granted, CPC consider that SCC needs to provide further detailed information as earlier developers such as Redrow found that the existing sewerage system could not cope with the increased outflow that would be caused by the land use changing from agricultural to more impermeable surfaces. Further, we do not consider this drainage strategy complies with the requirements of the Environmental Impact Assessment Regulations (England) 2011.
- 12.4 SCC advisers have revised the drainage strategy in the light of EA revised climate change allowances. However, that drainage strategy is still based on the masterplan which in AMEC own words "*is in any event in outline and illustrative*" and "*based on a number of assumptions and we know that a detailed drainage strategy will need to be in place prior to future applications for reserved matters to be dealt with by a planning condition (s).*"
- 12.5 The drainage of the site is an important issue and affects its viability. To have such an important issue again based on a number of assumptions is a fundamental flaw in this application.
- 12.6 The Ministerial Written Statement (MWS) made by the then Secretary of State for Communities and Local Government on 18 December 2014 provided that when considering a major development (of 10 dwellings or more) sustainable drainage systems should be provided unless demonstrated to be inappropriate. Further the MWS also provides that, in considering planning applications:

CHILTON PARISH COUNCIL

"local planning authority should consult the relevant lead local flood authority on the management of surface water, satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate"

- 12.7 These requirements were effective from 6 April 2015. CPC submit that in the light of the vague nature of the current drainage strategy BDC as the LPA are not able to satisfy themselves as to the appropriateness of this proposed drainage strategy for this development and so outline permission should be refused. To date there are no clear arrangements in place for ongoing maintenance over the lifetime of the development. Further whilst in paragraph 3.9 of the drainage strategy SCC recognise that for the ongoing maintenance of any SuDs either itself, Anglian Water or BDC will adopt (part or in combination). In such case "the developer will need to pay commuted sums for SuDs maintenance as part of the section 106 agreement." However, the letter from SCC (McManus 15 June 2017) dealing with Section 106 obligations does not provide for a Section 106 obligation for drainage nor is there a calculation of a commuted sum. The maintenance of SuDs is important to the effectiveness of any drainage system.

13 Ecology, Historic Sites and ES

13.1 Ecology

CPC referred to Suffolk Wildlife Trust letter of 23 June 2016 where they require planning conditions to be imposed with approved landscaping plans and mitigation matters which need to be secured. SCC letter of 15th June makes no provision for Section 106 funding for these elements see page 8 para 8 but leaves this to BDC. If outline planning permission is to be granted BDC needs therefore to ensure that there is adequate condition imposed and sufficient Section 106 funding is provided for these measures.

- 13.2 CPC also object to the way in which the green spaces and community woodland areas are allocated in the illustrative masterplan.

13.3 The historic environment.

CPC comment on the harm to Chilton Hall and the Registered Park and Garden as both are located within our parish. The Registered Park and Garden is one of only five such gardens in Suffolk. The Registered Park and Garden is listed in both the national register and in the local Suffolk list. We refer to the addendum to the environmental statement dated May 2017 recently filed by AFW and in particular to Appendix A: Technical Note: Historic Environment at page 3 section 3.

Paragraph 126 of the National Planning and Policy Framework provides that

CHILTON PARISH COUNCIL

"Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats... And that local planning authorities should take into account:

- 1. The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*
- 2. the wider social, cultural, economic and environmental benefits of conservation of the historic environment can bring;*
- 3. the desirability of new development making a positive contribution to local character and distinctiveness;*
- 4. opportunities to draw on the contribution made by the historic environment to the character of a place."*

Policies CP14, 15, 16 and 17 are all of relevance in relation to paragraph 126 above and of importance in relation to the illustrative masterplan. CN15 refers to preserving and enhancing the character of registered parks and gardens. Historic England in their letter of 10 February 2016 expressed concerns about the setting of the Registered Park and Gardens being adversely affected. CPC agree with Historic England that this application falls short of the desire to "sustaining and enhancing the significance of heritage assets and that the illustrative master plan does not consider fully the "positive contribution to conservation of heritage assets can make to sustainable communities."

AFW state that the existing tree screening will remain in place but as SCC do not own the land on which the existing tree screening along Waldingfield Road is situated they are not in a position to commit to this. The existing tree screening along Waldingfield Road is already thin and porous especially in winter. We consider it needs to be strengthened.

The land known locally as "Birdland", which used to be included in the CW application but no longer is, is we understand currently in pre-consultation discussions about its own planning application for housing. However, CPC has no information about it.

Also, permission B/16/01406 has recently been granted by BDC for five houses at Chilton Grove which property is situated opposite the Registered Park and Garden and the entrance drive to Chilton Hall.

CPC understand also that it is planned to develop the land adjoining the Birdland land, currently being an orchard, also for housing. We have no information about that application either.

As these applications are being brought forward by applicants other than SCC it is obviously sensible that these applications should not be considered piecemeal and separately but they should be considered together with this application so that the

CHILTON PARISH COUNCIL

effect on local residents and parishioners, the traffic impacts and the natural and historic environment is in total known and evaluated properly.

Accordingly, a planning condition and Section 106 funding for additional landscaping and screening is required for the protection of the Registered Park and Garden.

14 Essential pre-requisites to a fair consideration of this application

14.1 BDC cannot give proper consideration to the application, nor arrive at a safe determination of its acceptability, unless Members of the Committee have before them, supported by clear advice of Officers, a proposal which is accompanied by the following documents, which have been in the public domain and made available for detailed scrutiny and consideration by interested parties:

- A comprehensive set of proposed planning conditions regulating the development; and
- Detailed Heads of Terms spelling out the required Section 106 planning obligations.

14.2 The very outline nature of this application, devoid of much content (other than material which illustrative in its status), combined with the assumed build-out period, which on the Applicant's own assumption is with a start in 2016 (sic), and completion by 2031, reinforces the importance of this point.

14.3 It would be irresponsible for the planning authority to reach a determination in this case without those matters having been covered comprehensively and with great care.

15 The legal obligation to provide relevant Section 106 and Section 278 material

15.1 In this context, it is appropriate to remind BDC and the Applicant of the legal obligation contained in Article 40 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, which imposes a duty on each local planning authority in the following terms:

3) Part 1 of the register [of planning applications] must contain in respect of each application and any application for approval of reserved matters made in respect of an outline planning permission granted on such an application, made or sent to the local planning register authority and not finally disposed of...

b) a copy (which may be photographic or in electronic form) of any planning obligation or Section 278 agreement proposed or entered into in connection with the application.

15.2 If no such drafts of proposed obligations or Section 278 agreements is yet available, CPC formally requests that full unredacted copies of each version of such draft be made available to it forthwith on their presentation to the planning authority.

CHILTON PARISH COUNCIL

15.3 It is self-evident that this development proposal will have a huge impact on the immediate environment and surrounding area. It quite simply will not do for the Local Planning Authority and the County Council (which doubles up as the landowner and applicant) to seek to negotiate and conclude these arrangements behind closed doors, when at its most basic the planning system is required to function in the public interest on behalf of those most substantially affected by the development.

16 The risk of appearance of bias

16.1 The fact that SCC is both landowner and highway authority, and stands to benefit financially to a significant extent if this development is permitted to proceed, should of course cause the planning authority and the applicant to make every effort to ensure that there is no appearance or perception of bias or unfairness in the decision-making process.

16.2 CPC suggests that this would cause both the applicant and BDC to be at pains to demonstrate that every opportunity has been provided to interested parties, including this Parish Council, to engage fully in the substantive content of the development proposal.

16.3 Without full participative involvement in the proposed planning conditions and planning obligations debates, we invite both applicant and planning authority to indicate how they can demonstrate that this has been adequately done.

17 Adequacy of the substantive planning application content

17.1 Having considered the full set of application materials, the Parish Council observes that this is an application in such outline and illustrative form, devoid of much specific content, as to pose questions and invite scrutiny on whether a safe determination can be made at all. Indeed, on a fair reading of the application materials it is fair to pose the question whether this application is in essence an application for permission in a more detailed outline application than is proposed here remains the only appropriate procedure.

17.2 Because the Environmental Impact Assessment undertaken is parasitic on the illustrative substantive content of the application, it follows that the EIA material submitted is itself in places of questionable value and appears to us to be in need of being supplemented by additional content.

17.3 This ties back to the point made earlier about the imperative of fully scoped out and consulted upon planning conditions and obligations.

18 Section 106 obligations to benefit the Parish Council

18.1 Because the Chilton Woods site is allocated a strategic site in policy, and is for that reason zero-rated for CIL, the mitigation of impacts resulting from the scheme must necessarily be addressed by means of Section 106 planning obligations.

CHILTON PARISH COUNCIL

18.2 As such, by virtue of CIL Reg 122(2) a planning obligation made in respect of Chilton Woods:

may only constitute a reason for granting planning permission for the development if the obligation is-

1. necessary to make the development acceptable in planning terms;
2. directly related to the development; and
3. fairly and reasonably related in scale and kind to the development.

18.3 There are a number of mitigations considered to be of critical importance to the Parish of Chilton which are considered to fulfil all three of those requirements, with demonstrable ease, and which must accordingly be provided for in full in any Deed of Planning Obligations given by the landowner and binding on all successors in title. In particular, we draw attention to the following:

- A Village Hall for the Parish
- Funding for Communities Facilities
- Funding for the community woodland and green spaces
- Sports Pitches, and funding for their subsequent maintenance and upkeep.

18.4 The correspondence passing between the Applicant, its consultants, and the planning authority covers a range of issues proposed to be encompassed in Section 106 obligations, but is devoid of any (or any sufficient) indication of what is being proposed for the benefit of the Parish. In light of the comments made above, this is highly regrettable. The local community is being asked to pay a very high price indeed if it is to accommodate development on anything approaching this scale. It is also notable that Appendix A to the Planning Statement submitted with the application in December 2015 indeed makes reference to (inter alia) contributions for the provision of a Village Hall and for its maintenance; the provision of sports recreation and pavilion facilities and other features to benefit to immediate locality. The Applicant consultants appear to take the view that benefits offered to the local Parish can be omitted or reduced to a minimum, insofar as one can infer what is being offered from the exchanges of correspondence available in the public domain. The Applicant must be called upon to give a full account of its position here.

19 Chilton Parish Council as a signatory to Section 106 planning obligations

19.1 CPC formally requests that it be offered a place at the negotiating table to ensure that it is permitted to play a full part in settling and concluding the Section 106 planning obligations. This would minimise the risk of the planning authority and the applicant falling into legal error through the inadequacy of public consultation, the insufficiency of engagement with the local community and other circumstances such as may give rise to legal vulnerability.

CHILTON PARISH COUNCIL

- 19.2 CPC will expect that the belts of strategic planting and green spaces which are plainly considered, even on the wholly inadequate application materials, to be necessary to make the development acceptable in planning terms, be transferred to the Parish Council together with commuted maintenance payments, in order to ensure that the local community is in a position to take control of the maintenance of these areas.
- 19.3 There are quite simply too many examples of developments which at application stage portray a vision of utopian benefits which, through the passage of time, the evolution of thinking, and varying levels of willingness to see through on promises, lead to an end result which falls lamentably short of the vision portrayed in the application.
- 19.4 That must not be allowed to happen here. The only way in which the County Council can assure the Parish of this will be to ensure that the relevant land is given over to the control of the Parish, and sufficiently funded far into the future.
- 20 For the reasons set out above, CPC object to the proposed development and ask the Planning Committee to refuse consent for the outline application.**

Yours sincerely

A black rectangular redaction box covering the signature of Dave Crimmin.

Dave Crimmin MILCM
Clerk, Chilton Parish Council

SUDBURY TOWN COUNCIL PLANNING AND DEVELOPMENT COMMITTEE MEETING

MONDAY 14TH MARCH 2016

Agenda Item 6

To discuss planning application B/15/01718, Chilton Woods Development.

Mrs J Osborne (chairman) discussed the outline application and the access statement.

A slide presentation then took place.

Following the previous consultation on the Master Plan last year the Town Council welcomed a Master Plan but did raise concerns about the level of increased traffic in Sudbury and the impact that this will have. The mitigation proposals outlined in the Traffic Impact Assessment are welcomed and the Town Council's comments are outlined in this response. However, our concerns on the unacceptable level of traffic movement in and out of the town continue and we feel that this development highlights a further need for a By-Pass.

The exit and entrance to the Chilton Woods Development was discussed and the following comments were made by the committee members.

Junction 4 Acton Lane/ A134 Springlands Way

Access onto Springlands Way will be exacerbated for existing access roads, i.e. First and Second Avenue by the proposed traffic lights.

Junction 5 B115 Waldingfield Road/Church Field Road/Access to Homebase/B115 /Aubrey Drive

We are pleased to see the improved roundabout, but still have concerns about the impact on resident's amenity at Aubrey Drive and Reynolds Road.

Junction 6 B115 Northern Road A134 Springlands Way

Reducing the size of the roundabout and introducing slip roads should ease the traffic flow.

The Council feels that pressure should be put on commercial lorries to ensure they use the spine road which should be cut off from the housing area. Access to the housing area will be allowed for cars, pedestrians and bicycles only.

Junction 7 Northern Road A134/ Shawlands Avenue/ Newton Road

The mitigation plan is an improvement on the existing plan.

Junction 8b A131 Girling Street/A131 Melford Road/A131 Gainsborough Road

We have concerns as to how HGV's coming from Gainsborough Road around the Masonic Hall will remain in the right hand lane going into Girling Street. Has the proposal of the bus station been taken into account during this mitigation. We feel the proposed mitigation will not be effective.

Waldingfield Road/East Street.

Sudbury Town Council would propose mitigation to control traffic coming down Waldingfield Road into East Street and to include restriction on HGV's using East Street, apart from delivery vehicles and buses. Measures to restrict delivery times to businesses in East Street, and would like to see the traffic lights synchronized to enable good flow of traffic. It may be worth considering a 106 contribution to help mitigate traffic problems in this area.

Junction 12b A131 Gainsborough Street/A131 Stour Street/A131 Gregory Street.

This would improve the flow of traffic but would be extremely hazardous for pedestrians.

FURTHER COMMENTS RAISED

- Risk of flooding. SUDs will be part of the Plan but the committee feels that the drainage measures will be insufficient to cope with the large amount of run off from this site, which is high above Sudbury and which will direct all its run off downwards into the town. The system is antiquated and has outgrown its current usage. This will result in flooding in East Street. This is an area where floods are a frequent occurrence.
- We know from discussions with Anglian Water Services (AWS) that the foul drainage network (between the site and the receiving Sudbury Water Recycling Centre) will need to be upgraded before any development can take place at Chilton Woods. This is essential to ensure that there is capacity in the sewer system and to avoid an increase in flood risk.

The Council welcomes AWS's response as follows, AWS have identified works totalling some £470,000 before development can proceed (to be funded by AWS and SCC). This includes providing additional storage on Hawkins Road and Aubrey Drive and increasing storage capacity at Waldingfield Road pumping station. Whilst the detail of this is all to be agreed, it is clear that all of this work will need to be done before any development happens at Chilton Woods to both ensure foul drainage capacity and avoid an increase in flood risk.

- Re-site the existing lorry park in Sudbury to a location within the Chilton Woods development. Possibly resulting in a reduction in the number of lorries going in and out of the town centre.
- We would suggest that the recycling site should come in the first phase of the development.
- Sudbury Town Council has serious concerns that no indication has yet been given to the proposed percentage of affordable housing at this site.

Paul Hankins

Subject: FW: Consultation Request - Babergh District Council, Chilton Woods B/15/01718

From: Christine Page <christine.page@sudburytowncouncil.co.uk>

Sent: 10 October 2017 10:45:39

To: Steven Stroud

Cc: Jacqueline Pannifer

Subject: Consultation Request - Babergh District Council, Chilton Woods B/15/01718

Dear Steven,

The Chilton Woods proposed development was discussed at the Planning Meeting held on Monday 9th October. The Planning Committee comments were as follows;
Sudbury Town Council notes the viability reports, but we would like to see the affordable housing maximised at every phase of the development.

I have added these comments to the Planning Application on the Babergh Website.

Kind Regards
Christine Page
Customer Services Adviser
Sudbury Town Council

Christopher Tucker

From: Acton Parish Council <actonpc@btinternet.com>
Sent: 13 March 2016 15:28
To: Planning Emails
Subject: B/15/01718
Attachments: Slide 9.docx

Application Reference B/15/01718

Chilton Woods Mixed Use Development.

Dear Ben Elvin

Although the bulk of this application is not within the parish of Acton, the traffic implications for Acton are a cause for concern. If the council are mindful to approve the application then we would like the following comments to be taken in to consideration and the points be imposed.

- We are concerned that Acton Lane / Sudbury Road should not become a rat run for the northerly traffic leaving or accessing the site. After many discussions with the consultancy agency AMEC, the road design currently shown on the master plan has been altered to discourage the use of Acton Lane / Sudbury Road as a route to travel north from the site. In view of the fact that everything except the junctions with the A134 are reserved matters, the members of the council and local residents are very concerned that this lay out which effects Acton Lane/ Sudbury Road does not get altered in any way. Ultimately, we would like to see the southern part of Acton lane closed to vehicle traffic, as the proposal. Please see attached slide produced by AMEC detailing this closure. We would like to see this completed when the school is being built. Acton Lane / Sudbury Road is not a road that could cope with an increase in traffic. The junction at the High Street opposite the Crown Public House already dangerous with parked cars making the road narrow. We would remind the planning authority that when a previous local plan was considered in the early 1990's, the planning inspector stated that after public enquiry that this junction was unsuitable for additional traffic and incapable of being improved. The residents of Newmans Green are also concerned to see as little traffic as possible leaving the site via Acton Lane / Sudbury Road, because they are worried that Mills Lane could become a rat run. It is completely unsuitable as some of the road is single track and liable to flooding.

It was also strongly suggested that calming measures be installed between the north of the site and Newmans Green, in order to discourage extra usage and slow any traffic down. This would have to be done sympathetically to still allow the local farmers access to their fields.

- At a recent meeting with AMEC, it was stated the majority of the construction traffic will be travelling from Bury St Edmunds to the site. Acton Parish Council strongly urges the condition be placed on any planning consent specifying that no construction traffic should approach the site from the northern end of via Acton Lane / Sudbury Road. To avoid problems with construction traffic it is important that the feeder road from the new roundabout located at Tesco be built first.

- The members of the council have serious concerns regarding the plans to only build the school during phase two of the scheme. To provide education is a priority, and as the local schools at present already have some years that are oversubscribed this situation will only get worse. The members feel very strongly about any increase in the current schools could be detrimental to the younger generation. It is not simply a question of adding extra classrooms but looking at all the facilities in the school such as dining rooms, toilets and assembly hall etc. AMEC talks about £500K begin used to provide new permanent classrooms to any local schools that may have the room for development. We would ask that this be made part of the legal agreement and the plans put into place as soon as the development starts. To quote the planning section from the NPPF (National Planning and Policy Framework), it is;
Within the Introduction at Part 5, Resolution 42/187 of the United Nations General Assembly defined sustainable development as "meeting the needs of the present without compromising the ability of future generations to meet their own needs."

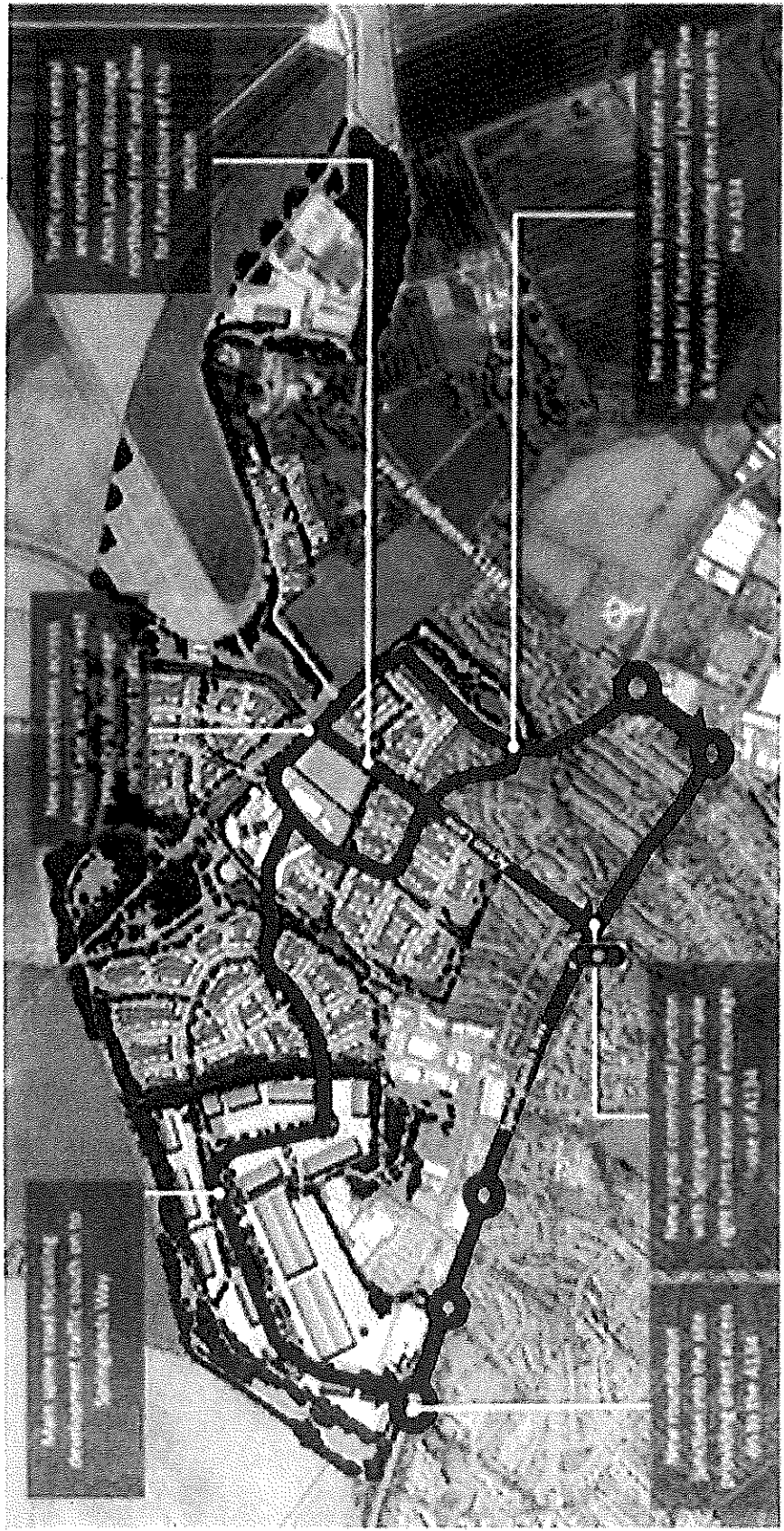
Any enlargement of Acton Primary school will impact the traffic in Lambert Drive. There is already an issue at school pick up and drop off times which will need to be addressed.

An enormous amount of work has been put into the illustrative master plan. In view of the fact that nearly all matters are reserved at this outline planning stage, Acton Parish Council feels that it is imperative that precise and tight conditions are imposed on any approval in order to ensure that Chilton Woods is ultimately an acceptable future development.

Finally, we note the concerns of Deloitte Real Estate regarding the viability with the entire proposal. We trust that the planning authority will not approve the proposal unless it can be clearly demonstrated that it is viable.

Avoiding rural routes and focussing traffic on to the A134 Springlands Way

x T h e



Acton Parish Council

Paul MacLachlan, Clerk, 17 The Glebe, Lavenham, Suffolk, CO10 9SN
Tel: 07958 932480 Email: actonparishcouncil@gmail.com

Application B/15/1718/OUT Chilton Woods mixed use development Land north of Woodhall Business Park, Sudbury

This application was considered at a full meeting of the Parish Council on Monday 19 June 2017. It was the unanimous recommendation of the Council that the application be **REFUSED**.

The Council asks the Planning Authority to take into account comments expressed by the Council in its earlier response dated March 2016.

The Council's further reasons for making this recommendation are as follows:

1. Reserved matters

The Council feels it is inappropriate to reserve all matters with the exception of access. Access and junctions should not be predetermined as they need to be developed in sympathy with the specific needs of the communities and infrastructure they serve.

It is **RECOMMENDED** that:

the Planning Authority insists that access issues are reserved until there is greater certainty regarding the housing and supporting infrastructure to emerge from this project.

2. Traffic Flows along Acton Lane

2.1 Referring to the document, *Scope of Transport Assessment 2015*, the Council asks the Planning Authority to:

- (i) use a base residential trip distribution scenario of 55% via Aubrey Drive and 45% via Acton Lane;
- (ii) note that the currently projected peak traffic flow of 571 vehicles per hour is residential only and takes no account of the inevitable school commutes (see para 3.14) to Acton Primary School and the further commercial and industrial traffic generated by the development;
- (iii) recognise that, as the development approaches completion, traffic flows along Acton Lane will almost certainly exceed 600 per hour during the peak hour.

2.2 The Council calls on the Planning Authority to recognise that the proposed development will generate very significant traffic flows along Acton Lane and to take effective measures to prevent traffic from using Mills Lane, which is both single track and a designated cycle route, as a convenient cut through to the A134.

It is **RECOMMENDED** that:

consideration be given to the closure of Mills Lane between Newman's Green and Potter's Tye Farm so that it serves merely as an access road, either east to Acton Lane or west to the A134 but not both.

2.3 The Council is advised by Bryn Griffiths, Assistant Director Infrastructure and Waste Resource Management, Suffolk County Council, that the following measures will be implemented to discourage northbound traffic 'as far as possible':

Acton Parish Council

Paul MacLachlan, Clerk, 17 The Glebe, Lavenham, Suffolk, CO10 9SN
Tel: 07958 932480 Email: actonparishcouncil@gmail.com

- providing a new signal controlled junction at Acton Lane/Springlands Way to make it more attractive for northbound traffic to use this route (an easier right turn from Acton Lane on to Springlands Way to then head north via the A134);
- prioritising east-west traffic flows across Acton Lane requiring northbound traffic to give way;
- proposing traffic calming measures on Acton Lane, which will also support walking and cycling.
- allowing for the central section of Acton Lane to be closed in the future if required (subject to a separate approval process).

The Council does not believe that these measures will provide sufficient deterrent to northbound traffic and asks the Planning Authority to recognise that special consideration needs to be given to the impact of increased residential and employment traffic on the village of Acton.

The Council, once again, draws attention to the inevitable bottleneck at the junction of Sudbury Road/High Street/Melford Road (opposite the Crown public house) and the view of Suffolk County Council Highways Department that existing plans do not provide adequate access to the site from the north.

It is **RECOMMENDED** that:

the Planning Authority insists on effective measures to prevent high volumes of traffic using the Acton Lane/Sudbury Road/Melford Road route to the A134 and that these measures are implemented at an early stage in the development to prevent, rather than cure, the problem.

- 2.4 The Planning Authority is asked to consider the implication of 600+ vehicle trips in the peak hour on pedestrians and cyclists wishing to use Acton Lane.

3. Noise abatement

Residents advise that, because of the flat topography, the noise generated by events held on Waldingfield Airfield can be heard in Acton. The Planning Authority is asked to impose a condition that an effective acoustic barrier be built surrounding the playing fields to mitigate the noise generated.

4. Education provision

The Council wishes to restate its conviction that delay in the building of the new primary school within the scheme is unacceptable as there is insufficient capacity within existing local schools to accommodate the anticipated additional pupil numbers. Furthermore, the additional vehicle journeys arising from the school commute will exacerbate traffic flows during peak hours.

It is **RECOMMENDED** that:

the new school be built much earlier in the development cycle.

Paul MacLachlan
Clerk, Acton Parish Council
23 June 2017

Long Melford Parish Council

1 Milestone House, Hall Street, Long Melford CO10 9HZ

Telephone : 01787 378084

Email : Clerk@longmelford-pc.gov.uk



Development Manager
FAO Steven Stroud and Ben Elvin
Babergh District Council
Corks Lane
Hadleigh
Ipswich IP7 6SJ

06 Oct 2017

Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include 81, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works

Dear Sirs

The following is the objection of Long Melford Parish Council (Infrastructure). It is the opinion of the Parish council that not enough thought has been applied to the already over-burdened infrastructure, and fixing the problem after the development would create too much of a burden on the locality:

- (1) The Parish Council have been assured that traffic studies for the proposed development indicate that up to 40% of the development would be using the A134 (long Melford Bypass). This additional traffic will make an existing access point onto the A134 (Bull Lane Intersection) more dangerous than it already is. This is an unacceptable and highly dangerous position in which to place the residents of Long Melford.

(2) The existing infrastructure within the town of Sudbury is already creaking, and urgent calls for a Western Bypass are being assembled. The addition of further homes and businesses at the Eastern end of town will invoke additional traffic through the town, and therefore greater need for the proposed bypass. This will have a significant and detrimental knock-on-effect for the village of Long Melford

Sincerely,

Rob Williams

Clerk to the Parish Council.

Comments for Planning Application B/15/01718

Application Summary

Application Number: B/15/01718

Address: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

Proposal: Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Case Officer: Ben Elvin

Customer Details

Name: Mr Dave Crimmin

Address: Cragston, Sudbury Road, Newton, SUDBURY CO10 0QH

Comment Details

Commenter Type: Statutory Consultee

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Great Waldingfield Parish councillors reviewed Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings and resolved to object to the planning application on the following grounds:

- i. The illustrative masterplan for the application needs to show how the site will look not how it could look and the LPA will be failing in its duty if this is not tied in with conditions should permission be given.
- ii. The new access road off Springlands Way, west of Tesco, going through the industrial area of Chilton Woods is essential from the start of the development and all construction traffic should use this entrance while the site is developed. GWPC would contend that this is required so that all the existing road infrastructure surrounding the site is left with just the vehicle movements created by new residents.
- iii. The proposals to improve the road infrastructure around the development show signs of failure when the site is only partly developed in 2024. The applicant needs to demonstrate that any infrastructure improvements will still work when the development is complete in 2031.
- iv. There is no analysis of the impact that the traffic flow will have beyond the Waldingfield Road

junction with Valley Road. The applicant needs to demonstrate what volume of traffic will use the following road infrastructure in 2031:

B1115 through the village of Great Waldingfield

the B1115 junction towards Ten Trees Road

down Valley Road towards the A134 junction at Newton.

v. The new primary school and nursery need to be developed early in Phase 1 and not wait until more than half the site is built as is currently proposed by the applicant. The need to transport children from the development to other local schools should be kept to the minimum as should be the impact on other local primary schools in the area which are already oversubscribed.

vi. The cost of building the primary school will not have an impact on the viability of the project if it is built as an academy as it would therefore come out of central government funds.

vii. The eastern boundary should have woodland enclosing the development, as defined on the application site boundary, thus encapsulating the sports pitches and the county wildlife site and maintaining a bio diversity trail around the development.

Comments for Planning Application B/15/01718

Application Summary

Application Number: B/15/01718

Address: Chilton Woods Mixed Use Development Land North Of Woodhall Business Park Sudbury

Proposal: Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Case Officer: Ben Elvin

Customer Details

Name: Mr David Crimmin

Address: Cragston, Sudbury Road, Newton Sudbury, Suffolk CO10 0QH

Comment Details

Commenter Type: Parish Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: GWPC councillors reviewed Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury - Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development. The councillors were disappointed that the additional information supplied by the applicant had not been reviewed by SCC Highways or its consultants in time for the councillors to take their views into account in this re-consultation. The councillors resolved to object to the planning application on the following grounds:

- i. The "illustrative masterplan" for the application needs to show "how the site will look" not "how it could look" and the LPA will be failing in its duty if this is not tied in with conditions should permission be given.
- ii. The new access road off Springlands Way, west of Tesco, going through the industrial area of Chilton Woods is essential from the start of the development and all construction traffic should use this entrance while the site is developed. GWPC would contend that this is required so that all the existing road infrastructure surrounding the site is left with just the vehicle movements created by new residents.
- iii. The applicant's consultants had promised, at the meeting held on the 7th March 2016, that they would hold a further meeting with the community to discuss all the issues with the transport

assessment. The applicant has failed to undertake this task so that the mitigation to improve the road infrastructure around the development has not been demonstrated in terms that the community can appreciate. The applicant needs to demonstrate that any infrastructure improvements will still work when the development is complete.

iv. The applicant needs to demonstrate what volume of traffic will use the following road infrastructure at the end of the development:

- B1115 through the village of Great Waldingfield
- the B1115 junction towards Ten Trees Road.

v. The proposal for the A134 junction with Valley Road should be a roundabout as the proposals for turning out of Valley Road do not work currently, let alone when the extra lane is created on the A134.

vi. The new primary school and nursery need to be developed early in Phase 1 and not wait until more than half the site is built as is currently proposed by the applicant. The need to transport children from the development to other local schools should be kept to the minimum as should be the impact on other local primary schools in the area which are already oversubscribed.

vii. The cost of building the primary school will not have an impact on the viability of the project if it is built as an academy as it would therefore come out of central government funds.

viii. The eastern boundary should have woodland enclosing the development, as defined on the application site boundary, thus encapsulating the sports pitches and the county wildlife site and maintaining a bio diversity trail around the development.

Paul Hankins

Subject: FW: Planning Application B/15/01718 Chilton Woods

From: Dave Crimmin <gtwaldingfieldpc@btinternet.com>

Sent: 10 October 2017 13:25:24

To: Steven Stroud; BMSDC Planning Area Team Green

Cc: Frank Lawrenson; Margaret Maybury

Subject: Planning Application B/15/01718 Chilton Woods

Dear Steven

At last night's GWPC meeting the councillors reviewed revisions to **Planning Application B/15/01718 Chilton Woods** in relation to proposals for the flow of construction traffic and were concerned that they had not been consulted on these by Babergh as the construction traffic impact on residents of Great Waldingfield had been raised by GWPC in previous consultations.

With the applicant proposing to use the B1115 and entrances to the airfield in Waldingfield Road and Aubrey Drive the councillors are concerned over construction traffic movements through Great Waldingfield and the on the B1115 from the McDonalds roundabout. The councillors would strongly urge the LPA to limit access to the site for construction traffic to the new access road off Springlands Way, west of Tesco, going through the industrial area of Chilton Woods. This is essential from the start of the development and all construction traffic should use this entrance while the site is developed. GWPC would contend that this is required so that all the existing road infrastructure surrounding the site is left with just the vehicle movements created by new residents.

Regards

Dave Crimmin MILCM

Clerk to Great Waldingfield Parish Council

01787 375085

Electronic Message Received

Message Type: DCONLINECOMMENT
CaseFullRef: B/15/01718
Location: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

An electronic message was submitted to Acolaid on 17/03/2016 and was processed on 17/03/2016

Online Comment

Contact Name: Mr Dave Crimmin

Address: Cragston
Sudbury Road
Newton
SUDBURY

Postcode: CO10 0QH

Email Address: clerk.littlewaldingfieldpc@hotmail.co.uk

Representation: OBJ

Comment: Little Waldingfield Parish councillors reviewed Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury ? Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings and resolved to object to the application on the following grounds:

- i. The new access road off Springlands Way, west of Tesco, going through the industrial area of Chilton Woods is essential from the start of the development and to be the principle access for all construction traffic while the site is developed. The Construction Management Plan for the development should only permit lorries to enter the site via the A134 from Bury St Edmunds.
- ii. The new primary school and nursery need to be developed early in Phase 1 and not wait until Phase 2 to 3 as is currently proposed by the applicant. The need to transport children from the development to other local schools should be kept to a minimum.
- iii. The councillors questioned the ratio of 0.5 movements per household used in the modelling of the transport assessment as, in their opinion, this appeared to be on the low side.

Electronic Message Received

Message Type: DCONLINECOMMENT
CaseFullRef: B/15/01718
Location: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

An electronic message was submitted to Acolaid on 05/03/2016 and was processed on 07/03/2016

Online Comment

Contact Name: Mr Dave Crimmin
Address: Cragston
Sudbury Road
Newton
SUDBURY
Postcode: CO10 0QH
Email Address: yourclerk@btinternet.com
Representation: OBJ

Comment: Little Cornard Parish councillors reviewed the impact of Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury ? Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings and councillors resolved to raise the following concerns relating to the application:

- i. The increase in traffic generated by the scheme and the consequential increase of the air pollution in Sudbury needs to be mitigated
- ii. In order to ensure that the construction management plan for the scheme has minimal impact on the existing road users around the development, the new road for the scheme has to be implemented first and all construction traffic to use the A134 from Bury St Edmunds and the new road for access
- iii. The building of the primary school within the scheme should be completed within Phase 1 of the scheme to remove the necessity for children living on the development to travel outside the site for education.



NEWTON PARISH COUNCIL

Clerk: Dave Crimmin
Cragston, Sudbury Road, Newton, Sudbury, Suffolk CO10 0QH
Tel: 01787 375085 email: dave.crimmin@btinternet.com

21st March 2016

Development Management
Babergh District Council
Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Dear Mr Elvin

Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park - Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

At the Newton Parish Council meeting held on the 9th March 2016 the councillors resolved to object to the above planning application on the following grounds:

The application is contrary to Babergh Policies CS4 and CS15 in regard to sustainability. In addition,

"1.3.2 Traffic congestion and air pollution due to traffic are also important issues in some parts of the district. The potential pollution hotspots relate to the A12 and A14 trunk roads and the A131 southern approach to Sudbury, which carry relatively high volumes of fast-flowing traffic. The Ballingdon Street, Cross Street and Church Street area of Sudbury has been designated an Air Quality Management Area (AQMA) as a consequence of traffic congestion and air pollution."

"3.3.10.2 The impact of new development goes beyond appearance, and it is important that it is designed to respect the environment, make the best use of scarce resources, ensure sufficient infrastructure is available or provided, and contribute positively to and to cope with the effects of climate change."

Specifically the impact of the traffic generated by the development has not been sufficiently mitigated and presents a high probability of harm to neighbouring communities as a result. Sudbury is a 1000 year-old market town and was not built for the level of traffic seen today, nor is there great scope for wider roads. In addition, the site is very likely to attract people who may work in Bury St Edmunds, Cambridge, Colchester, Ipswich or even Stansted Airport. So the impact of the resulting traffic on the wider road network needs to be considered to avoid misery for communities hit by rat-running as a result of ineffective mitigation to ensure the main roads can take the traffic this development will generate.

Specific issues that need to be addressed:

1 Scope of Travel Plan

1.1 The applicant, Suffolk County Council (SCC), is also the Highways Authority. This always presents a difficulty as the applicant needs to demonstrate that it has carried out its role as Highway Authority without fear or favour despite the significant financial benefit SCC stands to gain from minimising off-site junction improvements. It is therefore particularly discouraging to find that SCC Highways has ignored the Chilton Woods Place Shaping Group, common sense and the advice of their own consultants, AMEC, all of whom have recommended a broader and more coherent geographical study area be scoped for junction improvement. It is important that Babergh Development Control hold SCC to account and ensure that they do "the right thing" and not appear to be seeking to cut corners.

1.2 None of the junctions tested are more than 1 mile from the site. The Place Shaping Group were told by AMEC on 7th March 2016 that the Highways Authority had "despite [AMEC's] asking, repeatedly declined to have more junctions looked at". In doing so they have caused to be produced a development proposal that is unsound and cannot be allowed to proceed without a significant improvement.

1.3 Specifically, the following sites need to be tested for mitigation:

- a) Newton Road / B1508 / King Street junction at Sudbury (Belle Vue Junction)
- b) Valley Road / A134 junction at Newton (rat running from development site via Great Waldingfield)
- c) A1071 / A134 junction at Newton
- d) A134 / Bull lane junction at Long Melford
- e) A134 / A1141 at Bradfield Combust (rat running from development site via Lavenham)
- f) A134 / A1302 junction at Bury St Edmunds
- g) B1064 / Borley Road junction at Long Melford (for traffic heading to Cambridge)
- h) B1092 / B1063 junction at Clare (for traffic heading to Cambridge)
- i) A134 / B1508 junction at Colchester North Station, Colchester.

2 Inadequate Transport Assessment

2.1 The data used is based on 15-year-old traffic census data. This means the importance of getting modelling right and using substantial and robust contemporary data is huge. If there is any doubt about the basis of assumptions, they need to be challenged. NPC is not satisfied that the data collection is robust.

2.2 The work by AMEC in testing the junctions within the transport assessment under-reports traffic issues. In particular, the methodology used to assess junctions is predicated on counting stationary traffic at the cusp of the junction only. This means that tailbacks of traffic may stretch far further but if the nature of the junction means that traffic at the head of the queue is generally rolling forward, the calculation of the queue is artificially short. The most obvious example of inadequate testing is shown below:

4.3 Operational performance of junctions table 4.8 Junction 7.

	AM Peak Hour		PM Peak Hour Arm	
	Max RFC	Max q length (PCU)	Max RFC	Max q length (PCU)
Arm 1 – A134	0.69	2.4	0.76	3.2
Arm 2 – Shawlands Avenue	0.76	3.2	0.52	1.1
Arm 3 – Newton Road	0.53	1.2	0.64	1.8
Arm 4 – Northern Road	0.54	1.2	0.83	4.6

2.3 This alleges the maximum queue length on Northern Road is just 4.6 cars. Anyone who uses this road between 5pm and 6pm will be well aware that the queue backs up every night to well past Milner Road, a distance of 250m. As a maximum it can regularly reach back to Martins Road, a distance of 350m. The problem is that the roundabout slows traffic sufficiently that a rolling queue on the A134 Northern Road reaches back to Windham Road and Milner Road, which supply a large amount of traffic joining the main carriageway from businesses such as Purina. This means there is stationary traffic further back from the junction, but this is missed by the data collection.

2.4 In addition, the mitigation proposed for this roundabout is effectively zero, as the recommendation is for two lanes of traffic being able to enter the roundabout from each arm – but that is how the junction operates now. The road markings may not be there, but that is actual driver behaviour.

2.5 The second example of inadequate testing is the B1115 between Newmans Road and Banham Drive, which is the road that leads from the Waldingfield Roundabout down into Sudbury at the East Street traffic lights. The 2024 figures for traffic on this section of road are as follows:

B1115 South: 456	B1115 South: 423
B1115 North: 434	B1115 North: 690

Despite predicting over 1100 cars passing this section per hour at peak evening time, the document is entirely silent on the 200m+ section of highway which has marked parking bays narrowing the road to a single carriageway.

2.6 The Transport Assessment ignores failures in testing without explanation and offers no mitigation as a result. Tables 7.12, 10.12 and 10.14 all have saturation rates for arms of junctions above 84.9%, which is the limit of capacity for a junction. In requiring the applicant to improve the mitigation to these junctions, the planning authority should set a target capacity that provides sufficient degree of capacity to cope up to 2031, so any mitigation that fails to bring predicted saturation below 75% should be rejected as inadequate. This is necessary for the protection of the town and not unreasonable in the case of this applicant who is, after all, the Highways authority.

2.7 The third example of inadequate testing is that the A131 Cross Street area has not been tested. This is another area of Sudbury with a narrow road which is identified as being a direction of travel in the travel plan, but no testing has been carried out and subsequently no mitigation proposed.

3 Other Matters

3.1 Impact of traffic on existing communities adjacent to the site:

The proposal to build the western access via a roundabout onto the A134 last is flawed. It should be built first. Primarily this would be a far better access route to the development for construction traffic by providing a bigger access point and a long drive-in/out to keep mud well away from the public highway. The absence of a transport plan for the construction phase is regrettable, as this issue would have been picked up by it. It will also mean that even early residents of the development can exit this way and avoid Aubrey Drive and Acton Lane needing to experience high traffic volumes.

3.2 Acton Lane/A134 traffic light controlled junction

The proposal for this junction include the installation of traffic lights to facilitate right turns. This is understood. What is not understood is why the phasing needs to include a pedestrian crossing phase. This T junction faces a grass bank with no pavement. The A134 Springlands Way is in a cutting. About 10m East of the proposed crossing is a pedestrian bridge which is at "street level" for the residential

roads either side of Springlands Way. Encouraging pedestrians down into the cutting is dangerous and the required phase in the lights and subsequent additional delay to traffic is unnecessary and should be eliminated from the scheme.

3.3 Masterplan

The outline planning application, when the sustainability and other issues are resolved, must include clear conditions that the approval requires the subsequent planning applications to be in conformity with the Chilton Woods Masterplan as it stands at the point at which approval of this permission was granted. This is to ensure that the mitigation measures remain relevant to the eventual development and are not rendered ineffective by material changes in future proposals.

Yours sincerely

A black rectangular redaction box covering the signature of Dave Crimmin.

Dave Crimmin MILCM
Clerk to Newton Parish Council

Comments for Planning Application B/15/01718

Application Summary

Application Number: B/15/01718

Address: Chilton Woods Mixed Use Development Land North Of Woodhall Business Park Sudbury

Proposal: Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Case Officer: Steven Stroud

Customer Details

Name: Mr David Crimmin

Address: Cragston, Sudbury Road, Newton Sudbury, Suffolk CO10 0QH

Comment Details

Commenter Type: Parish Council

Stance: Customer objects to the Planning Application

Comment Reasons:

- Inadequate Access
- Information missing from plans
- Traffic or Highways

Comment: Newton Parish councillors reviewed Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury - Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development and resolved to object to the planning application on the following grounds:

i. NPC is disappointed that the Highways amendments set out in the Planning Comments document are so limited in scope. The councillors welcome the acknowledgement that the A134 / Valley Road junction requires work, but are not convinced that creating a right turn lane on the A134 is safe or sufficient. The proposal does not address vehicles turning right out of Valley Road and indeed a queue of vehicles waiting to turn right into Valley Road could obscure the visibility of traffic turning right out of Valley Road. Both for the emerging traffic and westbound traffic proceeding along the A134 which will be passing the waiting queue on the inside at 40mph. In any case, how long can the proposed right-hand turn lane be, before the queue still backs onto the main carriageway - only now potentially much closer to the bend just outside Newton - Loss of

hedgerow would be needed to provide sufficient visibility for traffic coming up behind that queue. A mini roundabout would surely serve for better traffic flow and safety, which would also suit (and enforce) the lower maximum speed limit proposed for the road.

ii. NPC is disappointed that there are still no proposals to improve the junction at Northern Road / Milner Road (Martin's Buildbase) junction on the industrial estate. This is now a busy turning in the morning with northbound traffic queuing behind vehicles turning right into Milner Road regularly backing up to the KFC roundabout. The additional traffic generated by the Chilton Woods development coming southbound in the morning will make turning opportunities even rarer and therefore back up the queuing traffic for longer, snarling the KFC roundabout.

iii. There is also no mention of dispensing with the idea to put a light-controlled pedestrian crossing phase in at Acton Lane onto the A134, for pedestrians heading for Stanley Wood Avenue, to walk into town. There are no desire lines tracked on the verge to indicate anyone crosses here - not surprising as there is the footbridge and footpath network directly adjacent to this. Bringing pedestrians and cyclists down into the cutting to cross the bypass is downright dangerous and entirely a pointless duplication of the existing provision.

iv. The above issues suggest to NPC that the S106 Highways improvements are just not being thought through properly. Why has the developer dispensed with the community consultation group meetings? They were told most of these issues at previous meetings.

v. The decision to open up the employment land and Western access to Chilton Woods earlier in the development timeline is welcome. However, this must be used as the construction vehicle access for the site for the duration of the development. This will enable the Construction Management Plan to restrict the flow of construction traffic to the A134 to and from Bury St Edmunds and remove this traffic from the other roads and roundabouts around the site.

From: Great Cornard Parish Council
Sent: 21 June 2017 15:22
To: BMSDC Planning Area Team Green
Subject: Babergh District Council. Ref: B/15/01718 - Comment from Great Cornard

Good Afternoon

Please see below the comment from Great Cornard Parish Council:

The amendments are NOTED, however the parish council continues to express its concerns on the over development of the site and the lack of infrastructure in place to be able to cope with the increase in traffic this development will create.

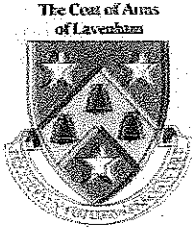
Regards
Nadine Tamlyn

*Nadine C. Tamlyn, Council Manager
Great Cornard Parish Council
The Stevenson Centre
Stevenson Approach
Great Cornard
CO10 0WD
01787 373212
greatcornardpc@tiscali.co.uk*

14/03/16

Comments
Received

BEL



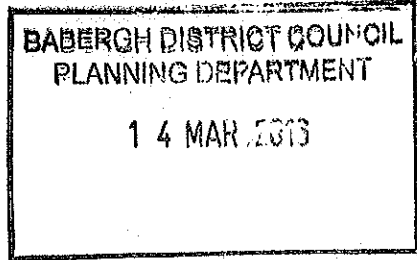
LAVENHAM PARISH COUNCIL

13 Weavers Close
Lavenham
Sudbury
Suffolk
CO10 9QN

J L BELLWARD
Clerk to the Council

Telephone: 01787 247041
Email: lavenhampc@yahoo.co.uk

Development Management
Babergh District Council
Corks Lane
Hadleigh
Ipswich
IP7 6SJ



10th March 2016

Dear Sirs

Ref: B/15/01718
Chilton Woods Mixed Use Development, land North of Woodhall Business Park, Sudbury

Lavenham Parish Council has considered the impact of this application and the main issues of concern as they apply to Lavenham appear to be:

- Infrastructure investment: to safeguard wider local provision of services, including utility services and traffic pressures, both local and further afield, need to be planned and provided before any development takes place,
- Landscaping of the site: to be put in place at the outset of the development to allow it to mature,
- Site Management Plan: to avoid any site traffic coming through Lavenham and surrounding villages,
- Affordable rental housing provision: requires early consideration and must meet the minimum 35% requirement set out in the Babergh D C Core Strategy, otherwise development pressure on villages, including Lavenham, could increase,
- Education: delay in the building of the new primary school within the scheme is not acceptable. Any delay leading to accommodation of the children at nearby schools will in turn lead to extra travel outside the scheme. In addition, nearby schools may also have to accommodate children from other new housing schemes proposed in those areas. Therefore, any school new-build should be built much earlier in the development cycle.

Yours faithfully



Jane Bellward
Clerk, Lavenham Parish Council



LAVENHAM PARISH COUNCIL

13 Weavers Close
Lavenham
Sudbury
Suffolk
CO10 9QN

J L BELLWARD
Clerk to the Council

Telephone: 01787 247041
Email: lavenhampc@yahoo.co.uk

Planning Department
Babergh District Council
Corks Lane
Hadleigh
Ipswich
IP7 6SJ

22nd June 2017

Dear Sirs

Ref: B/15/01718/OUT

Location: land north of Woodhall Business Park, Sudbury

Lavenham Parish Council is aware that the development of the Chilton Woods site is central to the strategic aims of the authority by adding 1,150 dwellings to the five year housing supply target. However, the plan must meet the other aims of any sustainable plan, including the emerging Local Plan for Babergh and Mid-Suffolk districts. As it stands the Chilton Woods proposal fails on two major grounds; infrastructure provision and affordable housing. Although this is an outline proposal both of these should be addressed at this time.

Lavenham Parish Council has considered the impact of this application and the main issues of concern are as follows;

- **Infrastructure investment:** to safeguard wider local provision of services, including utility services and traffic pressures, both local and further afield, need to be planned and provided before any development takes place. Indeed SCC Highway's consultants and others called for and were assured that a revised transport assessment would be forthcoming – it has not.
- **Landscaping of the site:** to be put in place at the outset of the development to allow it to mature, this should also recognize the aspirations to establish a 'green belt' around Sudbury to enhance bio-diversity and animal habitats.
- **Site Management Plan:** is essential to avoid any site traffic coming through Lavenham and surrounding villages.
- **Affordable rental housing provision:** requires early consideration and must meet the minimum 35% requirement set out in the Babergh D C Core Strategy, otherwise development pressure on villages, including Lavenham, could increase. Following the collapse of the Local Plan, arising from the lack of a five year housing supply, villages are already seeing opportunistic windfall developments coming forward.

- Education: delay in the building of the new primary school within the scheme is not acceptable. Any delay leading to accommodation of the children at nearby schools will in turn lead to extra travel outside the scheme. In addition, nearby schools may also have to accommodate children from other new housing schemes proposed in those areas. Therefore, any school new-build should be built much earlier in the development cycle.
- Viability may also be used by any party as an argument not to meet some infrastructure investment and in particular the 35% minimum requirement for affordable housing. It will be remembered that Babergh and Mid-Suffolk district councils commissioned two studies in this area and both reinforced the counter argument that viability at the strategic level is not an issue. The first report was carried out by Lambert Smith Hampton, when looking specifically at affordable housing and the second was by Peter Brett Associates when assessing the implications of the CIL charging rates and developer profitability.

Yours faithfully

Jane Bellward
Clerk to Lavenham Parish Council

Christopher Tucker

From: Planning Emails
Subject: FW: Comments for Planning Application B/15/01718

From: Planning.PA@babergh.gov.uk [mailto:Planning.PA@babergh.gov.uk]
Sent: 22 March 2016 10:13
To: Planning Emails
Subject: Comments for Planning Application B/15/01718

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:12 AM on 22 Mar 2016 from Mr Dave Crimmin.

Application Summary

Address: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

Proposal: Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Case Officer: Ben Elvin

[Click for further information](#)

Customer Details

Name: Mr Dave Crimmin
Email: assingtonpc@btinternet.com
Address: Cragston, Sudbury Road, Newton, SUDBURY CO10 0QH

Comments Details

Commenter Type: Statutory Consultee
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: Assington Parish councillors reviewed Planning Application B/15/01718 Chilton Woods Mixed Use

Development, Land North of, Woodhall Business Park, Sudbury – Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings and resolved to object to the planning application on the following grounds: i. The impact that the Chilton Woods generated traffic will have upon the A134 through the village and traffic using The Street. The councillors remain unconvinced that the increase in traffic can be safely accommodated along this stretch of A134 that already has an unacceptable level of fatal RTA's recorded on the bends towards Leavenheath. ii. The modelling to quantify the Chilton Woods generated traffic are based on 2024 when the site is only partly developed. The applicant needs to quantify the traffic movements when the development is complete in 2031.

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council shall be understood as neither given nor endorsed by Babergh District Council.

The Old Rectory
Rectory Road, Great Waldingfield
Suffolk CO10 0TL

+44 (0) 1787 372428
frank@lawrensons.net

22nd June 2017

Dear Sirs,

Thank you very much for the Chilton Woods Proposal and all the thought that has gone into it.

There are a number of concerns that I wish to raise in my capacity as:

- A resident in this ward
- A member of the Chilton Woods steering group
- District councillor for this area

These concerns center on the following themes:

- The Commercial District and the allocation for various business uses
- Chilton Airfield and the lack of a proper woodland barrier
- Infrastructure concerns
- Lack of proper consultation
- The Elderly, Sheltered Housing, Affordable Housing
- Lighting and Cables

I hope that you will take these items into consideration when considering the planning application.

With thanks

Yours sincerely,

frank

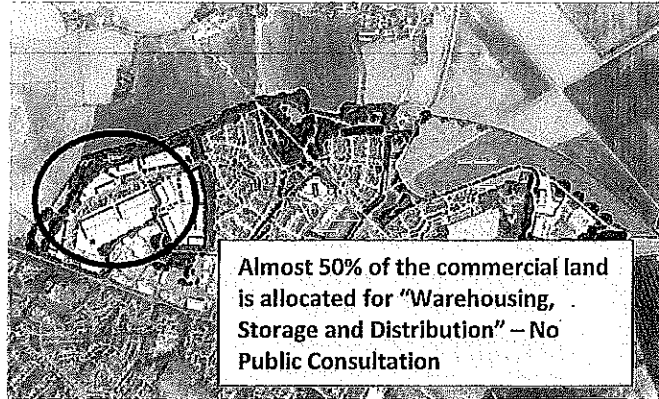
Frank Lawrenson
Councillor for Waldingfield

Point 1 – The Commercial Area

The first point that needs mentioning is that the proposed allocation of land usage for the commercial district was NOT included in the consultation process. It is my belief that the public should have been consulted on this point. Local people have a right to know what sort of job opportunities will be made available in their area.

That said, the proposed uses as outlined by SCC, do not appear to be suitable for this location.

Specifically, SCC's proposal that such a substantial part of the land be allocated for "Warehousing, Storage and Distribution". This is inappropriate for a location that doesn't have a single dual carriageway and already receives numerous traffic complaints.



Of equal importance, the proposed uses are inconsistent with the views of both SCC and BDC. I refer to: The Suffolk Growth Strategy (SGS) which both SCC and BDC have formally approved at Council and signed. The SGS carefully lays out what is in fact suitable.

One also needs to consider that Sudbury is identified by the SGS as a "key strategic town" and therefore it is vital that both ourselves and Suffolk County Council set an example and practice what we preach. The following points in the SGS are especially applicable:

1. Barriers to Growth

"3.3.5 Suffolk's economic base is weighted towards lower value-added activities, with lower potential for growth. This is reflected in lower productivity rates (in terms of GVA per head) compared to the national average. Meanwhile, some sectors with potential for high value-added, green growth remain a relatively small part of Suffolk's economy.

3.37 It has become harder to start up a new enterprise in Suffolk in recent years"

3.38 Despite Suffolk's generally good connectivity, 80% of businesses say they have been adversely affected by shortcomings in the transport network. "

To my mind, these barriers are not addressed by the current proposal. In fact they would be made worse and thus be contrary to the Growth Strategy.

Suffolk Growth Strategy - Our Vision: Suffolk in 2028

In the year 2028, Suffolk is home to 800,000 people, 350,000 jobs – and with its beautiful landscapes and natural environment, independent surveys confirm that it offers the best quality of life in Europe. Employment rates remain above the national average and unemployment is low – under 4%. *With many more high-value jobs in the county, far fewer residents commute elsewhere to work and our young people have good local work prospects.*

2. Areas of Industry we should be focussing on and Inward Investment

"We see significant potential for the growth of the Suffolk economy. Working closely with the New Anglia LEP we see potential in nine key sectors:"

- *Advanced manufacturing and technology (AMT);*
- *Energy;*
- *Information and communication technology (ICT);*
- *Finance and insurance;*
- *Food, drink and agriculture;*
- *Ports and logistics;*
- *Biotechnology and bloodstock;*
- *Tourism;*
- *Creative and cultural industries.*

Why is SCC proposing to bring more B8 businesses to Sudbury, contrary to the SGS?

"The growth of the Suffolk economy relies on: established Suffolk businesses becoming more competitive and expanding their markets beyond our borders; more companies investing in Suffolk; creating new companies which have high growth potential.

Inward Investment will be achieved by:

- *securing inward investment;*
- *accelerating small business start ups;*
- *enabling Suffolk companies to increase their exports to the rest of the world;*
- *supporting small businesses and encouraging innovation; and*
- *increasing green economic activity arising from public agency procurement; and*
- *improving business resource efficiency."*

Why is "The Suffolk Growth Strategy" not factored into the plans for our "Key Strategic Town"?

To be honest I fail to see how allocating almost 50% of the commercial land to "Warehousing, Storage and Distribution" will achieve these goals?

3. The SGS identifies the following activities as being suitable for commercial/employment growth around Sudbury:

*"Chilton Woods: 15.7 hectares of greenfield land, part of a mixed use development of 1050 homes, and suitable for a range of uses including **business park, research and development, manufacturing, and graduation space.** This site has the potential to deliver around 2500 jobs. "*

The proposal runs directly contrary to this. The people of Babergh, Sudbury and the surrounding areas deserve better. The SGS was prepared for a reason. Where is the business park? The proposal does not explain these shortcomings and why almost 50% of the site has been allocated to warehousing, storage and distribution.

4. Addressing employment needs

The statistics show that Babergh is fortunate to have very low unemployment but also very low average wages. **This is the key component of why housing is less affordable in this region.** The SGS states that we need to be up-skilling our workforce and again the proposed

allocation does not endorse a move to higher paid/higher skilled activities. We therefore need to be attracting businesses that pay better, offer more career opportunities and which encourage our younger people to stay in the area i.e A2 and B1.

The proposal does not address this issue. The project is due to run to 2024. But the SGS states that by 2028 we will have *"many more high-value jobs in the county...our young people have good local work prospects"*. **This proposal runs contrary to that objective.**

This application will perpetuate a low wage economy around Sudbury and do extensive damage to the possibility of increasing wealth in the region and hence the affordability of housing. As such it will serve to have an extremely negative impact on our beloved market town, driving low paid workers to the superstores and keeping our town center shops empty. The people of Sudbury deserve better!

On these grounds I recommend Refusal to grant planning permission

Point 2 – Infrastructure

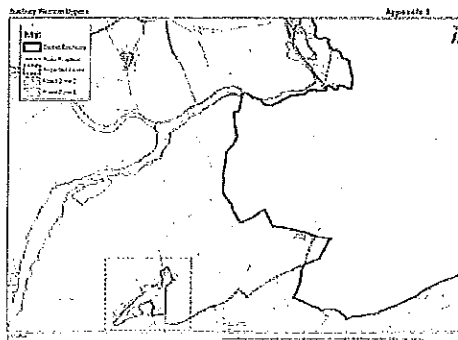
The main concern is a lack of belief by the community that the Infrastructure will be able to cope with the increase in housing and the proposed commercial activities. The parishes receive a significant amount of complaints already regarding traffic on our tiny roads. The Chilton Woods Steering group has not received replies on two main concerns.

1. Concerns over infrastructure raised by Aecom
2. A plain English explanation on the traffic effects. i.e. how much longer will it take to get through different points in Sudbury at various times of the day

Chilton Woods cannot be taken in isolation from the housing plans in Great Cornard or the as yet undeveloped land remaining to the North East of Sudbury around the Northern Road or the as yet incomplete plans for the regeneration of Hamilton Road.

The Suffolk Growth Strategy states the following.

"Infrastructure - To serve the needs of expanding companies and to ensure that our principal economic growth locations are indeed competitive, we must continuously improve our infrastructure. We have identified those investments which are of key importance to Suffolk's future prosperity: enhancing our digital communications networks; strengthening the strategic rail network; improvements to the strategic road network and key local improvements; and improving our water and other utilities networks, to ensure reliable supply and reduce environmental impact."



"Around the key market towns of Sudbury, Stowmarket and Hadleigh there is a particular need for the Sudbury Western Bypass to relieve the town of heavy traffic and improve its quality of life"

With a need having now been identified, many are dubious that Chilton Woods is now viable

without a western bypass/relief road or improvements to the Sudbury Rail line. Much has changed since the land became a designated site. Current planning permissions imply an increase in the Sudbury population of approximately 25%. In 2003 the Sudbury Transport Study estimated the cost of a relief road at just over £20mio. With Aecom having doubted the viability of the plan and with scant information on the effects of traffic movements, it would appear that SCC have provided insufficient evidence to validate their proposal.

Sudbury will be at its limit

Is my understanding that the number of houses proposed by this development takes Sudbury to its extreme limit in terms of planning applications that can be approved before substantial infrastructure investment becomes obligatory. This will not only make Sudbury one of the most congested areas in the East of England, but substantially impact on other applications that may have more merit, but which will now have to be compulsorily refused.

Future planning applications around Sudbury will have to be refused

This is dangerous stuff as it will mean that we would need a further "massive" development to trigger any infrastructure funding. In the meantime, Sudbury will have to survive for the next 18 years with no improvements whatsoever and all and any future planning applications will have to be turned down. All for a scheme that fails to meet local needs.

On the grounds of lack of capacity, lack of proper infrastructure, substantial harm that would be done to the economy and the environment – I recommend Refusal of the planning application

Point 3 – A Woodland barrier for Chilton Airfield

All the parish councils have stated that a priority of the scheme is to ensure there is a woodland buffer between the development and the airfield. Chilton Airfield, largely owned by SCC, is considered to be a community asset and a key buffer between Sudbury and the villages of Acton and Waldingfield. The changes proposed by SCC, locates the playing-fields away from the bulk of the development to the North East, alongside the airfield. This suggests that a further expansion is envisaged across the airfield on SCC land, centered on those playing-fields.

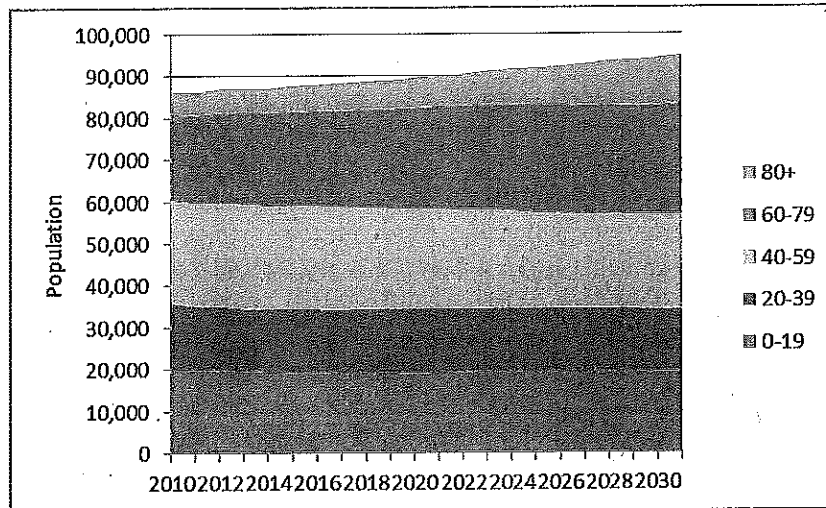
Part of the original aim of the scheme was to create a circular walk all around Sudbury. The woods to the North-East were designed to be part of that walk. This will obviously be problematic now. SCC needs to justify why the buffer has been removed and consider reinstating the woodland buffering the airfield.

I therefore recommend that conditions are attached requiring the developers to place all the public amenities at the center of the development, as they should be. Furthermore, the woodland barrier should be reinstated.

Point 4 – The Elderly

The need for accommodation for the elderly has been very heavily publicised due to our ageing population. These needs include nursing homes, sheltered housing, courtyard developments etc. It is astonishing that nothing is envisaged in this master-plan regarding types of housing.

I would suggest that studies should have been undertaken to assess these needs and the results incorporated into the plan. The ONS has some very revealing demographic data on Babergh. According to them, between 2010 and 2030, the population of Babergh will increase by 8,400. A closer look tells us that the population will actually “fall” in all age categories except for people “over 70 years old”. In the “over 80 years old” category, the population will rise by around “10-12,000”, many of whom will probably be living on their own. That is a massive change and one worth dwelling on a little further.



Logically, this means that in terms of house building, there is only one category that we need to focus on...the elderly...because demand is going to soar. Current prices for a two bedroom house in Acton around £180k. But when it comes to downsizing to say a two bedroom bungalow, the price rockets to about £230k! In other words, downsizing costs! And it costs a lot! And that's just house prices. Think for a minute what that means in terms of the services that this region will need? Currently our population contains roughly 6% of over 80 year olds. In just 15 years, that is going to be 16% - that's 1 in 6 of us! In all other age categories demand will fall or remain the same, leading organically to greater availability and better affordability.

I recommend refusal of the application on the grounds that they do not include or reflect any identified housing needs for this district.

Point 5 – Lighting and Pylons

I see no reason why the electricity cables can't be buried in a new development like this. Presumably there will be diggers all over the place, so burying a few cables shouldn't be a major expense. It may also be a valuable commodity in the future when considering other types of cabling that will be needed in this age of constant change.

There is no plan for lighting.

I note that other areas of the country, like the Cotswolds have opted for low impact LED's that instil a sense of calm and tranquility, like this scene of Stow-on-the-wold. Sadly Babergh does not have a lighting policy. However, I would suggest that because of the impact of the lighting from this development on the



surrounding rural areas that conditions are imposed to cover this eventuality.

On these grounds I recommend that conditions be imposed on the development

Point 6 – S106 monies and any other monies to be secured for community

This is a critical part of the overall development: Because of the way the project has now been structured i.e. in phases, there is no commitment during Phase 1 to build any of the community assets. Because of this, the contributions for Phase 2 and 3 should be sought during Phase 1 to cover Phase 2 and 3 or preferably the construction of those assets should be included in Phase 1. The risk of this project is that Phase 1 will take place and the community assets will not. Or that the applicant may not proceed with the next two phases at all. Or that they will come back later for a revision. In normal cases, a proportion of these funds would be held with SCC. However, as SCC is also the applicant, all monies should be held by Babergh.

It should also be noted that the schools around Sudbury are already reaching the “porta-cabin” stage. In previous responses to this issue, we were told that more porta-cabins would be provided to increase places at the existing schools. I would like to see more information on this issue to know if this has been resolved. It is not a “good deal” for the people of Sudbury to have their children educated in Porta-cabins, when SCC is receiving such a vast amount of money for its land and the development.

Finally, Chilton parish council has not been included in any S106 negotiations and no information on the plans for S106 monies have been forthcoming.

On these grounds I recommend that conditions are attached. Firstly, that the community assets are built during Phase 1. The funds to build those assets AND the land they will be built on should be transferred to Babergh, to secure their future. Secondly, I recommend that SCC guarantee there will be sufficient places at local schools without resorting to temporary structures.

Point 6 – Viability

With the scheme required to deliver 35% affordable housing and comments from previous developers saying that this was unlikely to be viable, it is concerning to note that no new information has been added regarding viability. It is my belief that this application does not sufficiently address the viability issue. As no information on viability has been provided at all, I formerly request that I receive this information as soon as possible.

On these grounds, I recommend refusal.

Point 7 – Lack of Consent and improper consultation

By general consensus, the Chilton Woods Place Shaping Group believes that it has NOT been properly consulted. Views of the group have NOT been fully taken consideration and plans for the development have proceeded as if it had not been consulted at all. The CWPSG has not been consulted on these latest modifications. The original plans on which the project was sold have changed from being desirable into something that none of the parishes want.

As such I recommend refusal due to a lack of proper and effective consultation

Point 7 – Access

The plans for access say that all construction traffic will pass through the existing residential areas of Chilton. With Phase 1 expected to last until 2024, this will put a more than considerable burden on Sudbury and Chilton and as such will be an incredibly unpopular decision. However, residents can expect traffic to continue up until 2035 when all the phases are planned to be completed. **It is NOT reasonable to expect residents to have heavy construction traffic going past their doors for 18 years!**

It should be obvious that all construction traffic should pass to the west of the site through the commercial/industrial access road and from there on the A134 to Bury St Edmunds.

On these grounds I recommend that conditions be imposed on the development

Summary

This is such an incredibly poor proposal that it beggars belief it should have got this far. Poor consultation, a fundamental rejection of the community's wishes, a rejection of the Suffolk Growth Strategy, a rejection of the New Anglia LEP's proposals, more low paid jobs, compounding of our low wage economy hence a worsening of housing affordability, 18 years of heavy construction traffic trundling through a residential area, failure to respond to key concerns, children educated in porta-cabins and no housing plans for our ageing population. This is quite simply a disaster.

But of most concern is the fact that this will blight Sudbury for generations to come. It will in effect halt all and any future development plans, leaving Sudbury even more heavily congested and reliant on an increasingly low wage economy.

As I have said before... Sudbury deserves better!

This project, instead of being the salve that would help Sudbury move forward, has turned into its worst nightmare.

As such I recommend rejection of this plan.

Furthermore, with a new local plan on the agenda, this is the perfect time to change our plans and promote growth in locations that do offer viability, without the wholesale destruction of a community.

Frank Lawrenson

I write as both a resident and as a District Councillor for the Waldingfield Ward which includes the parishes of Acton, Great Waldingfield, Little Waldingfield and Chilton, to oppose the planning application for Chilton Woods.

- My concerns on this application are far and wide.
- I have only been included (since my election as a District Councillor in 2015) in one meeting with the Chilton Woods Steering Group which I found to be chaotic, perfunctory and not in the format of a true consultation with little or no two-way listening functionality.
- I live in the village of Acton and fear for the transport network around this village from increased traffic from the proposed development using the narrow (some single track, Mills Lane in particular) roads as a "rat-run". Trying to walk along these roads, particularly Acton Lane, is, I would suggest, suicidal. Further on, outside the village along Melford Road, Acton, there are two industrial sites. Here I often walk to visit the sites and it is good fortune that I am fit enough to jump into the verge or ditch to move out of the way of busy, fast speeding and inconsiderate driving and this is without any further traffic from the proposed Chilton Woods development.
- The nearest Post Office for Acton is in Great Waldingfield which requires a walk along the road, again the traffic is dangerous.
- None of these roads mentioned have a public footpath; this has not been considered by the Chilton Woods proposal or Highways although Acton has historically requested a footpath between it and Great Waldingfield.
- The industrial area on the proposal at Chilton Woods is, I believe, deemed for the wrong type of employment or industry. We need good employment prospects to encourage our young people to stay in the area and employment of good quality. Warehousing and Distribution, I would suggest, does not do this. I believe we should be looking at a Scientific Park; a specialist industrial/employment development. However, to attract this type of employment we need better infrastructure.
- A Sudbury Relief Road is the key to any significant development such as at Chilton Woods.
- The housing development at 1,150 homes needs to be a mix of NEED rather than want. Homes for Life; Older Person homes; Professional small homes; as well as three and four bedroom homes, Community Living, etc.
- It is of concern that the existing primary schools, with this development could be swamped with new applications (assuming the area attracts young families). Currently, Great Waldingfield has, at 1st September 2017, 29 spare places; Acton has 43 spare places. Lavenham, I understand, is oversubscribed. Temporary portable classrooms, as proposed by Suffolk County Council, are not a suitable proposition for the children to fill the gap until the new primary school is built at Chilton Woods during phase 2 of the project. Incidentally where will the portable classrooms be sited? Many of the primary school sites are now overcrowded having had extensive alterations over the last two or three years to accommodate Years 5 and 6. However, what of the secondary schools? Where will any older children attend school?
- Nowhere in the proposal is there consideration for the villages that will be blighted by the transference of noise across the site towards Great Waldingfield, Acton and Newmans Green. The proposed site was commandeered for an Airfield during the Second World War, as such it was levelled and all natural environmental boundaries were removed giving a flat

topography. The proposed area needs to have an acoustic barrier surrounding it, or I would suggest, an earth embankment of sufficient height (a minimum of two metres), plus significant tree planting on top.

- What of the natural environment around the Airfield site? What will happen to that? The area is known for its nightingales and other specialised wildlife encouraged by sensitive agricultural practises. Our District is known for its environment and is often praised by visiting experts. We should be supporting it.
- My concern is also for the historical aspect of the site including the War Memorial to the USAF situated on the edge of the proposed development.
- Notwithstanding the area designated as Chilton Woods, I believe this development area to be in the wrong place. Any development should be placed towards the roads known as the Springlands/Sudbury East West Bypass and the Long Melford Bypass, west of Tesco's. Here traffic would naturally move towards the larger roads capable of taking more traffic.
- Strategically, I would suggest, this site is in the wrong place.
- Other infrastructure is groaning. Our local GP surgeries are full. Our local Hospitals struggle to cope with the load as recent NHS seasonal illness prevention guidelines issued to District Councillors to cascade to their parishes, indicates.
- Chilton as a village, historically has had a transient population. Numbers swell and decline. This could happen again if infrastructure and employment is not addressed.
- A poorly designed and built development is not what the local area or Suffolk needs.

The application submitted by Suffolk County Council is, I believe, ill-conceived and I would suggest poorly constructed with only an outline of a proposal trying to achieve acceptance of futile traffic and highway improvements.

The NPPF states that development should be sustainable. I suggest that this is not the case with Chilton Woods as per the above points and the fact that Deloitte's have never stated that this site is a viable proposition.

I have had many approaches from Ward residents against this proposal for Chilton Woods to represent their views. This I do. I oppose this development and register my objections to it.

Margaret Maybury

From: William Shropshire
Sent: 25 June 2017 08:40
To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Cc: Steven Stroud <Steven.Stroud@baberghmidsuffolk.gov.uk>
Subject: Chilton Woods Consultation

Dear Planning team,

I write in response to the consultation on Chilton Woods and would like to comment as follows:

- The infrastructure must be clearly laid out, designed to meet the needs of such a large amount of additional homes and put in place before any building of homes takes place. Springlands Way has already proven a snare and bottleneck when small issues arise, and that is with current movement numbers. An increase of potential 2,000 cars to this area will cause many issues. Added to this I am concerned that unless the infrastructure is carefully designed, traffic will be pushed out through Acton Lane, which is unsuitable and cannot sustain large numbers of traffic, but also out through Great Waldingfield and Lavenham via B1115 and B1071 which already has major issues with traffic.
- In Addition to the above general traffic issues, Site Management Plan should ensure that works traffic use direct trunk routes and not surrounding villages, particularly protecting Lavenham which already has to deal with HGV's and large vehicles damaging the village.
- Whilst I have raised the question of why there is a delay in the building of the primary school and received a response previously, I do not accept that the reasoning. We cannot afford to have 1,000+ new homes, mainly designed for young families, without rectifying the pressures on places at local schools. In my opinion the building of the school should be a priority, in phase 1 and a pre-requisite of planning permission.
- Affordable housing is not being built to the numbers it needs to be. Greater pressure is put on families and the younger generation. Therefore as a minimum 35% of planned properties on the site should be affordable housing.
- The original Chilton Woods plan had a large green belt circumventing the northern edge, to ensure a definitive break between the villages of Newmans Green, Acton and Waldingfield and the new development. This should be a pre-requisite of planning permission and planting should happen at the inception of the works, to allow it to develop whilst the building works are carried out.
- It has been found that within Suffolk previous large developments have promised the provision of community facilities, sports grounds, doctors surgeries etc., and developers have failed to deliver once houses have been built. We should be careful to ensure that the planning permission and any agreement with developers penalise them for failure to deliver the community aspects of the development and penalise them if they fail to hit timelines for providing such facilities.
- Personally I also feel that the development would be better placed slightly further the west, i.e. stretching down to the junction of the A134 and A131 – this would be a better location to sustain the increased traffic movements and provide better links towards the main trunk routes South (towards Braintree), North (towards Bury St Eds) and West (towards Haverhill).

With kind regards

William Shropshire

Babergh District Councillor – Lavenham Ward

Vice Chairman Babergh & Mid Suffolk Joint Audit and Standards Committee

Babergh District Council

Council Offices, Corks Lane, Hadleigh, IPSWICH IP7 6SJ

www.babergh.gov.uk



Your Ref: B/15/01718/OUT
Our Ref: 570\CON\0266\16
Date: 8 April 2016
Highways Enquiries to: colin.bird@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: Planning.Control@babberghmidsuffolk.gov.uk

The Planning Officer
Babergh District Council
Council Offices
Corks Lane
Hadleigh
Ipswich
Suffolk
IP7 6SJ

For the Attention of: Ben Elvin

Dear Ben

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN B/15/01718/OUT**

PROPOSAL: Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

LOCATION: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury, Suffolk

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority make the following comments:

The application is for consideration of access only but further information is required, as detailed below, before we can conclude the development complies with the NPPF paragraph 32 with regard to

- the opportunities for sustainable transport,

- safe and suitable access to the site and
- that the residual impacts of the development are not severe

Scope

SCC provided pre-application scoping advice to the developer, including a study area within which full junction assessment would be required. Further issues have been raised during consultation to highlight local junctions where concerns have been raised outside of this study area. The initial scoping advice included a statement that any junction significantly affected by the development must be assessed within the TA so that the appropriate mitigation can be determined.

We require further consideration of the additional junctions raised during the consultation, including the Bull Lane junction on the A134 Long Melford Bypass and the junction between Valley Road/A134, unless the TA can demonstrate they are not significantly affected.

The scoping advice included consideration of the assessment year. The initial discussions were carried out when the application was intended to be submitted in 2014. The Department for Transport Guidance on Transport Assessments (guidance subsequently withdrawn) recommends that the assessment year is five years after registration of the planning application. Due to the size and strategic effects of the development we required an extended 10 year period and the assessment year was set as 2024. Subsequently, the application was delayed and the build out period was extended beyond the assessment year. The TA models scenarios based upon the full development being implemented by 2024 and this is still considered an acceptable basis to assess the effects and necessary mitigation.

Transport Assessment

Our consultants, AECOM, have provided technical comments on the TA which set out some areas where further work is required. Their Technical Note is submitted separately.

It is likely that some of the discrepancies about the trip rates could be covered by further sensitivity testing so that the Highway Authority can be satisfied that the TA is a robust assessment and that appropriate mitigation is identified.

The accident data is based upon the five year period 2009-2013 inclusive. Given the delay since initial scoping a further two years of accident data is available for 2014 and 2015. A review of this more recent data should be carried out to ensure the TA is still valid.

It is not clear how the traffic effects of the Household Waste site have been considered.

Although AECOM agree that vehicle trips generated by the school need not be included in the assessment of the full development this depends upon phasing. The indicative proposed phasing delivers the school in phase 2 which would result in up to 500 homes being delivered and using existing schools off-site, which could include Acton and Great Waldingfield. These traffic effects need to be taken into consideration

With regard to mitigation there are concerns about some of the detail of proposed improvements. While the process to implement any highway mitigation will incorporate design checks and safety audits, when appropriate, we cannot guarantee an acceptable scheme can be provided at this stage. Particular concerns are pedestrian safety at the following sites

Junction 6
Junction 8b
Junction 12b

The emphasis of the TA is to resolve any highway capacity issues. However, this cannot be at the expense of safety for any non-motorised road users.

The TA does not consider the effect on the Belle Vue junction because separate work is being undertaken by SCC to assess necessary improvements. However, as yet this issue remains unresolved.

With regard to Acton Lane, although the principles of the scheme are acceptable the detail as shown falls short of providing a good quality sustainable access to the site. As with the mitigation schemes more detailed design is required to ensure a deliverable scheme is possible before approval can be given.

The TA does not require signalisation of Acton Lane as mitigation until Phase 2 but SCC will require this scheme at an earlier stage to provide pedestrian facilities and the ability to implement some controls on traffic flows and bus priority.

In general the phasing of mitigation is unsatisfactory as several improvements are programmed after the problem has developed, whereas we will require mitigation to be implemented prior to this to prevent the impact from occurring.

Sustainable Links

SCC considers that the footbridges across Springlands cause an element of severance to non-motorised users which are likely to encourage car use. Although most of the footbridges have been improved by SCC some of the access ramps are poor with regard to the gradients, turning areas and widths and do not comply with the appropriate standards.

Some limited improvements are proposed where the ramps meet the highway network but further improvements are needed to ensure any severance is minimised on the major desire lines. In addition SCC have previously identified various off-site improvements which will increase the likelihood of walking and cycling. These improvements will be secured by S106 contributions which have yet to be detailed but will follow in due course.

In addition, funds will be required to improve the bus provision to the site in accordance with details and costs yet to be agreed.

S106 summary

We are awaiting full consideration of the S106 contributions for Rights of Way improvements, Public Transport and off site sustainable mitigation which will follow in due course.

However, the sum of £943,013 will be required for Travel Plan measures and a details breakdown is given below.

Yours sincerely,

Mr Colin Bird
Development Management Engineer
Strategic Development – Resource Management

TRAVEL PLAN COMMENTS

I have had a chance to review the Framework Travel Plan (dated December 2015) that was submitted to support the application (B/15/01718/OUT) for the proposed mixed-use major development at Chilton Woods in Sudbury. I have had a chance to review this travel plan and I would like to make the following comments. The travel plan does identify some decent hard measures and has a strong commitment to engage with the residents on the site. However the travel plan does need to include further softer measures to encourage the use of the hard travel plan measures that are being provided, in addition to including how the commercial travel plan will be successfully implemented. The travel plan is also detached from the proposed highway mitigation identified in the supporting Transport Assessment. This goes against the overarching principles of Travel Plans and Transport Assessments in the 2014 Planning Practice Guidance. There is also only a commitment to reduce single occupancy vehicle travel by 5% which is very unambitious considering the improvements to sustainable transport infrastructure proposed by this development. DfT Guidance "Making Residential Travel Plans Work" suggests a Residential Travel Plan should be able to achieve a 11-21% modal shift. Therefore the modal shift target must be revised accordingly in both the Travel Plan and Transport Assessment.

Alternative trip-rate based targets linked to the travel plan, could also be considered with further discussions between the applicant and the highway authority to agree the target trip-rate.

There is also very little reference to how the impact of the employment aspect of the development will be mitigated, as the travel plan states that there will be 2,125 jobs created by the commercial development. When completed this is very likely to have an impact on the local highway infrastructure if all staff have limited options to travel to the site by alternatives to single-occupancy vehicle. Strong objectives, targets and measures, such as committing to high quality long-stay cycle parking and public transport waiting facilities should be included in a separate Workplace Travel Plan.

More detailed interim baseline data needs to be included to understand the commuting habits of the residents that currently live within the Chilton area of Sudbury. This "Origin-destination" for the relevant middle layer data can be obtained from the Nomis or <http://commute.datashine.org.uk/> websites to help understand where the existing residents currently travel to work, and by what mode of travel.

In regards to the provision of softer measures, there is limited reference to the provision of multi-modal vouchers to each dwelling to encourage residents to use the new bus services and cycle infrastructure that is being delivered for this development. At least two one month bus season tickets (ideally in a smart card multiple journey format) should be provided to each dwelling in an attempt to get the residents regularly using the new bus services that are being funded by the development. If the bus services are not being used by residents and employees these services may be reduced, or withdrawn, which is likely to result in an increase of vehicular journeys to fill in the gaps between the lack of bus services. If the resident does not wish to redeem a bus voucher, a cycle voucher of equivalent value should be offered instead. There is no off-site travel plan measures identified, such as a smarter choices scheme. Travel planning over the wider area is encouraged by the 2014 Planning Practice guidance and should therefore be incorporated in this travel plan in the format of a smarter choices scheme across the existing developments in close proximity to the proposed development. The purpose of the smarter choices scheme is to reduce the number of 'trips' that are made by the existing residents on the existing highway infrastructure that will be shared with the proposed development. The scheme will involve the provision of travel information packs, cycle vouchers, bus vouchers and personalised travel planning. This scheme will need to be monitored to see if modal shift has been achieved following on from the initial contact with the existing residents. In regards to the car club discussions there was no reference to any discussions with Co-wheels, who are due to start operating a car club in Suffolk in the next few months. Having spoken to the car club operator in the past, the thresholds for the development for this development would make it viable for them to operate a car club on the site. Nevertheless they may require a developer contribution to help pump-prime the car club. Further evidence of the discussions with Co-wheels and the outcomes will need to be provided in the travel plan.

For the implementation of the Workplace Travel Plan, there must be a commitment to set up a Transport Management Association, or Travel Plan Steering Group shortly after occupation of the commercial development. This group will be required to coordinate the travel plan across all workplace developments to ensure there is no duplication between the individual unit's travel plan and the site-wide travel plan. The cost of establishing this group must initially be funded by the developer, however these costs can be recovered through the rents of the individual occupiers.

The monitoring of the travel plan will need to be revised to reflect the phasing and build-out of the full development, which may take up to 25 years if the average annual occupation (approximately 40-50 dwellings per annum according to sold house prices statistics) of new developments in Suffolk applies to this development. The baseline monitoring must commence on occupation of the 100th dwelling and then monitored annually until the final dwelling is occupied. If the targets are not achieved the travel plan implementation period will be extended, with remedial measures implemented to help achieve these agreed targets.

Other issues in regards to the travel plan include some resistance to the payment of the Travel Plan Evaluation and Support contribution on the basis of the Oxfordshire High Court decision. This contribution is essential to allowing SCC sufficient resource to engage with the Travel Plan Coordinator and Babergh in regards to the ongoing implementation with the travel plan. If no contribution is provided it is highly unlikely that SCC can provide any travel plan engagement, which is likely to result in the failure of the travel plan and the highway mitigation. I have had some confirmation from the Planning Inspectorate that the Oxfordshire decision does not affect the request for travel plan monitoring contributions. This correspondence can be provided on request of the applicant. Finally I have noticed that Section 3 of the travel plan is missing. This will need to be included in a revised travel plan.

I would require the applicant to submit a revised residential travel plan and workplace travel plan for approval prior to the determination of this application.

The requirement for a Travel Plan is supported by National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Other relevant paragraphs include 34, 35, 36, 37 and 38.

In addition, a decent quality travel plan will also support Core Policies CS12, CS13, CS14, CS15 and CS21 of the Babergh Core Strategy (2011-2031).

I would also require the following Section 106 contributions to assist the delivery of the travel plan:

- Travel Plan Evaluation and Support Contribution - £1,000 per annum until one year have passed after completion of the whole (both residential and commercial) development (estimated at £25,000 based on estimated build out). This is to cover Suffolk County Council officer time working with the site-wide Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan
- Travel Plan Implementation Bond to cover the full residential element of the development (1100 dwellings) in the event that the developer fails to implement the travel plan – £943,013 (£857 per dwelling) this is based on the workings out in the table below:

Travel Plan Co-ordinator	£607,950
Car Club Car and Membership	£88,500
Website for Development	£26,000
Multi-modal voucher	£110,000
Survey incentives	£2,400
Green Travel Maps	£4,700
Design and printing of RTP	£5,750
Personalised Travel Plans	£20,213
Travel Notice Board	£1,000
Travel Notice Board Content	£4,500
Monitoring (inc traffic counts, survey subscription)	£72,000
Total	£943,013

I would also require the following Section 106 obligations:

- Implementation of the Residential Travel Plan

- *Implementation of the Workplace Travel Plan*
- *Implementation of a Transport Management Association, or Travel Plan Management group to ensure the travel plan is jointly coordinated across the residential site and all occupiers on the commercial site*
- *Provision of at least two Car Club vehicles on the site*
- *Provision of electric vehicle charging infrastructure*
- *Provision of an approved welcome pack to each new employee and residential dwelling on occupation*
- *Smarter Choices scheme for residents and workplaces located close to the development to further mitigate traffic impact*

The following planning conditions should be used to secure the following as part of this application:

- *The School Travel Plan to be submitted, approved and implemented when triggered*
- *The requirement for all individual commercial units to comply with site-wide travel plan (when site-wide travel plan is formally approved) when submitting their individual applications at a later stage of development*

Full wording and confirmation on how the contributions, planning obligations and planning conditions comply with CIL can be provided by myself on request at a later date.

Further detailed comments in regards to the content of the travel plan can be provided on request from the applicant.

Your Ref: B/15/01718/OUT
Our Ref: 570\CON\1783\17
Date: 27 June 2017
Highways Enquiries to: colin.bird@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: Planning.Control@baberghmidsuffolk.gov.uk

The Planning Officer
Babergh District Council
Council Offices
Corks Lane
Ipswich
Suffolk
IP7 6SJ

For the Attention of: Ben Elvin

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN B/15/01718/OUT

- PROPOSAL:** Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.
- LOCATION:** Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury, Suffolk

Dear Ben,

Further to my previous response dated 8 April 2016 we have received additional information from the applicant and have considered the issues in more detail.

Scope

The applicant has provided additional information relating to the effect of the development on the junction between the A134 and Valley Road. This information shows a satisfactory scheme to mitigate the effects of the development can be provided within the highway land available subject to detailed design and consideration of a safety audit

The junction between Bull Lane and the A134 Long Melford Bypass was also raised, particularly in terms of road safety. The applicant provided a Technical Note review of crashes throughout the study area

which indicates that under current traffic conditions the frequency of crashes at this junction is not significant enough to warrant mitigation.

Transport Assessment

The issues raised by our consultants, AECOM, have been partially covered by additional information considering the mitigation in more detail in further Technical Notes and by an updated analysis of the accident data. Discrepancies in the trip rates are unlikely to result in a significant change to the traffic effects on the local highway network. Some issues with the Technical Notes have been considered in detail but it is concluded that they provide a reasonable analysis of the capacity of the proposed mitigation

There is no separate consideration of the safety of the proposed mitigation but this issue will be dealt with by the detailed design process. The applicant has stated that Stage 1 Road Safety Audits will be provided before the date of the committee meeting.

With regard to the effects on the Belle Vue Junction this has been considered in a separate report for Suffolk County Council with regard to possible improvement schemes. This analysis included consideration of the increased traffic from Chilton Woods as part the background growth but did not separately analyse the effects so that the effect of Chilton Woods could be isolated. However, the report concluded that the proposed improvement schemes offered no benefits and there is no current approved scheme to increase capacity at this junction to allow for additional growth. Therefore, we are not asking for mitigation at this junction but will be seeking high quality sustainable links between the development and the town centre in the form of improved bus infrastructure and improved service and better walking and cycling links to minimise the impact.

Western Access

Provision of the western access at the earliest opportunity will relieve traffic congestion at the junctions at the eastern end of Springlands and by triggering provision of the commercial development would encourage internal trips which would reduce pressure on the external network. However, the modelling assessment and proposed mitigation is satisfactory to allow consideration of the effects of provision of the residential development with no western access.

Sustainable Links

Further to my previous response we have included a requirement for improvements to the pedestrian cycle links between the site and the town centre and public transport improvements in the S106 requirements below to minimise the impact of the development on the highway network.

S106 requirements

Travel Plan

Travel Plan Evaluation and Support Contribution	= min £5000
Travel Plan Bond or cash deposit	= £943,013

Details of the travel plan requirements are given below. Alternative methods of financing these requirements will be considered.

Public Rights of Way

Total = £225,340

Details of the breakdown of these costs are given below.

Toucan Crossings

These are required to provide safe routes for sustainable routes both for trips generated by the new development and to allow existing movements across roads such as Aubrey Drive which will have significantly increased flows.

The Toucan crossings are required at 3 locations:

Aubrey Drive at the existing refuge south of Reynolds Way
Waldingfield Road between Aubrey Drive and Springlands roundabout
Northern Road east of Waldingfield Road

Cost is £75,000 per crossing

Total cost = £225,000

Town Centre Bus Infrastructure

The existing bus station does not have capacity for the additional services which will be needed to provide satisfactory sustainable bus links to the development. The provision of a new bus station is the only option to cater for this growth because of constraints at the existing site. Therefore, we are seeking a contribution to a new bus station and the contribution is based upon the importance of encouraging bus use by the new development.

Contribution sought = £250,000

Bus Service Contribution

A contribution is required to serve the new development enabling sustainable travel between it and the nearest bus interchange, also giving access to the nearest supermarket and employment areas. The request is to achieve a 30 minute frequency to achieve modal shift based upon the provision of one new bus.

Total cost = £600,000

RTPI Screens

Required to provide better information on the service.

Cost per screen = £10000

Minimum no. required 6 no.

Total Cost = £ 60,000

Pedestrian/Cycle Improvements

The existing pedestrian and cycle links between the site and the nearest schools and town centre facilities are substandard with no formal cycle routes. These require improvement to encourage sustainable travel. The proposed measures target key desire lines.

Approximate cost based on a preliminary estimate £130,000

I consider the above S106 requirements are CIL compliant and necessary to make the development acceptable. Further details of the requirements can be provided prior to preparation of the completed S106 agreement.

Please find below the Rights of Way and Access (ROW&A) response in respect of the above application. This has been made on the information supplied to date and is without prejudice to any further comments this service may wish to submit. The county council notes there is currently a lack of detail on the widths and surface type of both the recorded Public Rights of Way (PROW) through the site and the proposed interconnecting pedestrian and cycling facilities. Further information is required on which routes are to form pedestrian or cycling links and how the Community Woodland path is to link to the recorded PROW network – it is anticipated this information will be provided as part of any future reserved matters applications, should planning consent be granted for this outline application. From the information contained on the illustrative masterplan, the county council has identified the need for both onsite and offsite PROW improvements. These are detailed below and should be read in conjunction with the attached PROW plans (one depicting the recorded PROW in relation to the masterplan, the other highlighting the sections that will require diversion or creation). The application site covers parts of the

parishes of Sudbury, Chilton, Long Melford and Acton. Some sections of the same linear PROW are therefore recorded in different parishes and attributed different parish/path references. All distances are approximate.

The following policy framework is relevant to the application:

- The county council's rights of way improvement plan which, inter alia, highlights the importance of development in rural areas giving people the greatest opportunity to access the countryside by walking and cycling,
- The walking strategy which seeks to ensure existing communities with a population over 500, and new developments over 10 dwellings have easy access to a one mile natural walk or 2ha of green space, within 500m of their home,
- The county council's Cycling Strategy, which as part of its aims seeks to promote a transfer to cycling (and walking) for short distance trips, supporting Suffolk's 'Creating the Greenest County' ambitions and encourage cycling across all sectors of the community, supporting Suffolk's 'Most Active County' ambitions,
- The Joint Health and Wellbeing Strategy for Suffolk, outcome 2 of which states Suffolk residents should have access to a healthy environment and take responsibility for their own health and wellbeing,
- You will already be aware of course that, amongst other health and wellbeing objectives, paragraph 75 of the National Planning Policy Framework (NPPF) states planning policies should protect and enhance public rights of way and access and local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks."

PROW Improvements

In order to facilitate safe and convenient cycling links within the development and outside of it, to connect with the villages of Acton and Great Waldingfield, the county council seeks the widening and upgrading of a number of routes to bridleway status. Where there are practical difficulties achieving this on the ground, some remedial works and PROW diversions are required. Where these bridleway upgrades fall within council owned land, we request these sections are dedicated as such. Where upgrades are sought on third party land, these will need to be achieved by way of orders/agreements, using the appropriate order making powers. It is suggested these changes be delivered by way of an agreed package, in order to reduce order making costs and potential compensation on third party land. Some new and improved path furniture will also be needed. All of the above will need to be the subject of further detailed discussion with the ROW&A service.

Onsite and Offsite

Long Melford Bridleway 32 – Route to be diverted onto a track forming part of the green corridor on the western edge of the site. To reconnect to the existing bridleway at the north western corner of the site.

Sudbury Footpath 9/ Chilton FP 10/Acton FP 8 - the majority of FP9 Sudbury is recorded alongside a wooded watercourse and its width is constrained by the bank on one side and residential property fencing the other. There are locations where the available width is only 1 metre. Revetment works will be required for these sections, in order to provide a 2 metre wide route throughout. The cost of these earth works are currently unknown and will require scoping. Approximately 130 metres north of its commencement with Glenville Road, close to where the path crosses the watercourse by way of a wooden footbridge, the path's width is again limited to 1 metre, due to property boundary fencing. A short diversion south of this pinch point is needed and a new replacement bridleway standard bridge required. Once on the western side of the watercourse, with clearance works, a 2 metre wide route is available alongside the industrial site security fencing. At the point where FP9 enters the development site boundary (approximately 90m north of the existing footbridge), two large electricity poles obstruct the route, significantly limiting the available width. Further information is required on how this obstruction is to be addressed.

North of this point, a 3 metre wide route is available all the way up to the junction with the U8221. A diversion of the northernmost 440 metres of Acton FP8 is needed to take the footpath out of the horse paddocks and re-route onto the hard track to the east of Rose Cottage – this section does not require surface improvement.

The whole of the above route to be upgraded to bridleway status, with an unsealed, all weather surface.
Surfacing cost = £67,375
Clearance works = £1K
New BR bridge = £4000
Revetment works = Unknown

Acton FP16 – to be upgraded to bridleway, 2m wide, 200m in distance (northern half), 3m wide 200m distance (southern half). To have an unsealed, all weather surface. Surfacing cost = £25,000.

Acton FP15 – to be upgraded to bridleway, 3m wide 327m in distance. To have an unsealed, all weather surface. Surfacing cost = £24,525.

Acton FP13 (part) - to be upgraded to bridleway 3m wide 100m in distance. To have an unsealed, all weather surface. Surfacing cost = £7,500k.

Disused airfield site FP1 Chilton (Part) and FP13 Acton (Part) – to be upgraded to bridleway 3m in width. Patching works = £12,880 New bridleway in Acton and Chilton to connect between FP1 in Chilton and FP13 in Acton to 3m width.

Disused airfield site - FP12 & Chilton and FP21 (Part) Acton - to be upgraded to bridleway 3m in width. A bridleway creation link from Chilton FP12 west to Acton Lane is required. Patching works = £34,720. New bridleway in Acton and Chilton to connect between FP1 in Chilton and FP13 in Acton to 3m width. A bridleway creation link from Chilton FP12 west to Acton Lane is required.
Costs Summary (NB costings are approximate)

Surfacing = £172,000.00
Design & Staff time @ 12% = £20,640.00
Contingency @ 10% of total cost = £17,200.00
Order making & potential compensation = £10K
Bridges = £4000
Vegetation clearance = £1K
New signing/waymarking = £500

Total = £225,340 *Excluding revetment work costings

Travel Plan

The Travel Plan will still need to be revised in accordance with the comments provided in the Suffolk County Council Highway Response dated 8th April 2016. However, these revisions can be made at a later date, provided there is a suitable pre-commencement planning condition agreed to ensure that a fully compliant Framework Travel Plan has been submitted and approved prior to the commencement of any part of the development, to ensure that there is suitable sustainable transport highway mitigation for the development.

To ensure that the Travel Plan will be implemented and the Highway Authority are appropriately resourced to oversee the implementation of the Travel Plan the following Section 106 contributions are required:

- **Travel Plan Evaluation and Support Contribution** - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest.
 - This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.

- **Travel Plan Implementation Bond, or cash deposit** - £943,013 (£857 per dwelling per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan).
 - This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves. A rolling bond, one-off Travel Plan Contribution for SCC to deliver the Travel Plan on behalf of the applicant, or any other suitable obligations to guarantee Travel Plan implementation may also be considered.

Also the following Section 106 obligations are required to ensure that the Travel Plan is implemented in full:

- Submission and implementation of an Interim Residential Travel Plan
- Submission and implementation of an Interim Workplace Travel Plan
- Implementation
 - of a Transport Management Association, or Travel Plan Management group to ensure the travel plan is jointly coordinated across the residential site and all occupiers on the commercial site
- Monitoring the Residential Travel Plan on occupation of the 100th dwelling
- Monitoring the Workplace Travel Plan six months after occupation of the first commercial unit
- Submission and implementation of a Full Residential Travel Plan on occupation of the 100th dwelling
- Submission and implementation of a Full Workplace Travel Plan after occupation of the first commercial unit
- Implementing and monitoring the Full Residential Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Implementing and monitoring the Full Workplace Travel Plan until five years have passed after occupation of the final commercial unit
- Implementation of remedial measures if the agreed vehicular trip rates are exceeded, or if agreed targets for the Residential and Workplace Travel Plans are not achieved
- Provision of an approved welcome pack to each new employee and residential dwelling on occupation
- Implementation of a one-off Smarter Choices scheme for residents and workplaces located close to the development to further mitigate traffic impact from the development

The requirement for a Travel Plan is supported by National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Other relevant paragraphs include 34, 35, 36 and 37 as well as the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance.

In addition, a decent quality travel plan will also support Policies CS4, & CS15 of the Babergh Local Plan 2011-2031 - Core Strategy & Policies

All the contributions and obligations have taken into account CIL regulation 122 and are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Full wording and evidence of CIL compliance for the proposed Section 106 obligations can be supplied at a later date if planning permission is granted.

Summary

We have considered the effect of the development on the local highway network. We consider the residual impact will result in a severe impact if no mitigation is provided. The developer has provided appropriate

measures which would satisfactorily address these concerns subject to addressing the detailed design of the proposed highway improvements. Also a robust set of sustainable measures must be provided to mitigate the impact which form the basis for our S106 requirements.

Provided acceptable mitigation is secured by condition and S106 contributions we conclude this development would not result in a severe residual impact and, therefore, do not object.

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

1.

Condition: Before the development is commenced details of the proposed junction improvement at the junction between the A134 and Valley Road shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety prior to occupation of the 100th dwelling.

Reason: In the interest of highway safety.

2

Condition: Before the development is commenced details of the proposed improvement at the junction between Aubrey Drive and Waldingfield Road shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety prior to occupation of the 100th dwelling.

Reason: In the interest of highway safety.

3

Condition: Before the development is commenced details of the proposed signalisation of the junction between Acton Lane and Springlands including provision of a signalised crossing on Springlands shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety prior to occupation of the 100th dwelling.

Reason: In the interest of highway safety.

4

Condition: Before the development is commenced details of the proposed new junction between the western access and the A134 shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety prior to occupation of any of the commercial development directly served off this access.

Reason: In the interest of highway safety.

5

Condition: Before the development is commenced details of the proposed off-site mitigation measures at the following junctions Newton Road/Shawlands Avenue, A131 Girling Street/A131 Melford Road, A131 Gainsborough Street/A131 Stour Street shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety prior to occupation of the 300th dwelling.

Reason: In the interest of highway safety.

6

Condition: Before the development is commenced details of the proposed pedestrian and cycle connectivity improvement measures as set out in section 6.7 of the Transport Assessment shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety prior to occupation of the 100th dwelling.

Reason: In the interest of highway safety.

7

Condition: Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

8

Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

9

Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

10

Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

11

Condition: The new estate road junction(s) with Aubrey Drive, Acton Lane and the A134 inclusive of cleared land within the sight splays to this junction must be formed prior to any other works commencing or delivery of any other materials.

Reason: To ensure a safe access to the site is provided before other works and to facilitate off street parking for site workers in the interests of highway safety.

12

Condition: All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

13

Condition: Prior to the commencement of the development, the Framework Travel Plan (dated December 2015) that was submitted to support the application must be revised in accordance with the Highway Authority Comments (dated 8th April 2016) for approval by the Local Planning Authority.

Reason: In the interests of sustainable development as set out in the NPPF, and Policies CS4, & CS15 of the Babergh Local Plan 2011-2031 - Core Strategy & Policies

14

Condition: Before the development is commenced details of the areas to be provided in the commercial development for secure covered cycle storage for both customers and employees and details of changing facilities including storage lockers and showers shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: In the interests of sustainable development as set out in the NPPF, and Policies CS4, & CS15 of the Babergh Local Plan 2011-2031 - Core Strategy & Policies

15

Condition: Before the development hereby permitted is occupied full details of the electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and paragraph 35 of the National Planning Policy Framework.

16

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense.

The County Council's Central Area Manager must be contacted on Telephone: 01473 341414. Further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/> A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

17

Note: The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

18

Note: The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

19

Note: The Framework Travel Plan must identify and provide detail on a long-term sustainable transport strategy to encourage residents and employees to travel sustainably to reduce the vehicular impact on the local highway network.

20

Note: The employee cycle storage shall be in a lockable facility away from public access to maximise the uptake in cycling among employees.

Yours sincerely,

Mr Colin Bird
Development Management Engineer
Strategic Development – Resource Management

Your Ref: B/15/01718/OUT
Our Ref: 570\CON\1783\17
Date: 31 August 2017
Highways Enquiries to: colin.bird@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: Planning.Control@babberghmidsuffolk.gov.uk

The Planning Officer
Babergh District Council
Council Offices
Cork's Lane
Ipswich
Suffolk
IP7 6SJ

For the Attention of: Steven Stroud

Dear Steven

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN B/15/01718/OUT

PROPOSAL: Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

LOCATION: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury, Suffolk

Further to our previous response, dated 27 June, I wish to provide further comments to clarify our position.

Access

The five proposed access points, to be considered as part of the current application (shown on Figure 3.1 – Land Use Parameter Plan), are acceptable to provide means of access to the proposed development. Matters of detail design will be approved as part of the S278 Agreement process required to allow the developer permission to carry out the necessary works on the public highway.

Transport Assessment

The applicant has provided further technical notes addressing issues raised in our previous response. These include an update of the accident data, an assessment of proposed mitigation at the Valley Road/A134 junction, revised mitigation of the Waldingfield Road roundabout and bus routeing.

We engaged our consultant, AECOM, to provide further assessment of the traffic modelling included in the additional documents. Their draft response was sent to the applicant who responded with further information. This process was not concluded by the end of the consultation period and, therefore, we took a view on the adequacy of the Transport Assessment with the information available at the time we were required to respond

The view taken by Suffolk County Council as Highway Authority is that the Transport Assessment, together with the additional information provided to the Local Planning Authority is satisfactory to determine the application regarding the effect on the highway.

Further discussions with the applicant have continued regarding details of the mitigation required. These discussions do not affect the conclusions of our previous response. However, they will ensure the wording of appropriate conditions and obligations can be finalised in accordance with the requirements of the Highway Authority, should the Planning Committee decide to grant permission.

Mr Colin Bird
Development Management Engineer
Strategic Development



Developments Affecting Trunk Roads and Special Roads
Highways England Planning Response (HEPR 16-01)
Formal Recommendation to an Application for Planning Permission

From: Catherine Brookes
Network Delivery and Development
East Region
Highways England.
planningee@highwaysengland.co.uk

To: Babergh District Council

CC: transportplanning@dft.gsi.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: B/15/01718/OUT

Referring to the planning application referenced above, dated 26 January 2016, application (with all matters reserved except for access) – erection of up to 1,100 dwellings (Use Class C3), Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury, notice is hereby given that Highways England's formal recommendation is that we:


- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B ~~is~~ is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via transportplanning@dft.gsi.gov.uk.

Signature: 	Date: 15 February 2016
Name: David Abbott	Position: Asset Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
david.abbott@highwaysengland.co.uk	

Matt Moody

From: Adkins, Connor <Connor.Adkins@highwaysengland.co.uk>
Sent: 15 February 2016 10:59
To: Planning Emails
Cc: 'transportplanning@dft.gsi.gov.uk'; growthandplanning
Subject: planning application B/15/01718/OUT
Attachments: B-15-01718-OUT Rec.pdf

Importance: High

Dear Sir/Madam

The proposed development is likely to have some impacts on the A12 at Braintree and Colchester and the A14 at Bury St Edmunds and Ipswich. However these are unlikely to be severe. We therefore offer no objection in this case.

Yours Faithfully
Connor Adkins

Connor Adkins

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: +44 (0) 300 4704744
Web: <http://www.highways.gov.uk>
GTN: 0300 470 4744

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.



Developments Affecting Trunk Roads and Special Roads
Highways England Planning Response (HEPR 16-01)
Formal Recommendation to an Application for Planning Permission

From: Martin Fellows
Operations (East)
planningee@highwaysengland.co.uk

To: Babergh District Council

CC: growthandplanning@highwaysengland.co.uk


Council's Reference: B/15/01718/OUT

Referring to the planning application referenced above, dated 22 May 2017, application for the erection of up to 1,150 dwellings; 15ha of employment development; village centre; creation of new vehicular access points and associated works, Chilton Woods Mixed Use Development, Land North of, Woodhall, Business Park, Sudbury, notice is hereby given that Highways England's formal recommendation is that we:

- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is ~~is~~ not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

Signature: 	Date: 25 May 2017
Name: pp. David Abbott	Position: Asset Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
david.abbott@highwaysengland.co.uk	

Subject:FW: planning application B/15/01718/OUT
Importance:High

From: Adkins, Connor
Sent: 27 September 2017 14:15
To: planning.reception@babergh.gov.uk
Cc: growthandplanning
Subject: planning application B/15/01718/OUT
Importance: High

Dear Sir/Madam

The changes to this application resulting from the new information have little or no bearing on our views on this proposal. In this instance therefore our earlier recommendation issued on 25 May 2017 may remain unchanged.

Yours Faithfully

Connor Adkins

Connor Adkins

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: +44 (0) 300 4704744
Web: <http://www.highways.gov.uk>
GTN: 0300 470 4744

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32

1AF | <https://www.gov.uk/government/organisations/highways-england> |
info@highwaysengland.co.uk

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1
Walnut Tree Close, Guildford, Surrey GU1 4LZ*

Consider the environment. Please don't print this e-mail unless you really need to.



Environment
Agency

FAO: Ben Elvin
Babergh District Council
Development Control
Council Offices Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Our ref: AE/2016/120074/01-L01
Your ref: B/15/01718/OUT
Date: 16 February 2016

Dear Mr Elvin

UP TO 1,100 DWELLINGS (USE CLASS C3); 16.4HA OF EMPLOYMENT DEVELOPMENT (TO INCLUDE B1, B2 AND B8 USES, A HOTEL (C1), A HOUSEHOLD WASTE RECYCLING CENTRE (SUI GENERIS) AND A DISTRICT HEATING NETWORK); VILLAGE CENTRE COMPRISING UP TO 1,000M2 GROSS FLOOR AREA (GFA) OF RETAIL FLOOR SPACE (A1, A2, A3, A4 AND A5), VILLAGE HALL (D2), WORKSPACE (B1A), RESIDENTIAL DWELLINGS (C3), PRIMARY SCHOOL (D1), PRE-SCHOOL (D1) AND CAR PARKING; NEW POINTS OF VEHICULAR ACCESS AND ASSOCIATED WORKS; SUSTAINABLE TRANSPORT LINKS; COMMUNITY WOODLAND; OPEN SPACE (INCLUDING CHILDREN'S PLAY AREAS); SUSTAINABLE DRAINAGE (SUDS); SPORTS PAVILION (D2) AND PLAYING FIELDS; ALLOTMENTS; AND ASSOCIATED ANCILLARY WORKS. CHILTON WOODS, LAND NORTH OF WOODHALL BUSINESS PARK, SUDBURY.

Thank you for consulting us on this application, received on 27 January 2016.

We have reviewed the proposals and have no objections but we have provided advice on the following in our letter we should be considered before the application is determined:

- The sensitivity of groundwater at this location. We've requested conditions to ensure the proposed development doesn't impact upon it;
- The potential for previous uses of the site to cause pollution to groundwater. We've requested conditions to ensure further information is submitted before the commencement of development;
- The proximity of the development to a permitted facility and the impacts this could have on those living and working at the new development;
- The need for the proposed Recycling Centre to obtain an Environmental Permit from us;
- The need to check there is capacity for a development of this scale in the foul water system;
- Good practice to create a sustainable development which minimises its impact on the environment.

Environment Agency
Cobham Road, Ipswich, Suffolk, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..



Groundwater Protection

The site is located on principal aquifer. Part of the site is also situated within Source Protection Zone 1 and the majority of the remaining area is in a Source Protection Zone 2; these zones are designed to safeguard drinking water sources. Given the high sensitivity of groundwater in this location we have requested some conditions to control certain activities on the site. We have also provided advice which the applicant should refer to when developing the reserved matters application:

Surface water management

The submitted information advises the preferred method of surface water management is via a treatment train then discharge to surface water. Should infiltration drainage be proposed, including consideration of deep bore soakaways, then further assessment would be required. We therefore request the following condition is appended to any planning permission granted.

Condition

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reasons

To protect and prevent the pollution of the water environment (particularly groundwater associated with the underlying Secondary and Principal Aquifers, from potential pollutants associated with current and previous land uses) in line with National Planning Policy Framework (NPPF - paragraphs 109 and 121), EU Water Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater protection: Principles and practice (GP3:2013) position statements.

NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

Piling

The Environmental Statement acknowledges that a piling risk assessment will be required to protect groundwater at the site. To control the location of any piling on the site we request the following condition is appended to any approval granted:

Condition

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

To protect and prevent the pollution of the water environment (particularly groundwater associated with the underlying Secondary and Principal Aquifers, from potential pollutants associated with current and previous land uses) in line with; NPPF (paragraphs 109 and 121), EU Water Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater protection: Principles and practice (GP3:2013) position statements.

NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Ground Source Heating

The District Heating Feasibility Study, prepared by Climate Energy Integrated Solutions and dated July 2015, has identified Ground Source Heating as an option for this site.

Our document, Groundwater, Principles and Practice (GP3 2013), sets out a number of position statements for development proposed in areas with sensitive groundwaters. As the applicant develops these plans further, they should have regard to Position Statements R1 – R6 of this document to ensure they are acceptable. Our document 'Environmental Good Practice for Ground Source Heating and Cooling' (GEHO0311BTPA-E-E) should also be referred to for further information on permitting requirements and whether they are likely to be suitable if located in the SPZ1.

Development in SPZ1 areas

The applicant should review position statement D2, D3, F1, G8, G12, G13 and N8 of GP3 which defines acceptable land uses for areas designated as SPZ1. This should inform the layout of the site at the reserved matters stage.

Land Contamination

The Phase 1 Geo environmental Desk Study, prepared by Amec Foster Wheeler and dated November 2015, has identified a number of previous uses which will require further investigation and risk assessment to determine whether remediation is required to ensure the protection of the water environment.

As such we recommend the following conditions are attached to any permission granted:

Condition

Prior to each phase of development approved by this planning permission no development shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A preliminary risk assessment which has identified:
 - all previous uses

- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Condition

No occupation of each phase of development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Condition

No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Condition

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

Reasons

To protect and prevent the pollution of the water environment (particularly groundwater associated with the underlying Secondary and Principal Aquifers, from potential pollutants associated with current and previous land uses) in line with NPPF (paragraphs 109 and 121), EU Water Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater protection: Principles and practice (GP3:2013) position statements.

NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Proximity to a permitted facility

The proposed development will be located within 1km of an existing dry pet food manufacturing installation, permitted under the Environmental Permitting (England and Wales) Regulations 2010 and regulated by the us.

This could result in the community at the proposed development being exposed to odour and noise impacts. The severity of these impacts will depend on the nature of the activities undertaken at the installation or prevailing weather conditions.

If the operator can demonstrate that they have taken all reasonable precautions to mitigate these impacts, the facility and community will co-exist, with some residual impacts. In some cases, these residual impacts may cause local residents concern, and there are limits to the mitigation the operator can apply. Only in very exceptional circumstances would we revoke the operators permit.

Environmental Permitting Regulations

The application incorporates a new household waste recycling site. As this type of activity will involve the storing and treating of waste, it will require a full Environmental Permit granted by us under the Environmental Permitting (England and Wales) Regulations 2010.

If the criteria and conditions of a standard rules permit can be complied with at all times, then a standard rules permit should be applicable, however if not, a bespoke permit will be required.

Operations will be expected to fully comply with the permit at all times (once granted), however amenity issues including odour, noise and dust may still be an issue to local receptors even when the operator is fully compliant with their permit.

Appropriately designed and engineered infrastructure and containment measures will need to be fully implemented prior to any activities taking place on site as required by the permit.

The applicant should contact our local Environment Management team on 0203 025 8367 if they want to discuss these requirements further.

Foul Water Disposal

Given the scale of the development, Anglian Water should be consulted regarding the available capacity in the foul water sewer and receiving Water Recycling Centre.

If there is not sufficient capacity then we must be consulted again with alternative methods of disposal.

Sustainability

Climate change is one of the biggest threats to the economy, environment and society. New development should therefore be designed with a view to improving resilience and adapting to the effects of climate change, particularly with regards to already stretched environmental resources and infrastructure such as water supply and treatment, water quality and waste disposal facilities. We also need to limit the contribution of new development to climate change and minimise the consumption of natural resources.

Opportunities should therefore be taken in the planning system, no matter the scale of the development, to contribute to tackling these problems. In particular we recommend the following issues are considered at the determination stage and incorporated into suitable planning conditions:

- **Overall sustainability:** a pre-assessment under the appropriate Code/BREEAM standard should be submitted with the application. We recommend that design Stage and Post-Construction certificates (issued by the Building Research Establishment or equivalent authorising body) are sought through planning conditions.
- **Resource efficiency:** a reduction in the use of resources (including water, energy, waste and materials) should be encouraged to a level which is sustainable in the long term. As well as helping the environment, Defra have advised that making simple changes resulting in the more efficient use of resources could save UK businesses around £23bn per year.
- **Net gains for nature:** opportunities should be taken to ensure the development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.
- **Sustainable energy use:** the development should be designed to minimise energy demand and have decentralised and renewable energy technologies (as appropriate) incorporated, while ensuring that adverse impacts are satisfactorily addressed.

These measures are in line with the objectives of the NPPF, as set out in paragraphs 7 and 93-108, and are supported by Policies CS7, CS8, CS10, CS12 and CS15 of your adopted Core Strategy/Local Plan Reference should also be made to the Climate Change section of the draft National Planning Practice Guidance, in particular: "Why is it important for planning to consider climate change?" and "Where can I find out more about climate change mitigation and adaptation?"

<http://planningguidance.planningportal.gov.uk/blog/guidance/>.

Additional guidance on considering climate change for this proposal is provided in an appendix at the end of this letter.

We trust this advice is useful.

Yours sincerely



Mrs Jo Firth
Sustainable Places Team

Direct dial 01473 706016

Direct e-mail jo.firth@environment-agency.gov.uk

cc AMEC

Technical Appendix – Sustainability

We suggest the following points are addressed by the applicant to limit the developments impact on the environment and ensure it is resilient to future climate change.

Water Efficiency

Over the next 20 years demand for water is set to increase substantially yet there is likely to be less water available due to a drier climate and tighter controls on abstraction. To address this new development should be designed to be as water efficient as possible. This will not only reduce water consumption but also reduce energy bills as approximately 24% of domestic energy consumption in the UK goes to heating water (DTI 2002).

Simple solutions such as dual-flush toilets, water-saving taps and showers, water butts and appliances with the highest water efficiency rating should all be included in the residential aspects of the proposal. The use of greywater recycling and rainwater harvesting will achieve a higher efficiency for the development and should be installed wherever possible.

The payback following investment in water saving devices is often higher in commercial units than residential due to the higher frequency of use. Simple measures such as urinal controls or waterless urinals, efficient flush toilets and automatic or sensor taps are therefore very effective. Likewise investment in water recycling schemes is also more viable in business settings. Further advice is available at: <http://www.anglianwater.co.uk/business/business-services/>

We also recommend that developers consider using equipment on the Water and Energy Technology List, a directory of products which have met an approved water and energy efficiency eligibility criteria.

Any submitted scheme should include detailed information (capacities, consumption rates, etc) on proposed water saving measures. Where rainwater recycling or greywater recycling is proposed, this should be indicated on site plans. Applicants are also advised to refer to the following for further guidance: <http://www.water-efficient-buildings.org.uk/> ; <http://www.water-efficient-buildings.org.uk/> ; and <http://www.savewatersavemoney.co.uk>

Waste and Resource Management

Waste should no longer be regarded as a problem to be disposed of, but a resource in its own right. The management of waste should be considered early in the design phase and all developments encouraged to follow the Construction Waste Hierarchy of prevention > re-use > recycling > recovery > disposal. Further information on this can be found at www.defra.gov.uk/publications/files/pb13530-waste-hierarchy-guidance.pdf.

Measures to be included to reduce construction waste include procedures to prevent the over-ordering of materials, reducing damage to materials before use by careful handling and segregating waste on site into separate skips. The developer should also consider how they will incorporate recycled/recovered materials into the building programme, including the use of secondary and recycled aggregates, and re-use of any on-site demolition waste.

Development design can also facilitate household waste recycling and we would suggest that designs incorporate facilities to aid this in line with local recycling provision, especially in multiple-occupancy buildings. We would also suggest that consideration is given to the provision for recycling opportunities within public areas. We recommend the following websites which provide ideas and further information: <http://www.wrap.org.uk> and <http://www.tcpa.org.uk/pages/towards-zero-waste.html>.

Net Gains for Nature

Landscaping proposals should demonstrate that thought has been given to maximising potential ecological enhancement. Paragraph 9 of the NPPF sets out that planning should seek positive improvements and includes an aim to move from a net loss of biodiversity to achieving net gains for nature in line with the Natural Environment White Paper (2011). In determining planning applications Local Authorities are asked to conserve and enhance biodiversity and encourage opportunities to incorporate biodiversity in and around developments (para.118). This presents an opportunity to provide multi-functional benefits - providing open space for residents, sustainable transport links, wildlife/ecological value, climate change resilience, improved water quality and flood risk management.

Incorporating green and/or brown roofs and walls are particularly effective. They provide valuable urban habitats, increased energy efficiency of buildings and attenuation of rain water. Research from the journal '*Environmental Science and Technology*' claims that green walls deliver cleaner air at street level where most people are exposed to the highest pollution. They can also add to an attractive street scene if designed well – a good example of this is the Transport for London Green Wall near Blackfriars station.

Additional Useful Resources

We have full responsibility for the governments Climate Ready support service which provides advice and support to businesses, the public sector and other organisations on adapting to and building resilience for climate change. The aim is to ensure businesses and services assess how they will be impacted by a changing climate so that they are both resilient and can thrive in the future. Further information and guidance can be found here <http://www.sustainabilityeast.org.uk/>

The UK Green Building Council has also published a series of documents to help Local Authorities and developers to understand sustainability issues. These documents are available on their website at: <http://www.ukgbc.org/content/advice-planners-and-developers>.

The most recently published technical guidance to the Communities and Local Government's 'Code for Sustainable Homes' also provides useful guidance: <https://www.gov.uk/government/policies/improving-the-energy-efficiency-of-buildings-and-using-planning-to-protect-the-environment/supporting-pages/code-for-sustainable-homes>.



Environment
Agency

Babergh District Council
Development Control
Council Offices Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Our ref: AE/2016/120074/02-L01
Your ref: B/15/01718/OUT
Date: 02 June 2017

Dear Sir/Madam

UP TO 1,100 DWELLINGS (USE CLASS C3); 16.4HA OF EMPLOYMENT DEVELOPMENT (TO INCLUDE B1, B2 AND B8 USES, A HOTEL (C1), A HOUSEHOLD WASTE RECYCLING CENTRE (SUI GENERIS) AND A DISTRICT HEATING NETWORK); VILLAGE CENTRE COMPRISING UP TO 1,000M2 GROSS FLOOR AREA (GFA) OF RETAIL FLOOR SPACE (A1, A2, A3, A4 AND A5), VILLAGE HALL (D2), WORKSPACE (B1A), RESIDENTIAL DWELLINGS (C3), PRIMARY SCHOOL (D1), PRE-SCHOOL (D1) AND CAR PARKING; NEW POINTS OF VEHICULAR ACCESS AND ASSOCIATED WORKS; SUSTAINABLE TRANSPORT LINKS; COMMUNITY WOODLAND; OPEN SPACE (INCLUDING CHILDREN'S PLAY AREAS); SUSTAINABLE DRAINAGE (SUDS); SPORTS PAVILION (D2) AND PLAYING FIELDS; ALLOTMENTS; AND ASSOCIATED ANCILLARY WORKS. CHILTON WOODS, LAND NORTH OF WOODHALL BUSINESS PARK, SUDBURY.

Thank you for your consultation dated 13 May 2017. We previously responded to this application in our letter reference AE/2016/120074/01 dated 16 February 2016. We have reviewed the new information as submitted and have no further comments to make to our previous response.

We trust this information is useful.

Environment Agency
Iceni House Cobham Road, Ipswich, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Yours faithfully



Mr. Pat Abbott
Planning Advisor

Direct dial 02084748011

Direct e-mail pat.abbott@environment-agency.gov.uk

End



Environment
Agency

Steven Stroud
Babergh District Council
Development Control
Council Offices Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Our ref: AE/2016/120074/03-L01
Your ref: B/15/01718/OUT
Date: 02 October 2017

Dear Mr Stroud

**PROPOSED DEVELOPMENT AT CHILTON WOODS MIXED USE
DEVELOPMENT.**

**CHILTON WOODS, LAND NORTH OF WOODHALL BUSINESS PARK,
SUDBURY.**

Thank you for your consultation dated 14 September 2017. We previously responded to this application in our letters referenced AE/2016/120074/01-L01 dated 16 February 2016 and AE/2016/120074/02-L01 dated 02 June 2017. We have reviewed the new information as submitted and the application documents do not currently hold any additional information which would alter our responses made to date.

We trust this information is useful.

Yours sincerely

**Miss Charlie Christensen
Planning Adviser**

Direct dial 02084 745593

Direct e-mail charlie.christensen@environment-agency.gov.uk

cc AMEC

From: RM Floods Planning
Sent: 08 April 2016 08:24
To: Planning Emails
Cc: Ben Elvin; Matt Hullis; Leigh Parratt (Leigh@amazi.co.uk)
Subject: SCC Reply Planning Consultation Request Ref: B/15/01718 - Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

Suffolk County Council, Flood & Water management would like to make the following additional comments at this stage.

The following provides a summary of comments from an independence expert review of the drainage and flood risk planning documents associated with this forthcoming application

Flood risk Assessment (FRA) L35223R021, November 2015

General comments:

NB: FRA and Drainage Strategy best if included in one report because they are intrinsically linked.

1. Fig 2.2 - Site and hydrological catchments a little difficult to distinguish. Maybe use more colours or line types to clearly show both?
2. Fig 2.2 – consider including lidar or surveyed contours on this plan too. There is no overall hydrological contour plan in this FRA which is important for the reader to see hydrological catchment boundaries and contours. *(There is a plan showing this included in the Drainage strategy, drawing 35223-LEA-CVD-057B.)*
3. Again, better plans of existing ditches are included in the Drainage Strategy, but not the FRA. These are vital to the assessment of flood risk, so if the FRA is to be split into two documents, these should be in both reports.
4. P10 refers to 'series of ditches'. Again, these ditches are important to identify in a FRA, partially because it is the key planning document that identifies existing watercourses and can later be used for reference when considering the various applications that will be required regarding the Land Drainage Act.

Fundamental comments:

5. Page 23, section 5, introduces specific mitigation measures (*150 mm to FFL and properties > 10m from areas identified at risk*). No surface water flood depths given though? However, the majority of the site is the surface water catchment which these risks arise from, so the FRA should be referring to the possible proposed surface water risks as well as identifying the existing. The FRA therefore needs to include proposed site exceedance runoff measures and some review of likely proposed surface water flood extents etc.
6. When reading the FRA there is no mention of a proposed site layout. There is a site layout in the Drainage report though. The FRA should refer to the proposed site not just the existing, else how can it be a FRA for the proposed development?
7. The existing hydrological sub-catchments should extend to the north of the site, not be confined by the site boundary. The catchment area to the north is shown all in one 'offsite catchment' although it also has sub-catchments. These should be defined and it should be clear where/how the runoff from these will be managed in future. For example, the Drainage report appears to show proposed attenuation ponds over the existing watercourses. What is the flow from uphill of the site (*from the 'offsite' areas*) that needs to be maintained flowing through each site 'Area', to downstream of the site?
8. Page 22 – refers to climate change of 30%. This needs to be changed to suit the more recently published Government climate change allowances.

Drainage Strategy L35223R033, November 2015

General comments:

9. Again, would be useful for the report to more clearly note how the 'offsite' (*upper catchment*) flows will be maintained through the proposed site. Drawing ...58 - Attenuation ponds seem to be shown over existing watercourses. Just needs clarifying if these watercourses are required to convey flows from the 'offsite' areas.
10. Outfall from area 1 to pond or sewer: The proposed outfall should be clarified for the planning application. Where does this existing system go, is the downstream system likely to be able to facilitate the site runoff? The site cannot be responsible for the downstream systems, but it would be good practice to check there isn't, say, a discontinuous system etc..

11. Section 3.2 – Is this referring to the latest SCC SuDS Guidance document, please advise
12. Section 3.3 – refers to CIRIA report C697. This has since been superseded by C753.
13. Table 3.3, note 1, should refer to drawing ...59, rather than ...58.
14. Table 3.4 - Maybe useful for this table to also identify the areas (1-4), so proposed flow can be compare to existing flows in Table 2.3. Would be useful to clearly compare proposed runoff rates with existing (areas not equal?). Hence have I not been able to check this. If existing and proposed catchments are not the same, there should be some commentary accordingly. Allowable flow rates in Table 2.3 do not match rates on Appendix C.
15. Table 3.4 - refers to 1:2 year flows, but existing 1:2 year flows not given in table 2.3., so cannot be compared. $Q_{bar} \square$ 1:2 year.
16. Appendix C – Microdrainage output should also include catchment areas in the model input.
17. Although the report sets out the type of attenuation storage systems, the accompanying calculations are quite simplistic in that they do not include different storage systems, e.g. Sub-catchment C, permeable paving and pond, flow rates from each system etc. SCC need to be sure that level of detail in the report is as expected for this outline application. It would not be suitable for a detailed application. Would suggest at the most important thing this report can establish is the proposed site runoff rates (see item 23 below).

Fundamental comments:

18. Section 2.3 – The methodology used in establishing Greenfield runoff rates is technically incorrect. Although the total site area is > 50 ha, none of the individual hydrological sub-catchments are > 50 ha (or they do not appear to be from the information provided – refer to item 8 above which says how the catchment areas ‘offsite’ are not given). The correct methodology is the Environment Agency R&D Technical Report W5-074/A/TR/1 Revision E, the adjusted IOH124 method. The selection of runoff methodology should be based upon hydrological catchments, not site boundary areas. This may not mean the resulting flow rates are necessarily incorrect, but the report should refer to the correct methodology.
19. Location of outfall 4 not identified? This is acknowledge on page 17, which says will be progressed at detailed design stage. Outfall locations are important to clearly identify, even in an outline planning application.
20. Section 3.7 states that the ‘maximum flows leaving the sub-catchments has been restricted to the 1:100 + 30 % rating of 10.8 l/s/ha’. This appears to be a typo and should be the current day 1:100 year rate, not the climate change enhanced rate. Climate change is only to be applied to

the proposed situation. Table 2.3 implies that 10.8 l/s/ha is the current day 1:100, not 1:100 + CC rate.

21. The report does not clarify how exceedance flows will be managed and prevent uncontrolled runoff to area already at risk of surface water flooding to the south.
22. The proposed drainage strategy does not comply with the Non Statutory Technical Standards for Sustainable Drainage (NSTSSD), March 2015. The proposed strategy appears to provide a match, or slight betterment, of existing 1:2, 1:30 and 1:100 year rates. This does not comply with S2 and S6 of the NSTSSD.
23. In order to comply with NSTSSD S2, the 1:1 year event must also be analysed.
24. In order to comply with NSTSSD S6, where soils do not facilitate infiltration, usual best practice is to either:
25. Reduce proposed 1:100 + CC runoff to existing Qbar rate or restrict proposed 1:1 and 1:100 + CC to existing 1:1 and 1:100 respectively AND provide Long Term Storage. If not Long Term Storage, the report must demonstrate some other way that the discharge rates do 'not adversely affect flood risk'.
26. Related to this: Appendix C calculations, do not analyse 1:1 year event.

Prepared by Leigh-Suzanne Parratt, BEng (Hons) CEng MICE MCIWEM CWEM PGCHEP FHEA - 24
March 2016

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864

From: Jason Skilton
Sent: 30 Jun 2017 14:56:06 +0100
To: BMSDC Planning Area Team Green
Cc: Steven Stroud
Subject: 2017-06-30 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury Ref B/15/01718

Dear Steven Shroud,

Subject: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury Ref B/15/01718

Suffolk County Council, Flood and Water Management have reviewed application ref B/15/01718.

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

1. Flood Risk Assessment L35223R021, November 2015
2. Drainage Strategy (including appendices) Ref L35223R033
3. Technical Note – Surface Water Drainage Strategy dated 29th June 2017
4. Site Location Plan Ref 35223-Lea204
5. Illustrative Masterplan Ref 35223-Lea98f

We propose the following condition in relation to surface water drainage for this application.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and technical note and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - c. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;

- d. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- e. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- f. Surface water drainage modelling of the existing highway drainage that discharges into the highway lagoon, plus any other water that enters the highway lagoon and modelling of the outfall from the highway lagoon to a watercourse, both of which shall demonstrate that there will be no adverse impact on the highway lagoon and the outfall to the watercourse from the additional flows from the development hereby permitted.

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

2. Concurrent with the first reserved matters application details of the drainage connection to the highway lagoon, including its future management and maintenance, shall be submitted to and approved in writing by the local planning authority. The drainage connection shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development, to ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water into the highway lagoon and to ensure an agreement is in place to permit the discharge into the highway lagoon.

3. Concurrent with the first reserved matters application details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

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

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

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

5. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864

Date: 10 March 2016
Our ref: 177041
Your ref: B/15/01718/OUT



Ben Elvin
Senior Development Management Officer
Babergh District Council

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

planning.control@babergh.gov.uk

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Elvin

Planning consultation: Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Location: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

Thank you for your consultation on the above dated 22 January 2016 which was received by Natural England the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

1) Advice under the Conservation of Habitats & Species Regulations 2010 (as amended) and the Wildlife and Countryside Act 1981 (as amended)

Internationally and nationally designated sites

Natural England does not consider that this proposed development poses a likely risk to internationally (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites¹) or nationally (Sites of Special Scientific Interest (SSSI)) designated sites.

¹ Listed or proposed Wetlands of International Importance under the Ramsar Convention (Ramsar) sites are protected as a matter of Government policy. Paragraph 118 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.



2) Advice on Soils and Land Quality

Although we consider that this proposal falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, Natural England draws your Authority's attention to the following land quality and soil considerations:

- i) Based on the information provided with the planning application, it appears that the proposed development comprises approximately 117 ha of agricultural land. We note that a detailed Agricultural Land Classification (ALC) survey has not been submitted in support of the application; the Environmental Statement (ES) assumes the entire area to be 'best and most versatile' land (Grades 1, 2 and 3a land in the ALC system).
- ii) Natural England holds some detailed ALC surveys which cover 79.5 ha of the proposed development site. For your information, these surveys classify 39.6 ha as grade 2, 31.3 ha as grade 3a and 8.6 ha as 'other' land. The maps and report from which these details have been taken can be made available on request.
- iii) While the ES acknowledges that there are to be some 'soft uses' within the development boundary (e.g. the public open space), it considers that all this land will be irreversibly lost as a result of the proposed development.
- iv) Government policy is set out in paragraph 112 of the National Planning Policy Framework which states that:

'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. 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.'
- v) In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.
- vi) Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled and how to make best use of the different soils on site. Further guidance is available in Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(including accompanying Toolbox Talks\)](#) and we recommend that this is followed.

2) Other advice

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully

understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at [Wildlife and Countryside link](#).

Protected Species

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published [Standing Advice](#) on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

Biodiversity enhancements

This application provides 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 NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that '*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'. Section 40(3) of the same Act also states that '*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*'.

Impact Risk Zones for Sites of Special Scientific Interest

Natural England has published a set of mapped Impact Risk Zones (IRZs) for SSSIs. This helpful GIS tool can be used by LPAs to help consider whether a proposed development is likely to affect a SSSI and determine whether they need to consult Natural England to seek advice on the nature of any potential SSSI impacts, their avoidance or mitigation. The dataset and user guidance can be accessed from the [gov.uk website](#).

This concludes Natural England's advice which I hope you will find helpful.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Jack Haynes using the details given below. For any new consultations, or to provide further information on this consultation, please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Jack Haynes

Land Use Operations Norfolk & Suffolk Team

Email: jack.haynes@naturalengland.org.uk

Tel: 0300 060 1498



From: Consultations (NE)
Sent: 18 May 2017 10:00
To: X Delete Aug 17 - Planning Emails
Subject: B/15/01718/OUT CONSULTATION RESPONSE

Dear Sir or Madam,

Our ref: 215752
Your ref: B/15/01718/OUT

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 10 March 2016

The advice provided in our previous response applies equally to this **amendment** although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully
Alice Watson
Consultations Team
Natural England
Electra Way
Crewe Business Park
Crewe
Cheshire
CW1 6GJ
Tel: 0300 060 3900

consultations@naturalengland.org.uk

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental

considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

18/03/16

Objects

BEL



Ben Elvin
Planning Department
Babergh District Council
Corks Lane
Hadleigh
IP7 6SJ

BABERGH DISTRICT
COUNCIL
18 MAR 2016
PLANNING
DEPARTMENT

18/03/2016

Dear Ben,

RE: B/15/01718/OUT Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings; 16.4ha of employment development; a household waste recycling centre; village centre; community woodland; open space and associated ancillary works. Chilton Woods Mixed Use Development, Land North of Woodhall Business Park, Sudbury

Thank you for sending us details of this application. For the reasons stated below we wish to **object** to this proposal.

We have read the ecological chapter of the Environmental Statement (ES) (Amec Foster Wheeler, Dec 2015) and the supporting ecological survey reports (Extended Phase 1; Bats; Great Crested Newts; Hazel Dormice; Reptiles; Breeding Birds; Wintering Birds and Hedgerows) and we note the findings of the consultant.

Designated Sites

Waldingfield Airfield Arable Margins County Wildlife Site (CWS)

As acknowledged in the ES, the application site includes part of Waldingfield Airfield Arable Margins CWS. This site is designated for its rare flora, including spreading hedge parsley (*Torilis arvensis*) which is a Nationally Scarce species. Figure 12.1 (Biodiversity Measures Plan) within the ES shows scrub planting to screen the CWS from the proposed development. Whilst it is noted that paragraph 12.8.7 of the ES states that any such planting will be outside of the CWS (to avoid any impacts on the flora for which the site is designated), this is not clear in Figure 12.1 which appears to show planting on part of the CWS. We therefore recommend that, should permission be granted, any approved landscaping scheme clearly shows that there will be no scrub planting on the CWS. Habitats within the CWS which support the species for which it is designated should be protected, and where possible extended.

Protected and UK and Suffolk Priority Species

Hazel Dormice

We note that hazel dormice (a European Protected Species) were recorded within the site, and that it is considered that they are likely to be present in suitable habitat across the site. The ES goes on to describe measures which will be implemented, via an EPS Licence, to minimise the risk of adverse effects on the favourable conservation status of dormice.

We have several concerns with the current level of understanding of the use of the site by dormice. We have been studying dormice in Suffolk since 1998. The majority of the extant populations are believed to exist in the South of the County, with two exceptions. In the east of England, it is more unusual for populations to be situated in a landscape that is primarily ancient hedgerows, as the majority of other known sites are a mixture of hedges and woodlands of varying size and age, but with at least some ancient features. We have checked the 1886 First

Suffolk Wildlife Trust,
Brooke House, Ashbocking,
Ipswich, IP6 9JY
Tel: 01473 890089

www.suffolkwildlifetrust.org

info@suffolkwildlifetrust.org

Suffolk Wildlife Trust is a
registered charity
no. 262777

Edition Ordnance Survey map and the current landscape appears to be relatively unchanged.

At the Chilton site it is difficult to assess which features support the core population. As acknowledged in the ES, dormice are known to live at low densities, so the population is likely to be diffusely distributed across the site otherwise the population would not be sustainable in this location. In 4.1 of the Dormice survey report, it is indicated that dormice may occur in other parts of the site other than hedgerow DM9 (and presumably the area of broadleaf planting where dormouse open hazel nuts were recorded). Unfortunately, there does not appear to be a plan within the application showing the location of DM9 and Figure 2.1 uses 'H' letter codes for hedgerows. We therefore have had to estimate that DM9 is H3 as shown on Figure 2.1, with the area where nuts were found marked as WS3.

As the wider distribution of this population is unknown, the removal of hedgerow DM9 may lead to a fragmentary effect acting upon the population, which could ultimately compromise it in this type of landscape. In particular, it is unknown whether dormice occupy habitats along the southern boundary and also any offsite areas which may contain suitable habitat. The aerial view north of Woodhall Moat seems to show this is heavily scrubbed up, so this, along with other connecting habitat, may represent a contributing area to the wider dormouse population. We also note that some of the hedgerows within the site are unsurveyed. Even if they are proposed for retention, we still believe there is a risk to the population if these hedgerows become surrounded by the built environment, so the presence of dormice within them should be assessed. From aerial imagery these areas include: an east-west stretch between H5 and H3; the hedges along Acton Lane and the hedges bordering what appears to be an orchard west of Chilton Hall Farm. Also, the map of tube locations (Dormouse survey report Figure 2.1) shows that the northern boundary of WS4 was surveyed, however we query why the southern boundary was not surveyed?

Based on the above, we consider that further dormouse surveys are required to inform adequate assessment the impact of the proposed development on this species. At present we believe that there is insufficient information available to conclude that the proposed mitigation measures will be sufficient to ensure that the development does not result in a significant adverse impact on this species. We recommend using a minimum of 50 tubes in any one habitat block and leaving the tubes in situ from early Spring until the late Autumn (October) as a minimum, although we do have experience of sites that do not yield any dormice evidence until November, so there may be a requirement to extend the survey in to this month.

Great Crested Newts (GCN)

We note that GCN have been recorded in ponds to both the north and south of the site and that the ES considers that they are likely to be present in suitable terrestrial habitat on the site. The GCN survey report concludes that mitigation, delivered under an EPS licence, is required. ES section 12.5 states that mitigation will include a GCN trapping and translocation exercise. However, no detail on the location of the necessary receptor site appears to be available, nor is it clear whether such a site would be within the development boundary or not. In the absence of such information it is unclear whether the proposed development would result in an adverse impact on GCN populations in this part of the county.

Reptiles

Surveys at the site recorded a 'Good' population of common lizard and a 'Low' Population of grass snake. We note that ES section 12.5 states that any reptiles in habitat which will be lost to the development will be translocated to an on-site receptor site. It should be ensured that such a receptor site is prepared and available, and that translocation is undertaken in full, in advance of any works affecting habitat suitable for reptiles. We recommend that the methodologies for the creation and management of the receptor site and the translocation exercise are set out in a Reptile Mitigation Strategy, the production and implementation of which should be secured by a suitably worded condition, should permission be granted.

Breeding and Wintering Birds

The application and its surrounds (including the adjacent CWS) has been recorded as supporting a range of breeding and wintering birds, including a number of UK and Suffolk Priority Species. Of particular note is the identification of breeding corn bunting. The ES identifies mitigation measures for breeding and wintering birds, including provisions for corn bunting and skylark on the adjacent arable land (including part of the CWS). We recommend that all identified measures are set out in full in an Ecological Mitigation and Management Plan, the production and implementation of which should be secured via a suitably worded condition, should permission be granted.

In addition to this, the development should incorporate enhancement measures for birds. This could include the provision of integrated nesting boxes for species such as swifts.

Other Species

We note the findings of the ES in relation to bats, badgers and other mammals. We recommend that all identified mitigation measures are set out in full in an Ecological Mitigation and Management Plan, the production and implementation of which should be secured via a suitably worded condition, should permission be granted.

In addition to this, the development should incorporate enhancement measures for these species, including hedgehog friendly garden boundaries and integrated roosting opportunities for bats.

Additional Comments

Further surveys

It is noted that this application is for Outline planning consent. It may therefore be necessary to update the existing survey and assessment work as part of any Reserved Matters applications (should Outline consent be granted), dependent on the amount of time which elapses between applications.

Conclusion

As currently presented, we consider that the application fails to demonstrate that the proposed development would not result in a significant adverse impact on Protected and/or UK and Suffolk Priority species (in particular dormice and great crested newts). The proposal is therefore not in accordance with the requirements of the National Planning Policy Framework (NPPF) and Babergh District Council's adopted planning policy (Core Strategy Policy CS15 – Implementing Sustainable Development in Babergh). For the reasons set out above we object to this application.

If you require any further information or wish to discuss any of the matters raised above, please do not hesitate to contact us.

Yours sincerely

James Meyer
Conservation Planner



Ben Elvin
Planning Department
Babergh District Council
Corks Lane
Hadleigh
IP7 6SJ

Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

23/06/2017

Dear Ben,

RE: B/15/01718/OUT Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings; 16.4ha of employment development; a household waste recycling centre; village centre; community woodland; open space and associated ancillary works. Chilton Woods Mixed Use Development, Land North of Woodhall Business Park, Sudbury

Thank you for sending us further details of this application, we previously responded to this consultation in our letter of 18th March 2016. We have read the Revised Biodiversity Assessment (Amec Foster Wheeler, May 2017) and the Dormouse Survey and Mitigation Technical Note 2 (Amec Foster Wheeler, Jan 2017) and we note the updated conclusions and recommendations of the consultant. We have the following comments on this proposal:

Designated Sites

Waldingfield Airfield Arable Margins County Wildlife Site (CWS)

As acknowledged in the ES, the application site includes part of Waldingfield Airfield Arable Margins CWS. This site is designated for its rare flora, including spreading hedge parsley (*Torilis arvensis*) which is a Nationally Scarce species. Figure 12.1 (Biodiversity Measures Plan) within the ES shows scrub planting to screen the CWS from the proposed development. Whilst it is noted that paragraph 12.8.7 of the ES states that any such planting will be outside of the CWS (to avoid any impacts on the flora for which the site is designated), this is not clear in Figure 12.1 which appears to show planting on part of the CWS. We therefore recommend that, should permission be granted, any approved landscaping scheme clearly shows that there will be no scrub planting on the CWS. Habitats within the CWS which support the species for which it is designated should be protected, and where possible extended.

Protected and UK and Suffolk Priority Species

Hazel Dormice

Hazel dormice (a European Protected Species) have been recorded within the site, and it is considered that they are likely to be present in suitable habitat across the site. The Dormouse Survey and Mitigation Technical Note 2 describes updated mitigation measures based on discussions between the applicant's ecological consultant, Babergh DC's consultant ecologist and Suffolk Wildlife Trust. The revised mitigation measures satisfy the concerns we raised in our letter of 18th March 2016 and we request that they are secured and implemented as part of the development, should permission be granted.

Great Crested Newts (GCN)

We note that GCN have been recorded in ponds to both the north and south of the site and that the ES considers that they are likely to be present in suitable terrestrial habitat on the site. The GCN survey report

A company limited by
guarantee no 695346
Registered charity no 262777

concludes that mitigation, delivered under an EPS licence, is required. ES section 12.5 states that mitigation will include a GCN trapping and translocation exercise, it is understood that this will be to an area within the application site. We recommend that the methodologies for the creation and management of the receptor site and the translocation exercise are set out in a Great Crested Newt Mitigation Strategy, the production and implementation of which should be secured by a suitably worded condition, should permission be granted.

Reptiles

Surveys at the site recorded a 'Good' population of common lizard and a 'Low' Population of grass snake. We note that ES section 12.5 states that any reptiles in habitat which will be lost to the development will be translocated to an on-site receptor site. It should be ensured that such a receptor site is prepared and available, and that translocation is undertaken in full, in advance of any works affecting habitat suitable for reptiles. We recommend that the methodologies for the creation and management of the receptor site and the translocation exercise are set out in a Reptile Mitigation Strategy, the production and implementation of which should be secured by a suitably worded condition, should permission be granted.

Breeding and Wintering Birds

The application site and its surrounds (including the adjacent CWS) have been recorded as supporting a range of breeding and wintering birds, including a number of UK and Suffolk Priority Species. Of particular note is the identification of breeding corn bunting. The ES identifies mitigation measures for breeding and wintering birds, including provisions for corn bunting and skylark on the adjacent arable land (including part of the CWS). We recommend that all identified measures are set out in full in an Ecological Mitigation and Management Plan, the production and implementation of which should be secured via a suitably worded condition, should permission be granted.

In addition to this, the development should incorporate enhancement measures for birds. This could include the provision of integrated nesting boxes for species such as swifts.

Other Species

We note the findings of the ES in relation to bats; badgers and other mammals. We recommend that all identified mitigation measures are set out in full in an Ecological Mitigation and Management Plan, the production and implementation of which should be secured via a suitably worded condition, should permission be granted.

In addition to this, the development should incorporate enhancement measures for these species, including hedgehog friendly garden boundaries and integrated roosting opportunities for bats.

Green Space Provision

The proposed development offers the opportunity to secure enhanced green space provision for the town. It is important that these green spaces are meaningfully linked to the existing provision on this side of the town to ensure that they are accessible to existing and new residents. It is also important that these areas are suitably managed to maximise their biodiversity value. We recommend that a long-term habitat management plan is produced and implemented as part of the development to ensure that the opportunities that these areas present for people and wildlife are maximised.

Additional Comments

Further surveys

It is noted that this application is for Outline planning consent. It may therefore be necessary to update the existing survey and assessment work as part of any Reserved Matters applications (should Outline consent be granted), dependent on the amount of time which elapses between applications.

Conclusion

Based on the additional information provided and the amendments made to the proposed ecological mitigation measures, we withdraw our objection to this application. We request that the identified mitigation and enhancement measures (including those set out above) are secured and implemented as part of the development, should consent be granted.

If you require any further information or wish to discuss any of the matters raised above, please do not

hesitate to contact us.

Yours sincerely

James Meyer
Senior Conservation Planner



Defence
Infrastructure
Organisation

Safeguarding Statutory
Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Tel: +44 (0)121 311 3818 Tel (MOD): 94421 3818
Fax: +44 (0)121 311 2218

Email: DIO-safeguarding-statutory@mod.uk

www.mod.uk/DIO

18 May 2017

Babergh District Council
Planning Department
Corks Lane
Hadleigh
Suffolk
IP7 6SJ

Dear Sir/Madam,

Your Reference: B/15/01718/OUT

Our Reference: 10039957

MOD Safeguarding

Proposal: Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports

Location: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 13/05/2017. I can confirm that the MOD has no safeguarding objections to this proposal.

As this is an outline application the MOD would need to review any full application that is submitted for planning.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

Di Sylvester
Assistant Safeguarding Officer



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00011392

Local Planning Authority: Babergh District

Site: Land North of, Woodhall Business Park, SUDBURY
- Sudbury North

Proposal: Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Planning Application: B/15/01718/OUT.

Prepared by Mark Rhodes

Date 16 February 2016

If you would like to discuss any of the points in this document please contact me on 01733 414690 or email planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

- 1.1 There are assets 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. Anglian Water would ask that the following text be included within your Notice should permission be granted.

"Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 2.1 The foul drainage from this development is in the catchment of Sudbury Water Recycling Centre that will have available capacity for these flows.

Section 3 – Foul Sewerage Network

- 3.1 Development will lead to an unacceptable risk of flooding downstream. However a development impact assessment has been prepared in consultation with Anglian Water to determine a feasible mitigation solution.

We will request a condition requiring compliance with the agreed drainage strategy.

Section 4 – Surface Water Disposal

- 4.1 The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option.

Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

- 4.2 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).
-

We request a condition requiring a drainage strategy covering the issue(s) to be agreed.

Section 5 – Trade Effluent

- 5.1 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted.

"An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.

Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence.

Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991."

Section 6 – Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

Foul Sewerage Network (Section 3)

CONDITION *No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.*

REASON

To prevent environmental and amenity problems arising from flooding.

Surface Water Disposal (Section 4)

CONDITION

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy

so approved unless otherwise agreed in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

From: Philip Raiswell
Sent: Mon, 15 Feb 2016 16:22:02 +0000
To: Planning Emails
Subject: App Ref: B/15/01718/OUT - Chilton Woods

Sport England Ref: E/BB/2016/41803/N

FAO Mr B Elvin

Dear Sir,

Thank you for consulting Sport England on the above application. Sport England provides the following comments for your consideration.

Consultation Status

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.

However, the DCLG Planning Practice Guidance for Open Space, Sports and Recreation Facilities (March 2014) states that Sport England should be consulted on a wide range of applications on a non-statutory basis including residential developments of 300 dwellings or more; the creation of major new sports facilities (including new playing fields) or the loss of major sports facilities.

It is understood that Babergh DC is a Community Infrastructure Levy (CIL) charging authority and as such, the proposed development will be required to provide CIL contribution in accordance with the Councils adopted CIL Charging Schedule.

It is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport. This is particularly relevant with regard to community indoor sports facilities such as swimming pools and sports halls, as no provision for these will be made on site. The demand for these facilities will have to be met by existing facilities in the catchment area. Sport England has developed the Sports Facilities Calculator (SFC) to estimate the demand created by large scale residential development, and the pro-rata cost of meeting this demand.

For a development of 1,100 dwellings in Babergh District, generating a population of 2,640 (based on 2.4 persons per dwelling), the SFC calculates the following demand for sports facilities:

FACILITY	DEMAND	COST (PRO-RATA)
Sports Halls	0.77 courts or 0.19 sports hall (4 court)	£500,476
Swimming Pools	0.5 lane or 0.13 swimming pool (4 lane)	£388,155
Artificial Grass Pitches	0.07 pitch	£58,849 (3G pitch) £51,531 (sand-dressed pitch)

The above figures indicate that there is insufficient demand to warrant on-site provision, but that there is significant demand that will be displaced to other facilities in the catchment area. There is therefore a case to secure CIL contributions towards quantitative or qualitative improvements to existing facilities to help them meet this increased demand.

With regard to outdoor sport, the proposals indicate a designated allocation of 4.8 hectares for outdoor sport, served by a pavilion. This allocation appears to be in line with (and slightly exceed) the policy requirement for on-site provision for outdoor sport, and is therefore acceptable in principle to Sport England. However, the following issues will need to be addressed with regard to subsequent detailed submission:

- Pitch construction, layout and maintenance plans will need to meet standards contained within Sport England's technical guidance note 'Natural Turf for Sport' (2011). Pitches should be provided primarily on a north-south axis to avoid issues with the setting sun.
- A site survey will be required of the land to be used for sports pitches, to ensure site characteristics are taken into account before construction plans are developed.

- The pavilion will need to be provided to meet Sport England standards contained within our technical guidance document 'Pavilions and Clubhouses' (1999)
- Adequate car parking must be provided to serve the playing fields, in order to prevent on-street parking at peak times.

We would be happy to discuss these detailed issues with regard to playing field provision with the applicant/local authority in due course if this would be helpful.

I have consulted with sport NGB's on the proposals and have received the following comments:

RFU (Rugby Union) – *"The closest club to this development is Sudbury RFC. The provisional assessment and the modelling that the RFU hold demonstrates there to be a small shortfall of pitches of approximately 0.5 of a full size pitch and further still if you consider the midweek demand alone. The club in recent times have also registered the need to improve the drainage to the 2nd Pitch in particular to help it sustain the activity programme the club attempts to support. Although I do not feel rugby union facilities are required on the residential development in question, I feel that a contribution 'off-site' should be pursued to help build capacity at SRFC and address the existing shortfalls of the club in the shape of floodlighting and pitch quality".*

LTA (Tennis) – Sudbury is not a priority area for the LTA, but the existing Sudbury Lawn Tennis Club has three floodlit courts, therefore there may be an opportunity to expand this existing club.

England Hockey – there are no hockey facilities proposed as part of the development, but the existing club in the area play at Thomas Gainsborough Academy in Great Cornard. They are looking to develop a clubhouse on site, therefore there is an opportunity to secure off-site contribution as the new residents will generate demand for hockey facilities.

FA – no response received.

ECB (Cricket) – no response received.

The works shall be carried out in accordance with the approved scheme within a timescale to be first approved in writing by the Local Planning Authority after consultation with Sport England.

Reason: To ensure that site surveys are undertaken for new or replacement playing fields and that any ground condition constraints can be and are mitigated to ensure provision of an adequate quality playing field and to accord with LP Policy **

2. **The playing field/artificial grass pitch shall be used for Outdoor Sport and for no other purpose (including without limitation any other purpose in Class D2 Use Classes Order 2005, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).**

Reason: To protect the playing fields from loss and/or damage, to maintain the quality of and secure the safe use of sports pitch/es and to accord with LP Policy **.

Thank you once again for consulting Sport England. We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

Yours sincerely,

Philip Raiswell
Planning Manager

T: 020 7273 1824

M: 07769 741165

F: 020 7273 1981

E: Philip.Raiswell@sportengland.org

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and

From: Philip Raiswell
Sent: 23 May 2017 16:12
To: X Delete Aug 17 - Planning Emails
Subject: Planning Re-Consultation Request from Babergh District Council. Ref: B/15/01718 - Chilton Woods

Sport England Ref: E/BB/2016/41803/N

FAO Ben Elvin,

Thank you for consulting Sport England on the revisions to the above planning application.

As the proposals remain unchanged with regard to the provision for sport, Sport England's position remains the same as set out in our original representations dated 15 February 2016.

Kind Regards,

Philip Raiswell
Planning Manager

T: 020 7273 1824
M: 07769 741165
F: 020 7273 1981
E: Philip.Raiswell@sportengland.org



The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

From: Philip Raiswell
Sent: 18 Sep 2017 11:19:45 +0100
To: BMSDC Planning Mailbox
Subject: B/15/01718/OUT - Chilton Woods Mixed Use Development

Sport England Ref: E/BB/2016/41803/N

FAO Ben Elvin,

Thank you for consulting Sport England on the revisions to the above planning application (your email of 14 September refers).

As the proposals remain unchanged with regard to the provision for sport, Sport England's position remains the same as set out in our original representations dated 15 February 2016.

Kind Regards,

Philip Raiswell
Planning Manager

T: 020 7273 1824
M: 07769 741165
F: 020 7273 1981
E: Philip.Raiswell@sportengland.org



The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited.

From:RM PROW Planning
Sent:Tue, 16 Feb 2016 16:45:26 +0000
To:Planning Emails
Cc:david.fovargue@amecfw.com;Andrew Woodin;Steve Kerr;Glyn French;Andrew Pearce
Subject:RE: Planning Consultation Request from Babergh District Council. Ref: B/15/01718
Attachments:B1501718OUT - Chilton Woods Mixed Use Development, Land north of Woodhall Business Park - PROW map.pdf

Our Ref: W508/009/ROW737/15

For The Attention of: Ben Elvin

Public Rights of Way Response

Thank you for your consultation concerning the above application.

The following Public Rights of Way will be affected by this development.

Sudbury Public Footpath 9, Chilton Public Footpaths 10, 1 and 12 are through the proposed development area; Long Melford Bridleway 32 is adjacent.

Government guidance considers that the effect of development on a public right of way is a material consideration (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

There will be further comments submitted along with our s106 funding requirements in due course.

Informative Notes: "Public Rights of Way Planning Application Response - Applicant Responsibility" and a digital plot showing the definitive alignment of the route as near as can be ascertained; which is for information only and is not to be scaled from, is attached.

Regards

Jackie Gillis

Rights of Way Support Officer

Countryside Access Development Team

Rights of Way and Access

Resource Management, Suffolk County Council

Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

☎ (01473) 260811 | ✉ jackie.gillis@suffolk.gov.uk | 🌐 <http://publicrightsofway.onesuffolk.net/> |
Report A Public Right of Way Problem Here

For great ideas on visiting Suffolk's countryside visit www.discoversuffolk.org.uk |
<https://twitter.com/DiscoverSuffolk>

The 2016 Suffolk Walking Festival is between the 14th May and 5th June. For more information please visit www.suffolkwalkingfestival.co.uk

From: planning.control@babergh.gov.uk [<mailto:planning.control@babergh.gov.uk>]
Sent: 22 January 2016 12:20
To: RM PROW Planning
Subject: Planning Consultation Request from Babergh District Council. Ref: B/15/01718

Application No: B/15/01718/OUT
Location: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury
Proposal: Outline application (with all matters reserved except for access)
- Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and

associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

The application for planning permission described above has been received by Babergh District Council.

As you may be aware, Local Planning Authorities have a duty to determine applications within 8 weeks of receipt, 13 weeks for a Major application (or 16 weeks if accompanied by an EIA). It is important, therefore, that the views of consultees are received promptly so that any amendments may be negotiated, revised details received and the application determined within the prescribed period.

Details of the application are available for inspection online via the following link:

[Web Link to the Planning Application](#)

You may need to allow up to 5 working days for the application documents to appear.

I shall be grateful if you would advise me of any observations or representations which you wish to make in respect of the proposal no later than 56 days from the date of this letter.

If I do not receive a reply within this period I shall assume you have no observations or representations to make. However, if you feel that you will not be able to respond by the date given, please contact the above named officer, who may agree to an extension of time, dependent upon the facts of the case.

Please submit your comments by return e-mail.

Many Thanks

Bén Elvin, Senior Development Management Officer

Additional Information:

Grid/Map Ref:	TL8843SW Easting: 588317.052882038 Northing: 243161.352238079
Previous History:	BIE/15/01390
Road Classification:	ARD

Subject:FW: F.A.O. Ben Elvin - Environmental Statement - "Chilton Woods mixed use development" - B/15/01718/OUT

From: Tab Omar [<mailto:Tab.Omar@communities.gsi.gov.uk>]

Sent: 25 January 2016 15:39

To: Planning Emails

Subject: F.A.O. Ben Elvin - Environmental Statement - "Chilton Woods mixed use development" - B/15/01718/OUT

Dear Mr Elvin

I acknowledge receipt of your council's email, dated 22 January, 2016.

We have no comments to make on this application.

Regards

Tab Omar

National Planning Casework Unit

Department for Communities and Local Government

5 St Philips Place

Colmore Row

Birmingham B3 2PW

Telephone: 0303 444 8072

BEL

Comments Received

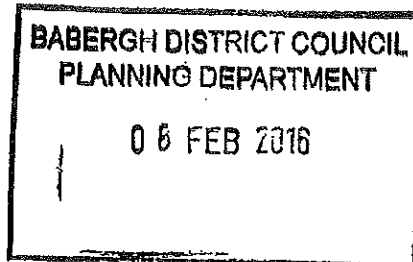
08/02/16

OFFICIAL



Suffolk Fire and Rescue Service

Babergh District Council
Planning Department
Corks Lane
Hadleigh
Ipswich
IP7 6SJ



Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref: B/15/01718/OUT
Our Ref: FS/F251605
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 03/02/2016

Dear Sirs

Chilton Woods Mixed Use Development, Land North of Woodhall Business Park, Sudbury
Planning Application No: B/15/01718/OUT

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

The following comment will need to serve all/any phases during this build proposal and any spine road please.

Suffolk Fire and Rescue Authority recommends that fire hydrants be installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

OFFICIAL

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

A large black rectangular redaction box covering the signature of the Water Officer.

Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr D Fovague, Amec Foster Wheeler, Gables House, Kenilworth road, Royal Leamington Spa, Warwickshire CB32 6JX

Enc: Sprinkler information

From: Andrea Stordy
Sent: 17 May 2017 14:22
To: Planning Emails
Subject: FAO: Paul Hankins

Planning Application: B/15/01718/OUT
Location: Chilton Woods, Mixed Use Development, Land North of Woodhall Business Park, Sudbury

Good Afternoon,

Thank you for your letter of 15/05/2017.

Please be advised that we have made formal comment on planning application B/15/01718/OUT, which we note has been published. This may remain in place for the revision/additional information.

If you have any queries, please email them to water.hydrants@suffolk.gov.uk, quoting Fire Ref.: F251605.

Kind regards,

Sent on behalf of the Water Officer

Andrea Stordy
BSC
Admin to Water Officer
Engineering,
Public Health and Protection
Suffolk County Council
3rd Floor, Lime Block
Endeavour House,
Russell Road,
IP1 2BX

Tel.: 01473 260564
Team Mailbox: water.hydrants@suffolk.gov.uk

From: Paisley, Matthew
Sent: Fri, 5 Feb 2016 20:48:39 +0000
To: Planning Emails
Cc: Claire Austin
Subject: FW: Planning Consultation Request from Babergh District Council. Ref: B/15/01718

Planning,

Recent evidence on new build estates already tells us that residential parking, and parking around new schools, is not adequately catered for at point of planning. I note from the plans that the new school will be close to the new centre and I think the potential parking issues need to be looked at now, along with the number of spaces allocated per property.

The planners need to think very seriously about where multiple vehicles will park on the estate, and the impact this will have on the industrial areas, deliveries and safety of the school children.

Aside from that, no comments.

Matt

PS 1455 Matt Paisley
Sudbury & Great Cornard, and Babergh West Safer Neighbourhood Teams

Sudbury Police Station
Suffolk Constabulary

Acton Lane

Sudbury, Suffolk. CO10 1QN

Tel. 01986 835424
www.suffolk.police.uk

From: Paisley, Matthew
Sent: 19 May 2017 14:50
To: Planning Emails
Subject: FW: Planning Re-Consultation Request from Babergh District Council. Ref: B/15/01718

Good afternoon,

My observations from a local policing perspective of these revised plans are as follows:

- Given the close proximity of the housing to the proposed industrial units, I would like to see appropriate signage and road furniture that actively encouraged larger vehicles/lorries from driving through the housing areas. Drivers could accidentally access the housing areas as opposed to driving directly into the industrial zones.
- Appropriate off street parking should be considered, particularly around the school and village centre. Those that do not live in the immediate vicinity will undoubtedly use vehicles thus causing congestion and parking complaints.
- The industrial areas could be a draw for anti-social behaviour & anti-social use of motor vehicles. Measures should be taken to discourage these activities and consider layout ideas at this stage that would actively reduce the risk of the road being used as a race track out of business hours.

Best regards

Matt

Matt Paisley

Police Sergeant 1455

Sudbury Safer Neighbourhood Team

Suffolk Constabulary

Police Station

Sudbury, Suffolk, CO10 1QN

Tel: 01284 774314

www.suffolk.police.uk

From: planning.control@babergh.gov.uk [mailto:planning.control@babergh.gov.uk]
Sent: 13 May 2017 14:10
To: Austin, Claire
Subject: Planning Re-Consultation Request from Babergh District Council. Ref: B/15/01718

Application No: B/15/01718/OUT
Location: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury
Proposal: Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village

Economy, Skills and Environment
6 The Churchyard, Shire Hall
Bury St Edmunds
Suffolk
IP33 1RX

Christine Thurlow
Corporate Manager- Development Management
Planning Department
Babergh District Council
Corks Lane
Hadleigh
Ipswich IP7 6SJ

Enquiries to: Kate Batt
Direct Line: 01284 741277
Email: kate.batt@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2015_01718
Date: 24th February, 2016

For the Attention of Ben Elvin

Dear Ms Thurlow

Planning Application B/15/01718/OUT – Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park: Archaeology

The proposed development affects an area of extremely high archaeological potential, as recorded on the County Historic Environment Record (HER).

SCCAS previously advised that a geophysical survey and archaeological trenched evaluation should be undertaken in advance of submission, to inform determination of the application in accordance with NPPF policies relating to the historic environment. The result of these investigations provides information on, and assessment of, the significance of heritage assets with archaeological interest likely to be impacted by the development as proposed. This archaeological fieldwork has now been completed and reported upon (Green, M. 2015, Archaeological Evaluation and Geophysical Survey at Chilton Woods, Sudbury, Suffolk).

Several areas of significant and extensive archaeological remains were identified across the site, including evidence of later Prehistoric, Roman and Medieval occupation. The evaluation also identified a number of more discrete areas with archaeological interest, including a small number of cremation burials of Bronze-Age date.

It was not possible to evaluate a small proportion of the site due to issues around access, and further areas have been identified which may be subject to ground disturbance in connection with landscaping, ancillary development and SUDS. Based on the results across the rest of the site it is unlikely that archaeology in these areas will represent a major constraint on the design of the development as proposed. However, these areas will need to be archaeologically evaluated, and a programme of archaeological mitigation agreed prior to the commencement of development (including landscaping, SUDS etc.).

The proposed development would cause significant ground disturbance that has potential to damage any archaeological deposits that exist.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. Therefore, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following conditions would be appropriate:

1. No development shall take place within each phase or sub-phase until the implementation of a programme of archaeological work for that phase or sub-phase has been secured, in accordance with a Written Scheme of Investigation for evaluation, and where necessary excavation or other mitigation, which has been submitted to and approved in writing by the Local Planning Authority.

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

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied within each phase or sub-phase until the site investigation and post investigation assessment for that phase or sub-phase has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

In this case, a programme of archaeological mitigation, including substantial areas of open area excavation, will be required in order to address the impact of development on the archaeological interest of the site. It would be advisable to undertake this at an early stage of each phase of the development. Archaeological remains have the potential to be complex and could represent substantial financial and time commitment. Although unlikely, it is also possible that discrete features may be encountered that warrant preservation *in situ*. It is anticipated that if this is the case that preservation could be facilitated by minor amendment to design and consent.

I would be pleased to offer guidance on the archaeological work required and, in my role as advisor to Babergh District Council, I will, on request of the applicant, provide a brief for each stage of archaeological investigation so that estimates of costs and time can be obtained from contractors. Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/libraries-and-culture/culture-and-heritage/archaeology/>

I would also advise that Historic England are included in all discussions, as issues around settling of designated assets may represent a significant constraint on the design of the development as proposed.

Yours sincerely

Kate Batt BSc (hons)

Senior Archaeological Officer
Conservation Team

BEL



Historic England

24.02.16

EAST OF ENGLAND OFFICE

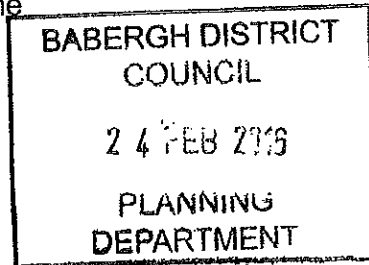
COM

Mr Ben Elvin
Babergh District Council
Council Offices, Corks Lane
Hadleigh
IPSWICH
IP7 6SJ

Direct Dial: 01223 582710

Our ref: P00496932

10 February 2016



Dear Mr Elvin

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015

CHILTON WOODS MIXED USE DEVELOPMENT, LAND NORTH OF WOODHALL BUSINESS PARK, SUDBURY, SUFFOLK
Application No B/15/01718

Thank you for your letter dated 22 January notifying Historic England of the Outline Planning Application for the erection of up to 1,100 dwellings, employment land, and associated development on land to the north of Sudbury, Suffolk; this is known as the Chiltern Woods development.

The development as a whole is likely to remove all traces of the medieval landscape within the application site and together with the scale and size of the buildings for the industrial zone, would have an adverse impact upon the significance of the Registered Park and Garden and house of Chilton Hall, Wood Hall Moat, and the buildings and precinct of St Bartholomew's Priory, and the house known as Long Wall, which would result in harm to these heritage assets.

Whilst we do not object to the overarching principle of this development, we do have a number of concerns about the impact of the development upon the significance of these assets. We also have concerns about the information provided with in the Environmental Statement. We consider that at present the application would fail a number of policies within the National Planning and Policy Framework and these concerns need to be addressed prior to the outline permission being granted. At this present time, we recommend that the application is refused.

Historic England Advice

Historic England (formerly English Heritage) has made comments in relation to this project on a number of occasions, since it was initially conceived. More recently we



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

have commented on the first iteration of the masterplan in April 2012 (our reference P00129630), and we have attended a number of meetings with the applicant and the planning authority over a four-year period. We have also provided written advice in relation to the emerging masterplan, and provided a scoping letter, dated June 2014 in relation to an EIA screening request PA00291225, PA00338765 & PA00355351.

Historic England has identified that in addition to non-designated archaeology known from within the development area, there are a number of significant designated heritage assets situated close to the development area. This includes the Registered Park and Garden (RPAG) which surrounds the grade II* listed Chiltern Hall at the eastern end of the development area. The Moated site of Wood Hall, a scheduled monument located on the southern edge of the development within Woodhall Business Park, and to the west, on the south side of Springslands Way a cluster of heritage assets which includes the chapel of St Bartholomew (scheduled monument and listed at grade II*), which is located in association with a grade II listed farmhouse. These sit within the precinct of a former medieval priory. Although the precinct is not designated in its own right, its association with the monastic site makes this a non-designated heritage asset of high significance. To the north of the development area is an unusual modern house known as Long Wall, which is listed at grade II. The development area is also characterised by a landscape (primarily field boundaries and ditches), which dates to the medieval period and is linked in terms of setting to the St Bartholomew's chapel and Wood Hall moat. These assets, the impacts, and issues are discussed in more detail below.

Chilton Hall is a fine grade II* listed house in a designed landscape setting. It was built between 1550 and 1560 on the site of an earlier medieval house and sits within a wide, well defined moated enclosure. The Hall was destroyed by fire c. 1800 leaving only the east wing, which stands today. This is a red brick two-storey dwelling with attics and cellars. The park and garden (registered at grade II) is an early C16 or C17 walled kitchen garden beside the house with the addition of sunken rose garden and a woodland garden, which were added in the 1930s. Part of the C16 garden wall to the east is separately listed at grade II.

In previous iterations of the masterplan we have been concerned about the impact of a service road and access into the development, which would have been situated adjacent to the park. We note that this is no longer part of the scheme and this is welcomed. The principle remaining concern is therefore the impacts on the setting of the house and gardens from development to the north.

We appreciate that the heritage chapter within the Environmental Statement (ES) has identified that the group of heritage assets here are of high significance (See paragraph 11.10.34), and has provided a detailed description of the property and its setting. We appreciate that the effects on the setting have been considered; however this focuses mainly on views from the park to the south-east towards the



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

church. We contend that the rural areas to the north and west of the site are also an important element of the setting of the hall, park and gardens, particularly as this forms the backdrop to the principle entrance and exit to the hall. The views therefore would be considered to contribute to its significance and protecting this part of its setting would need to be an important consideration for this scheme.

We also appreciate that the ES does include at least one dedicated viewpoint (see figure 10.16), which shows the boundary between the park and the development to be wooded; although this appears to be thin and relatively porous, particularly in the winter view (as shown). The mitigation component of the ES is however confusing. Paragraph 11.10.44 states that '*environmental measures to mitigate the effects... are set out in table 11.2*'. Table 11.2 however states that no mitigation is necessary. This conflict requires resolution prior to determination of the outline application, and appropriate mitigation needs to be specified.

Long Wall is a grade II listed house to the north-west of the development, and it is one of the few modern post-war houses to have been given listed status. Designed in 1963 by the architect Philip Dowson, it is a single storey pavilion style building with an over-sailing roof and significant quantities of glazing on the principle sides. It is described as a '*distinguished and much published weekend house of simple elegance*' and that the architect intended the house to represent '*simplicity in a meadow*'. He also stated that he intended the house to establish '*a relationship between the hearth and the horizon*'. The very rural setting is therefore a conscious part of the building's function and design and contributes to its significance.

Our primary concern here is how a large-scale development, particularly the industrial/employment component, would look within the setting of the house. In particular that the masterplan has indicated the presence of two vast buildings situated within the core of the employment area. We note the absence of a viewpoint from this asset and that the ES does not illustrate the views from the house that contribute to its significance and form part of its design ethos. We would expect the applicant to establish the key views from the house, explore the relationship between the house and the development and the likely extent to which this development would be visible. This should be modelled with a viewpoint and a photomontage or wirescape taken in winter.

Wood Hall Moated Site is a well-defined and substantial medieval moat, which was once associated with, and presumably surrounded, a manor house known as Wood Hall. The site remained largely intact with a principle dwelling, gardens, an orchard and associated buildings until the 20th century and, although partly in-filled the moat and land associated with the house and farmyard have survived. What is visible on site is the moat, traces of the brick revetments associated with the principle building and some remnants of the farm buildings. The moat and buildings shown on the map hint to the kind of status the site must have once had. In spite of the development of



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

the industrial estate that surrounds the moat on three sides, there is a gap on the eastern side, and it is possible to understand the site in its historic context. The site, as we have previously stated is on the Historic England Heritage @Risk Register (HAR) at high risk and we accept the monument is not in the best condition. It is overgrown and there are problems with illegal fly tipping, litter and other anti-social behaviour. Simple vegetation clearance would enable the moat to be clearly visible. The significance of the site lies with the surviving form of the moat, its presence in the landscape, and the archaeological survival. It has a high historic, evidential, communal and social value

The ES (see chapter 11.4.21) wrongly states that the moated site is wholly within the industrial estate. This is clearly not true, as the industrial estate surrounds the site on three sides with the only remaining untouched aspect of the setting facing to the north. This is clearly illustrated in the LVIA (see viewpoint 13, Figure 10.28), which demonstrates that, although overgrown, this northern view is the last surviving aspect, connecting the medieval manor with its hinterland and the countryside in which it once stood. Whilst the modern development of the industrial estate has affected the degree to which the setting of the asset contributes to its significance, it has not obliterated it altogether. If anything the development on the three sides of the site increases the importance of the undeveloped side to the north.

We have a considerable concern about the type, scale and mass of the development proposed for the land to the north of Wood Hall, with the masterplan indicating that this land is allocated for employment use. Development which is large and industrial in character would further enclose the monument, and would impinge upon, and further erode its setting. The development would ensure that the monument survives only as small green space entirely surrounded by industrial units which would have their backs turned on the monument. This area of land would be further at risk from illegal fly tipping and anti-social behaviour and create a piece of land which is poorly understood and unappreciated. We therefore consider that ES has failed to adequately assess the status and significance of the asset and its setting has been dismissed as irrelevant. The ES has also failed to adequately consider the impact of the development upon the monument and we content that the development would bring harm to the significance of the asset through an inappropriate scale and type of the development within its setting. We also consider that the ES has failed to establish suitable mitigation for the monument. Screening is not sufficient in this case and, as noted in a recent appeal decision (Beeston Regis, Norfolk), the screening would in itself increase the harm to the significance of the asset.

St Bartholomew's Chapel is situated at the western end of the development and lying to the south of the A134. This was a medieval monastic establishment, which dated to the early C12. The surviving upstanding component of the site includes the former chapel, which is both a scheduled monument and listed at grade II*. This sits within a group of buildings known as St Bartholomew's Priory Farm, with the post-dissolution



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

farmhouse also listed at grade II. The grade II* C14 barn associated with the priory was recently lost to fire. The extent of the site is not fully known, however it is thought to be a monastic cell of the Benedictine order and subsidiary house of Westminster Abbey. The records suggest other monastic buildings such as the Priors Lodging were demolished in the C18. The available evidence suggests that the site had a higher status than that of a regular monastic grange as stated in the ES (see chapter 11.10.41) and the surviving buildings are of national importance, again not as is stated in the ES (see 11.10.47), which says they are only of 'local historic interest'. We would challenge this assessment and consider the site to have high historic, evidential, communal and social value. The chapel itself is a fine surviving monastic building of considerable value in its own right.

The chapel and farmhouse both sit within a parcel of land, which is thought to equate to the medieval monastic precinct, evidence for which was established during an evaluation in 2004-5. Although cut by feeder roads to the nearby housing estate and the A134, the precinct area is still clearly defined within the landscape, and the boundaries appear to respect the surviving field boundaries. Part of this precinct is thought to lie to the north and would be within the development area. The precinct is not designated but it forms part of the setting of the designated heritage assets at St Bartholomew's Farm, and is an important non-designated heritage asset.

The Historic Landscape features (Hedgerows) section within the ES (see chapter 11.4.16) is an important inclusion, and we support and encourage the retention of important hedgerows. The importance and age of field boundaries in Suffolk, and their role in the landscape, were recently tested at public enquiry (Eye Power Station), which supported an approach that sought to protect them. We therefore note with concern the statement in the last paragraph of 11.4.16, which states the important field boundary associated with St Bartholomew's priory would be removed. We would like to see this boundary retained, in particular the section from the entrance to the supermarket going west. This, and its value are explored in the section above, but we consider that this is an important landscape feature associated with the former monastic site. It could easily be retained in any development and we would recommend that the design is amended to incorporate this.

Planning policy

Although we do not object to the development in principle, there are a number of elements of the masterplan that raise concerns in regards to the historic environment in relation to planning policy. The relevant policies are noted and are explored in relation to individual heritage assets below.

Paragraph 126 of the National Planning and Policy Framework states that '*Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats... and that local planning*



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

authorities should take into account:

- 1) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*
- 2) *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- 3) *the desirability of new development making a positive contribution to local character and distinctiveness;*
- 4) *opportunities to draw on the contribution made by the historic environment to the character of a place.'*

We recognise that this masterplan is part of a large housing and land allocation and which makes a significant contribution to the housing numbers within the Babergh District Council local plan (see allocation CP01), Although planning policy has moved on since the document was adopted, the policies (see CP14, 15, 16, and 17) are all of relevance in relation to the NPPF paragraph 126, and of importance in relation to the formulation of the masterplan. Two of the sites noted above (Wood Hall and St Bartholomew's Chapel) are on the Heritage at Risk register at high risk and the Wood Hall monument is owned by Babergh District Council. The risks to these assets are from anti-social behaviour, neglect and vandalism (see in relation to the arson attack on the grade II* barn which once stood in St Bartholomew's Farm). The policies, particularly CN16 and CN17, encourage owners and developers to conserve and enhance scheduled monuments and these policies also include reference to conserving their setting. In addition CN15 makes reference to preserving and enhancing the character of Registered Parks and Gardens.

We find therefore that the application risks being contrary to the policies CN16 and 17 in relation to the Wood Hall and St Bartholomew's Chapel scheduled monuments and there are concerns about the setting of the park and garden at Chilton Hall, which is relevant to policy CN15

We recognise that issues with regards to the protection and enhancement of the scheduled monument can be addressed within the masterplan and we consider that this application would in its current form be actively harmful to these assets. We conclude that the application therefore must also be contrary to paragraph 126 of the NPPF. The issues raised in paragraph 126 needs to be further addressed and explored in the ES. It is very clear to us that the historic environment particularly Wood Hall could make a '*positive contribution*' to the development is we would like he ES to develop further of how the historic environment could develop ideas of place making, character and distinctiveness. These issues are also raised in relation to paragraph 131 of the NPPF and we feel that the application falls short of the desire to '*sustaining and enhancing the significance of heritage assets*' that the masterplan does not consider fully the '*positive contribution that conservation of heritage assets can make to sustainable communities*'



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

Paragraph 128 of the NPPF details information requirements and we find that although the ES is full and comprehensive, it fails 128 in a number of areas (see detailed below). Paragraph 132 requires the planning authority to place great weight on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be. It also recognises that '*any harm or loss should require clear and convincing justification*'. Paragraph 134 recognises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be outweighed by the public benefits of the proposal.

Paragraph 135 requires the planning authorities to consider the impact of a development on the significance of non-designated heritage assets and weigh the balance with regards to the scale of any harm or loss. Furthermore paragraph 137 says that local planning authorities should look for opportunities to enhance or better reveal the significance of heritage assets when considering development in their setting.

Given the importance of Chilton Hall we would recommend that any development should have adequate regard to preserving or seeking to enhance the setting of heritage assets as discussed in the National Planning and Policy Framework and any landscape enhancements and improvements needed to help screen or protect the setting should be clearly defined at this stage. If mitigation is required then it needs to be specified in the ES, and we would recommend that additional planting and screening is included in the proposal. This would help to strengthen this boundary and protect the setting of the Hall and Gardens

Clarification is also sought in relation to the current status of the area of land known as the 'Bird' land. We assume this is now excluded from the development because it was not included in the masterplan. Clarity is however needed on this point.

In relation to Long Wall there is insufficient analysis in relation to the setting. There is no analysis of what are the critical views, and no viewpoint or photomontage to illustrate this. We therefore consider that the application fails paragraph 128 in relation to this asset and an additional viewpoint and wirescape is requested in relation to this asset, along with additional analysis of the impact upon its setting. This will enable a determination of the loss, benefit or harm of the development in relation to paragraphs 132 and 134.

In relation to Wood Hall Moated Site we consider that the development fails to satisfy the policy tests in the NPPF in a number of ways. We do not consider that the ES provides a suitable assessment of, or seeks to adequately justify the harm to the significance of the heritage assets. The ES therefore fails paragraph 128 in regards to this asset. Paragraph 131 also says that in determining planning applications, local planning authorities should take account of '*... the desirability of sustaining and*



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'.

Furthermore we consider that the development would represent harm to the significance of the site through an inappropriate development within its setting. Paragraph 132 says that 'any' harm requires justification and that 'great weight' needs to be applied to the monument in terms of decision making in relation to a development, which would have an impact upon its significance. The development would in our view fail paragraph paragraphs 132 and 134 in relation to this asset

We would recommend that use of the area immediately to the north of the heritage asset is re-considered. In particular, we would request that the masterplan is amended to move a section of the employment land away from the monument and replace it with an allocation of housing and a larger allocation of green space (greater than is currently shown). The site would benefit from being incorporated into a wider defined green space strategy, with linked footpath access from the development to Sudbury in the south. Any houses should face the scheduled monument to ensure a sense of place is developed and ownership is created. To offset the harm to the monument some enhancement and benefit must be afforded and we would therefore recommend that s.106 or CIL levy be afforded to the monument for the restoration of the monument and for improvements in its management. The ES should be explicit about how improvements to it setting would be achieved.

We have strongly advocated for this position in previous letters and we confirm that we support the removal of vehicular access in through the designated heritage asset but we would not object to foot or cycle paths into the development at this point provided that it is part of a coherent network of footpaths.

The surviving monastic precinct and the landscape around it form part of the significance of the designated heritage assets of St Bartholomew's chapel and the listed farmhouse. This contributes to the setting of the site. Although the outlook from the buildings has clearly been changed by the housing developments that surround the site, they have not fully divorced the heritage assets from their context. Our primary concern in relation to these assets is to protect the setting of St Bartholomew's chapel, and the hedgerow boundaries, which we consider to have been associated with the priory precinct. We would like to ensure the boundaries are fully assessed and that they survive within the development. Specifically, the most prominent boundary that we would like to see preserved is the large bank and ditch that runs eastwards from the access road to the existing supermarket. This is a marked earthwork feature with a wide earthwork bank, and where it reaches the corner a wide deep ditch also survives.

Further concerns are raised by the allocation of this part of the site for a landmark hotel development. A prominent building here would be situated on the rising land, and

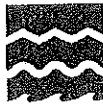


24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

would be designed to have a highly visible character. This has the potential to be highly visible from the monument and potentially harmful to the significance of the heritage assets.

In policy terms this would be contrary to the policies 132 and 134 of the NPPF. We would like to see a better use for this key area of land, and policies within the planning application that restrict the height of the buildings.

Non-designated heritage assets; we can confirm that there are no designated heritage assets within the development area, but the ES clearly shows the land has a high archaeological potential. A full programme of archaeological works will be necessary as noted in paragraph 141 of the NPPF. Advice on the level and type of mitigation would need to be sought from Suffolk County Council Archaeological Service and secured appropriately through the planning process.

Recommendation

Whilst we do not object to the overarching principle of this development, we do have a number of concerns about the impact of the development upon the significance of the designated heritage assets. We also have concerns about the information provided with in the Environmental Statement.

We recognise that considerable effort has been taken by the applicant to provide information within the ES for the historic environment, in particular for the designated heritage assets adjacent to the development. The evaluation strategy for non-designated assets has also been good. Overall however, we have found that the LVIA is not fully integrated or referenced within the Historic Environment Chapter, as suggested in our guidance. We have also made a number of recommendations in this letter, which relate to specific issues that we have identified with the ES. In summary, for Chilton Woods there are issues within the ES over the assessment and mitigation strategy for the asset. We consider that further work would be needed to improve the screening to the north of the Registered Park and Garden. With the Wood Hall scheduled monument we have raised considerable concerns about the analysis of the assets setting, and we find that the ES fundamentally fails to address issues relating to the impact of the development on its significance. It also needs to consider enhancements, and provide for the assets conservation. We request that revisions are made to the masterplan to improve this situation, and that more consideration is given to the asset within the overall development. For the house known as Long Wall, further information needs to be provided in relation to the impact of the development on the significance of the site, and for St Bartholomew's Chapel we feel the analysis of the significance of the asset needs to be revisited. Specifically, the ES has not fully addressed the impact on the setting of the assets from the landmark hotel development. Overall, we support the inclusion of analysis of the historic landscape within the ES (specifically the hedgerows) but we consider that the importance of the boundary adjacent to the Tesco's site has been missed. This is a likely to have been a



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

precinct boundary of the medieval monastic site and it needs to be preserved and protected within the development.

We therefore conclude that as it currently stands, the application would fail a number of policies within the National Planning and Policy Framework and these concerns need to be addressed prior to the outline permission being granted. At this present time, we recommend that the application is refused.

Historic England would be happy to provide further advice and please do not hesitate to contact me should you wish to discuss any issues further.

Yours sincerely

Will Fletcher

Inspector of Ancient Monuments

E-mail: will.fletcher@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

Mr Steven Stroud
Babergh District Council
Corks Lane
Hadleigh
IP7 6SJ

Direct Dial: 01223 582710

Our ref: P00496932

20 July 2017

Dear Mr Stroud

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CHILTON WOODS MIXED USE DEVELOPMENT, LAND NORTH OF WOODHALL
BUSINESS PARK, SUDBURY, SUFFOLK
Application No. B/15/01718**

Thank you for taking the time to repond to my e-mails. We offer the following advice on the proposed development at Chilton Woods.

Summary

Our attention has been drawn to the technical reports and letter from AMEC Foster Wheeler in relation to the most recent round of consultation and most recent version of the plan. This is currently available to view on your website. In particular, we have a specific interest in the section that responds to Historic England's previous comments. As discussed we are not aware of a further round of formal consultation and we therefore felt it was worth offering observations and final comments at this stage. These comments are primarily aimed at safeguarding the designated heritage sites and other important historical features, as part of this development.

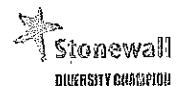
Historic England Advice

We have reached a position with the applicant where we have accepted the development in principle however there is still in our view likely to be a degree of harm to the significance of the heritage assets from the inevitable change to their setting (as per paragraphs 132 and 134 of the NPPF). We have always said that the balance in historic environment terms is between reducing harm through changes to the design and through enhancement or mitigation (as set out in paragraph 137). We therefore need to be convinced that the discussions that we have had with the applicant about design changes and mitigation can be safeguarded through the planning consent process, and translated into real positive actions, particularly in a situation where conditions would need to be discharged prior to the project moving forward. This is essentially about ensuring that suitable conditions are in place that reinforces protection for the historic environment, and those that safeguard the master plan design and layout changes needed to protect the historic environment. It is also about

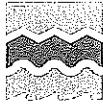


24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

making sure the s.106 agreement is fit for purpose in heritage terms. There are a couple of more specific concerns set out below.

Chilton Hall (Registered Park and Garden and highly graded Listed Buildings)

Although the applicant has stressed that visibility is likely to be limited because of the distance from the registered park and garden and listed building, and because the area known as the 'Bird land' is no longer included in the Chilton Woods development area, our view has always been that the setting of the Registered Park and Garden and listed buildings would best be protected through the addition of planting/screening within the development. This is along the development edge nearest to the designated features. A planting buffer would help to reduce the visibility of the new development. There also needs to be a dialogue between Chilton Woods Development and the Bird land development (which would be directly opposite Chilton Hall), to ensure that a consistent approach is taken to screening and buffers in both developments. The birdland scheme would also need to include a buffer along Waldringfield Road to complement and support planting buffers in the Chilton woods development. We are therefore seeking assurances that the planting needed to protect the Park and Hall can be secured through conditions, and the creation of this feature would be included within the Construction Environmental Management Plan (CEMP). We would also need to pick up this theme in the bird land application in due course.

Wood Hall Moated Site (Scheduled Monument)

We are aware that there are a number of changes in the vicinity of the designated heritage asset that arise from a variation in the masterplan. These are in part based on comments we made in relation to improvements to the setting of the Wood Hall Moated site. We are supportive of the approach to add an additional block of housing to the north of the moat and to place these houses so as to create an active settlement frontage that faces the monument. We also however require the development to deliver better management and interpretation for the monument itself by way of enhancement and as mitigation to the changes in its setting. We are therefore seeking assurances that the design and layout, including the buffer between the monument and development can be secured by condition. We are also seeking assurances that there will be an opportunity to influence the design of the housing block that faces the monument once outline permission has been granted and that the final design of this area will be consulted upon in the full application stage.

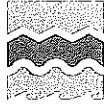
I'm sure you are also aware that the Wood Hall moated site is owned by Babergh DC and is on the Historic England Heritage at Risk Register at high risk due to its current poor situation and condition. The primary risk factors are overgrown vegetation, fly tipping, littering and other anti-social behaviour. Addressing these issues as part of on-going management would be essential to delivering the enhancement and to balance the public benefit required to offset the harm under the NPPF. The applicant has not to my knowledge addressed mitigation for Wood Hall and I am also concerned that this is not a specifically named part of the s.106 agreement. We would therefore like the



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

council to consider conditions requiring the production of a Management Plan and the delivery of a programme of works to this monument, as well as ensuring that there is a decent package of interpretation and heritage specific works is included in the s.106. In some respects the overall heritage offer could be improved within the s.106 for the development as a whole.

St Bartholomew's Chapel (Scheduled Monument and non-designated heritage asset)

We were pleased with the position that AMEC Foster Wheeler adopted in the ES Addendum with regard to the hotel and with the outcome of their analysis into the theoretical height and visibility of the buildings. The proposal would have reduced visibility from the scheduled monument and the non-designated precinct boundary of the priory site would also be protected in the masterplan layout. This latter feature survives as a relict field boundary (hedge, bank, ditches and ponds) within the development area itself close to the entrance with the Tesco's supermarket. Retaining the field boundary, with its bank and ditch in situ is a critical part of reducing the harm to and safeguarding non-designated but important heritage features. The ES notes that the design, layout and building heights and protection of the boundary can all be controlled by way of a planning condition. We are therefore seeking assurances that this can be done. We would also recommend that this field boundary and its conservation and retention could also be drawn into the CEMP.

Historic Hedgerows (non-designated heritage asset)

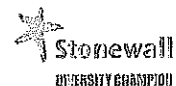
We also note the comments in the ES addendum about the retention of other historic surviving hedgerows, and we are therefore seeking assurances that this can be achieved and the council would support the creation of conditions to protect these features and incorporation into the CEMP.

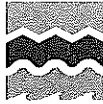
Please let me know if you want to discuss anything I have mentioned or need further support in these matters. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 132, 134 and 137 of the NPPF. In determining this application you would also need to bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. If there are any material changes to the proposals, or you would like further advice, please contact us in due course.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

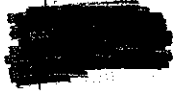




Historic England

EAST OF ENGLAND OFFICE

Yours sincerely



Will Fletcher

Inspector of Ancient Monuments

E-mail: will.fletcher@HistoricEngland.org.uk

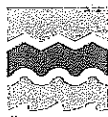


24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

Mr Steven Stroud
Babergh District Council
Corks Lane
Hadleigh
IP7 6SJ

Direct Dial: 01223 582710

Our ref: P00496932

3 October 2017

Dear Mr Stroud

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CHILTON WOODS MIXED USE DEVELOPMENT, LAND NORTH OF WOODHALL
BUSINESS PARK, SUDBURY, SUFFOLK
Application No. B/15/01718**

Thank you for your letter of 15 September 2017 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

We appreciate the opportunity to review and comment upon the above application. Please see also my letter to you in July of this year, where we set out our remaining issues with regards to the designated heritage assets.

Historic England Advice

As discussed in our letter of July 2017 and in other previous correspondence we have broadly accepted the application and can confirm that the concerns we have previously raised in relation to the designated heritage assets have largely been addressed by the applicant. There is still in our view likely to be a degree of harm to the significance of the heritage assets from changes to their setting, particularly Wood Hall moated site and to a lesser extent St Bartholomew's priory. The balance between public benefit and harm (as set out in paragraphs 132 and 134 of the NPPF) would therefore be provided by affecting positive change and enhancement to designated assets through mitigation and design (as set out in paragraph 137). There are therefore a number of remaining issues on which we would want further clarification before accepting that the policy tests have been met. These are set out below.

St Bartholomew's Chapel (Scheduled Monument and non-designated heritage asset)

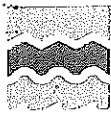
We note the ES addendum acknowledges the potential impact from the development of the hotel complex at the western end of the development area upon the significance and setting of this designated heritage asset. The ES has indicated that lower height



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

buildings would not be visible from the priory site and has proposed a draft condition to control the building heights of the hotel, to ensure that this is maintained. We are happy to agree this as mitigation and we are therefore seeking assurances from the planning authority that this condition is acceptable and that you would be willing to apply it to manage the building heights.

As discussed in the ES the hotel development is also acknowledged to be within the former precinct of St Bartholomew's Priory. The surviving hedges and boundary earthworks that formed part of the precinct of St Bartholomew's priory have been earmarked for protection during the development. This is also noted in the ES addendum. The precinct survive as a relict field boundary and consists of the hedge, a bank, large field boundary ditches and a pond, which are close to the entrance with the existing supermarket. As these features are relate to the priory, they are important but are non-designated heritage assets. Our view is that retaining the field boundary, with its bank and ditch in situ is a critical part of reducing the harm to and safeguarding heritage features, and we are seeking assurances from your authority that these features can be protected and further detail about what the mechanism for protection is going to be. We understand that the use of a Construction Environmental Management Plan (CEMP) is being considered and would support that approach.

We also noted in our July correspondence the comments in the ES addendum about the retention of other historic surviving hedgerows, and we are therefore seeking assurances that these features will also be protected and that their preservation can be achieved. We would support the creation of conditions to protect these features.

Wood Hall Moated Site (Scheduled Monument)

As we discussed in our last correspondence the main area of concern for us lies with Wood Hall Moated site. This is designated as a scheduled monument and sits just outside of the development area to the south. It is however within the setting of the development, and the masterplan also earmarks the area immediately adjacent to the monument for future pedestrian and cycle access. This is an archaeological site that would also benefit hugely from improved management and is noted at high risk on our Heritage at Risk database, due to its poor situation and presentation.

We are aware that the amended masterplan has been modified in relation to our comments. This would add an additional group of housing to the north of the moat and the ES states that the houses would be designated so as to create an active settlement frontage that faces the monument. We are supportive of this approach; however we also require the development to deliver better management and interpretation of the adjacent monument by way of mitigation to the changes in its setting.

We accept that in terms of the NPPF this would be about balancing the harm against the public benefit of the scheme and the potential for mitigation and enhancement as set out in paragraphs 132, 134 and 137 of the NPPF. We are therefore seeking



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

assurances for your authority that the design and layout, including the buffer between the monument and development can be secured by condition. We are also seeking assurances that there will be an opportunity to influence the design of the housing that faces the monument once outline permission has been granted.

We are also seeking clarification that improvements to the management of the monument will specifically be addressed by the S.106 agreement. We specifically ask that a sum of money be allocated to improving the management of the monument, for interpretation and to help root the monument in the development as a community asset. This needs to include a management plan, as well as tree clearance, scrub management, removal of the litter and rubbish, improved access and new interpretation.

Please can you confirm to us that this has been considered and that the management of the monument will be a part of the s.106 agreement, or that the council would be able to place conditions on the application that requiring the production of a Management Plan and the delivery of a programme of works to enhance this monument?

Recommendation

Historic England has concerns regarding the application on heritage grounds and we are seeking clarification from your authority on a number of points (set out above), and we also seek confirmation that relevant safeguards are in place to protect the heritage assets. These clarifications are needed to ensure the application meets the requirements and policy tests set out in the NPPF, in particular paragraph numbers 132, 134 and 137.

Yours sincerely

Will Fletcher

Inspector of Ancient Monuments

E-mail: will.fletcher@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Consultation Response Pro forma

1	Application Number	B/15/01718 Chilton Woods. Land north of Woodhall Business Park, Sudbury	
2	Date of Response	16.8.2017	
3	Responding Officer	Name:	Jonathan Duck
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	1. The Heritage Team considers that the proposal would cause a very limited degree of harm on the spectrum of 'less than substantial harm' to the various designated and undesignated heritage assets – though this could be mitigated to a good degree through careful planting schemes.	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	This development is for up to 1150 houses, two schools, and various employment units. The issues of heritage concern involve the impacts of the development on the significance of the Chilton Hall designated asset, and the non-designated asset known as St Bartholomew's Chapel. (It should be noted that HE concerns also encompass the SAM known as Wood Hall Moated Site, as well as the non-designated historic hedgerows). This iteration of the masterplan addresses some of the concerns that HE mentioned previously and, subject to conditions requiring a comprehensive planting scheme <i>within</i> the site to protect the Chilton Hall group of buildings, and a protection of the boundary surrounding St Bartholomew's Chapel, both as requested by HE, the Heritage Team would not object to the proposed development.	
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

7	Recommended conditions	Planting schemes as above

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

From:Jonathan Duck
Sent:5 Oct 2017 08:55:23 +0100
To:Steven Stroud
Cc:BMSDC Planning Area Team Green
Subject:B/15/01718 Chilton Woods Sudbury

Hello Steven,

The Heritage Team has no further comments to make in regard to the additional information contained within the Environmental Statement.

Joff

Dr Jonathan Duck BSc(Hons) MSc DipUD IHBC FRSA

Heritage Officer

Babergh District Council, Corks Lane, Hadleigh, IP7 6SJ

T: 01449 724526

E: Jonathan.duck@baberghmidsuffolk.gov.uk

W: www.babergh.gov.uk www.midsuffolk.gov.uk

Please note: I do not work on Fridays

Christopher Tucker

From: Lorna Hoey <lehoey@btinternet.com>
Sent: 16 March 2016 17:12
To: Planning Emails
Subject: Re: Chilton Woods Outline Planning Application no B/15/01718
Attachments: web-signoff-logo.gif; Babergh,Chilton Woods,The Sudbury Society Response.docx

Attn. Ben Elvin, Planning Dept.

Sir,

I enclose the response to this planning application from The Sudbury Society which I trust will be useful in making the vital decisions which will affect the future of our market town.

Lorna Hoey
Chair

CHILTON WOODS DEVELOPMENT

THE SUDBURY SOCIETY'S RESPONSE TO THE OUTLINE PLANNING APPLICATION B/15/01718

The Sudbury Society fully understands the need to expand the market town of Sudbury by the provision of further housing and employment. We believe this extension should be carried out so that it will be a seamless expansion of the market town and not the development of a conjoined village.

Although most aspects of the development will be reserved for treatment in detail we are concerned that they will be effectively constrained by decisions approved at Outline Planning stage. We are thinking particularly about the issues we raise below such as the spine road, access points, the siting of the industrial area and of the household waste site.

Our concerns with this application are:

- 1 The spine road will serve both employment and residential land, a retrograde step unlike other employment areas in the town.
- 2 The upgraded Acton Lane/Springlands Way junction is proposed to be traffic-light controlled which will cause congestion on Springlands Way.
- 3 The impact on the town of increased traffic entering and passing through it, which will put pressure on parking provision, increase congestion, pollution, and impose further damage to the historic spaces and streets. A recent survey showed Cross St as having the most air pollution in East Anglia. The proposed modifications to the MacDonalds roundabout will encourage more traffic along Waldingfield Road and East Street, already with more traffic than it can cope with. Parts of Waldingfield Road are barely wide enough for two vehicles to pass. A Western bypass will become essential by phase 3 of the proposals if this impact is to be minimised.
- 4 The location of the employment land with buildings potentially 15 metres tall is situated on the steepest sloping section of the site, not ideal for this type of development and the most visible section of the site from the surrounding countryside.
- 5 The proposed household waste site is located close to the entrance to the spine road serving quality employment land and one of the main accesses to the residential land.
- 6 The site roads and village centre location appear to show no reference to the existing surrounding housing areas which have no facilities.
- 7 There is no programme for the provision of school facilities early in the residential development phases.
- 8 Housing is shown as an artist's impression and does not indicate a quality development.
- 9 The site contains archaeologically important remains but there is no indication of how these might be protected at detailed application stage.

We make the following comments on how these issues might be addressed at both outline and detailed planning stages:

- 1 The employment land should be served by the existing use-specific roundabout access which serves the Woodhall employment area; to segregate commercial traffic flows from residential ones.

- 2 The Acton Lane junction with Springlands Way should be a roundabout as all other intersections on this road.
- 3 The process of bidding for the western bypass should be initiated now with an updated and projected traffic survey to assess what proportion of traffic, both through and town generated, would be expected to use it. The traffic generated by the proposed future development of 500 houses on land east of the Newton Road should be taken into account. How this development will be sustainable in the event of the bid being unsuccessful needs to be made clear.
- 4 To quote from the Transport Assessment included with the application documents – “the fundamental principle is to reduce the need to travel by car and ensure a modal shift towards walking, cycling and use of public transport.” How will the proposals meet these national and local planning objectives?
- 5 The location of the employment land with its 15 metre high buildings should be moved from the steeply sloping shoulder of the valley on to the more level land behind Tesco and the Woodhall employment area; they could also go at the far eastern edge of the development near the existing waste dump.
- 6 The household waste site should be sited at the eastern end of the site adjoining the existing haulage, waste, grain store and road surfacing business where it will have considerably less impact on the main employment area. It is immediately available and equally as accessible as the proposed location and not adjoining one of the main accesses to the residential land.
- 7 The location of the village centre should be moved so that it can serve and benefit from the existing housing areas along both sides of Springlands Way.
- 8 School and village centre facilities should be made available as this area develops and not left to be provided at the end of the development programme.
- 9 It should be noted at this stage that the artist’s impression shows the familiar developer’s solution of lavish, space-consuming roads, detached houses with gardens, with no indication of green layout and design, nor of varieties of procurement such as individual or group self-build, nor of scope for working from home, nor of children being able to play safely within sight of houses rather than being confined to play areas. There are examples of good housing layout and design which should be researched.

Lorna E Hoey

Chair

THE SUDBURY SOCIETY 16 MARCH 2016

23 March 2016

Mr Ben Elvin
Planning Officer
Babergh District Council
Council Offices
Corks Lane
Hadleigh
Ipswich IP7 6SJ

Dear Mr Elvin

Chilton Woods: Mixed Use Development, Land North of Woodhall Business Park, Sudbury, Suffolk.

B/15/01718 Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

I am writing on behalf of the Suffolk Preservation Society in connection with the above major application. The Society responded to the public consultation exercise in 2015 and is pleased to note that the proposed access road adjacent to the Chilton Hall which would have been situated adjacent to the registered park and garden has been removed. Nevertheless there remain a number of key concerns in relation to the scheme which, if approved, will impact negatively upon Sudbury and the wider historic environment:

The development vision for Chilton Woods is clearly set out on page 4 of the Chilton Woods Design and Access Statement, December 2015. When cross referencing the vision and the illustrative layout there appear to be a number of discrepancies which we set out below, together with our recommendations.

Urban and Landscape Design

1. Characterful mixed-use development exhibiting high levels of urban design quality

The aspiration for 'high levels of urban design quality' is to be commended; public sector owned sites should provide an opportunity to create developments which showcase both best practice design and place making principles. That said, the outline application as it stands offers very few assurances regarding how the residential and commercial areas will be developed to a) relate to the rural context, b) relate to the existing built context or c) relate to each development phase. The DAS does not provide enough detail or clarity to provide suitable guidance of the development.

We therefore recommend that detailed design criteria need to be embedded into the outline application; assuring design quality, coordination and control for the determination of the emerging planning applications. Design codes should be developed for both the residential and commercial areas as part of this application making reference to the following headings:

- Building Heights
- Building Form and frontage
- Street typologies (including crossing points, primary, secondary and tertiary routes)
- Building Materials
- Character areas and how they respond to the surrounding context
- Parking solutions whether situated adjacent to dwellings or as parking courtyards
- Signage
- Lighting for the external environment
- Public realm, green infrastructure, open space; design styles and materials
- Landmark buildings
- Boundary treatments; both hard and soft
- Landscape design including indicative structure planting mixes and suitable tree species to reflect local distinctiveness

2. Sustainable community: homes will be delivered alongside new local facilities and jobs

It is positive to see employment being considered as part of a large development proposal. The indicative masterplan includes a large commercial/employment area which consists of potential uses ranging from a household waste recycling area and a hotel. More clarity is needed regarding the potential future employment area, what the uses are and how compatible they are to each other and the surrounding residential areas.

We would also point out that Figure 2.2, Site location in the context of existing local facilities and services (within 2km of the site); page 13 of the DAS is inaccurate and misleading. The centre point of the radius is not located within the centre of the development site and incorrectly lists services and facilities with a 2km catchment area. This diagram should measure the services and facilities with 400m (5 minute walk) or 800m (10 minute walk) the recognised distances of sustainable movement.

3. Designed to foster a community spirit between future residents of the development as well as with existing residents of the area.

The interface between the existing development to the south of the site and the proposed development parcels need further consideration. In many cases, where the site abuts the back gardens of the existing residential areas, the indicative masterplan predominately shows open space between the existing and proposed development parcels. To establish appropriate links between the existing and proposed communities, the design and layout of the southern and eastern boundary needs to demonstrate a clear approach to integration; including the design of both strategic and area specific areas. Without a well-defined strategy for integration, by way of both road, footway and cycleway linkages the development will undoubtedly become a satellite estate of Sudbury.

4. Healthy environment to live and work in - set within an extensive network of community woodland and green spaces

The proposed green infrastructure promotes a wide range of green links and designations throughout the development, especially towards the northern edge of the site and between the residential and employment areas. The indicative/concept masterplan should be expanded to include a greater level of detail regarding the green space typologies. In many cases the areas labelled community woodland serve as landscape screening belts. There needs to be a clearer definition between the types of open spaces, structure/landscape mitigation planting and community woodland areas.

We note that some of the illustrative employment buildings sit close to planting belts which may prohibit good landscape development and enjoyable use of the spaces. Ensuring that all spaces have a clear use with sufficient space, including buffer zones to ensure this is achievable will be important.

A strategy for the open spaces/green space infrastructure including play space; in terms of design, detailed planting specifications, setting out, ownership and management will be essential in order to achieve a comprehensive scheme with 'best practice standards' across the site area. We would have concerns if the open space elements of the scheme were divested out to differing developers and management companies.

The green spaces will also need to incorporate SUDS drainage measures and we hope that these can be incorporated into attractive landscapes spaces.

5. Well connected to facilities with walking and cycling given priority as modes of movement

It is important to establish (and demonstrate) an achievable public transport route through the development. This route should provide access to public transport for the vast majority of the development, including the neighbourhood centre.

The small residential area to the east of the main development has the potential to be disconnected from the rest of the site, neighbourhood centre and other site amenities. The road layout in this location seems very inefficient and illogical; we would question why the masterplan includes this small residential parcel separated from the main development. The proposed allotment land in this location also appears to be detached and remote from the main development area. This is likely to result in allotment holders being reliant on car access which will undermine one of the

objectives of the development. Perhaps smaller allotment areas integrated within the development would be more successful than one placed on the edge of the site.

6. The development will be of a standard that it will be used as a good practice example across the County for planning and delivering large developments

The proposed character areas should relate to the existing context of the residential area to the south and east of the site, the character areas plan reads more like a land use plan. It would be useful to show this relationship on plan, in terms of density, building height and character areas; both sides of the site red line.

This site provides Suffolk County Council with a great opportunity to create a model development to showcase how sites should be developed. Therefore we find it disappointing that the vision statement only aspires to deliver 'development [that] will be of standard that it will be used as a good practice' rather than seek to achieve 'best practice'. This is clearly a missed opportunity that fails to deliver the high quality environment that all stakeholders of this project have committed to. We would urge the local authority to seek further specialist integrated urban and landscape design input into achieving a scheme which has the ability to create a well-balanced and integrated community.

Heritage

St Bartholomew Priory

In our representation in response to the proposed masterplan the SPS raised concerns that the proposed 60 bed hotel on the north side of the A134 and the suggested vehicular access into the industrial zone which could have significant implications for the setting of Bartholomew Chapel, a Scheduled Ancient Monument and Priory Farm, a grade II listed building. As Historic England have made clear in their letter dated 10 February, the monastic precinct and the surrounding landscape forms part of the wider setting of these assets. Furthermore, the precinct extends north beyond the A134 and the Society supports the advice from Historic England that every effort should be made to recognise the importance of this wider setting and further harm must be avoided. We also note from the Landscape and Visual chapter 10 of the Environment states at para. 10.9.7 that the historically important hedgerow is to be lost within the employment zone. This is unwelcome and the Society would wish to see amendments to retain this hedgerow which is an important landscape feature and forms part of the St Bartholomew Priory precinct.

We note that the indicative building heights plan indicates that a building up to 14m in height (five storeys) would be permitted. The implications for the setting of the designated assets are considerable and we urge that the scheme is amended to considerably reduce storey heights in this sensitive location. The topography of the site would aggravate the prominence of developing a large scale building and we would recommend the urgent review of the location and scale of this element of the scheme. The Society reiterates its view that the scale and distribution of buildings associated with the employment zone should be amended to provide a much smaller scale and a greater emphasis on workshops and work from home type studios of a scale no greater than 3 storeys or 8m to ridge.

Chilton Hall

The community woodland to the north east of Chilton Hall and enhanced landscape planting will serve to better protect the setting of this grade II* listed building and Registered Park and Garden. However, the permitted heights across the employment zone on the east of the site (north of Chilton Hall) is a cause of concern as it will introduce built form of a height and scale that is unprecedented in the immediate area. The setting of the principal entrance to the Hall and Registered Park and Garden Hall should be safeguarded from further visual intrusion of an industrial scale and accordingly we recommend that the maximum height is reduced from 14m to a more modest height not exceeding that of the adjoining smaller scale structures of which it will form a part. While we acknowledge the existing planting that is to the south of the industrial site, we would encourage additional planting to adequately address the anticipated harmful impacts, especially in winter months when screen effects are minimal.

As with all the proposed landscape mitigation this should be designed to respond to the impacts from the development as identified in the LVIA work.

Long Wall

A grade II single storey post war building which sits immediately to the north of the proposed employment zone at the west end of the site. Its setting is currently rural and makes an important contribution to its significance as an example of architecture that embodied "simplicity in a meadow" (Philip Dowson, architect, 1963). The visual impacts of the proposed industrial buildings may significantly impact upon these special qualities. We note that the Environmental Statement fails to either analyse the impact upon its setting or address views from and to the employment zone and the heritage asset. This is a serious omission and should be addressed in order to satisfactorily allow consideration of the impacts upon the significance of the building. It is unreasonable to suggest that the planting belt as shown will adequately mitigate the harmful visual effects upon the character of the buildings in view of the anticipated scale (five storeys) of the industrial buildings.

We trust that you will find these comments helpful in the assessment of this application.

Yours sincerely



Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director

Waldingfield Ward Councillors Cllr Frank Lawrenson, Cllr Margaret Maybury
Stephen Thorpe – Chairman Sudbury Society
Chairman, Sudbury Town Council
Chilton Parish Council
Ralph Carpenter, SPS Babergh District Committee
Colin Spence – Suffolk County Councillor

SUFFOLK

PRESERVATION SOCIETY

Respecting the past, shaping the future

Little Hall Market Place
Lavenham Suffolk CO10 9QZ
Telephone (01787) 247179
Fax (01787) 248341
email sps@suffolksociety.org
www.suffolksociety.org

20 June 2017

Mr Ben Elvin
Planning Officer
Babergh District Council
Council Offices
Corks Lane, Hadleigh
Ipswich IP7 6SJ

Dear Mr Elvin

Chilton Woods: Mixed Use Development, Land North of Woodhall Business Park, Sudbury, Suffolk Amended Scheme.

B/15/01718 Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

I am writing on behalf of the Suffolk Preservation Society further to the recently submitted amendments to the masterplan and illustrative layout. We are pleased to note that our concerns regarding the setting of Bartholomew's Priory have been more thoroughly addressed in the EIA. We also note the changes to the layout of the housing in order to mitigate impacts upon the Scheduled Monument, Moats Hall and the enhanced planting on the south east corner of the proposed hotel site. Nevertheless, the majority of our concerns regarding the scheme remain outstanding and we therefore refer you to our letter of 23 March 2016.

Yours sincerely


Fiona Cairns
BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director

*Waldingfield Ward Councillors Cllr Frank Lawrenson, Cllr Margaret Maybury
Stephen Thorpe – Chairman Sudbury Society
Chairman, Sudbury Town Council
Chilton Parish Council, Colin Spence – Suffolk County Councillor
Ralph Carpenter, SPS Babergh District Committee*

CHILTON WOODS PLANNING APPLICATION – B/15/1718

BABERGH DC COMMUNITY SERVICES - CONSULTATION RESPONSE

1. SYNOPSIS

The following provides commentary and comment on the open space and community facilities proposed as part of the planning application. Information provided has been drawn from Council Officers in the Public Realm and Communities teams, together with the Strategic Leisure Advisor.

2. CONTEXT

The Councils (Babergh & Mid Suffolk) are currently undertaking playing pitch, open space (including children's play provision) and community facility audits. Due for completion late summer/ autumn, these will ultimately inform and update the Councils' planning policies by adopting a new strategic approach to future provision which takes into account local "assessments of need" rather than the more traditional space standards approach only, as currently used. In the mean-time the space standards in existing policy can only be regarded as a baseline for provision and these should be further developed to take into account recent or indeed new consultation with key local stakeholders.

3. FUTURE OWNERSHIP MANAGEMENT

At this stage the Council is taking a flexible approach to determining who is best placed to take on the future ownership and management of the open spaces and community facilities as with long term projects, organisational circumstances can change over time ie. The Council has had ongoing discussions with local Parish/Town Councils, including currently. However, a number of Parish Meetings have yet to be held so the current interest in taking on such responsibilities is as yet unclear. It is likely to be the case that there would be a "piecemeal" approach to which aspects would be taken on ie. open spaces, sports provision, play areas, village hall etc. This important aspect, therefore is better placed being dealt with in reserved matters to ensure the most appropriate solution is achieved.

We suggest that local Parish/Town Councils/bespoke third party organisations could be responsible for the management of the village centre facilities and play areas. However, we would recommend that if they are also to be responsible for the management the sports pitch provision, that they engage at an early stage with any future potential clubs who may use the facilities as a potential managing partner and/or any local leisure operators ie. South Suffolk leisure, who already undertake this type of management and will provide local consistency of provision across the area.

The Council is also reviewing its own approach to the adoption of such spaces and facilities, as the scale and complexity of development needs to be taken into account on an individual and strategic level when considering adoption options. In particular, the provision of SUDS needs careful consideration due to the longer term accountability and financial commitments that result from its wide ranging design approach to provision. The Council may also in certain cases suggest that it could be an intermediary to receiving and ultimately transferring aspects to third

parties, as and when appropriate, to ensure a smooth transition and achieve long term sustainability.

4. PROVISION & COMMUTED SUMS FOR MAINTENANCE

The following, provides updated financial proposals and commentary for the specific open space and community facility provision costs and commuted sums (for future maintenance), as currently stated in the Draft Sect. 106 Heads of Terms.

As an overview, the provision costs are generally accepted (unless where stated), assuming they have been updated to the most recent industry or other specific benchmarks. The commuted sums for open spaces are based on a 10-year period which is deemed to generally reflect the norm for similar local authorities.

a) Community Woodland:

Provision: As provided and updated by AFW.

Committed Sum: £457,800. Based on applying a standard meadow management/deferred tree work rate of 14p x 32.7 hectares x 10,000 for a 10 yr period.

b) Allotments:

Provision: As provided and updated by AFW.

Committed Sum: Nil. We suggest no committed sum as they will be passed onto an appropriate allotment association following provision.

c) Playing fields

Provision: As provided and updated by AFW. (Assume Sp. England benchmark).

However, the spatial need for 6 grassed football pitches should remain but due to the Football Association's current strategy, it may be more appropriate to provide an artificial pitch (ideally 61x43m with floodlights@£400,000), with the remaining grass used for smaller sided grass football pitches or indeed more informal activity. There is no demand, therefore no requirement for a cricket provision. We therefore suggest that the provision value is retained but it may ultimately be used against a modified sports specification. The forthcoming Playing Pitch Strategy will inform this aspect.

Committed sum: £160,000. We suggest that by removing the cricket requirement and basing the maintenance of 1 AGP (£5k gr. m plus £5k floodlight energy = £10K/yr) plus 2 junior football pitches @ £3k/pitch = £16k x 10 years = £160,000.

Plus:

£501,540. Based on 8.77 hectares general grass maintenance (28.65/m²), 13.6 hectares litter scavenging (0.048p/m²) plus 2.5k footpaths/fencing and furniture repairs for a 10 yr period, noting that the facility should be deriving income from pitch hire use.

d) Sports pavilion and car parking

Provision: As provided and updated by AFW. (Assume Sp. England benchmark).

We assume this includes a car park (Range £1k-£2k/space). Based on 15 cars (mainly junior parents/cannot assume local players)/match x 3 x double up overlap = min. 90 spaces = potential addition of £90,000-£180,000.

Commuted Sum: £150,000. As a separate building (not linked to village hall) it may be reasonable for the managing organisation to not expect to achieve financial sustainability of this building due to its specific use. Therefore, based on historic figures assuming £15k/yr for cleaning, r&m and utilities over 10 years, noting that pitch hire charges (as above) should also derive income for changing/social use.

NB. It is not clear whether the building will be transferred to a third party on a full repairing lease option or a more traditional part repairing option when the landlord retains structural and major fixed asset costs? Clarity is required including the establishment of a sinking fund.

It must also be noted that the provision of changing rooms needs to be provided at the same time as the pitches to meet modern standards of provision and safeguarding.

e) Other strategic open space: Peter Garrett to comment.

Provision: As provided and updated by AFW. (Assume industry benchmark).

Commuted Sum: £481,500. Based on a 10 yr period.

NB. Earlier comment re. SUDs.

f) Play provision

Provision: £540,000 in total. (Currently based on 1 NEAP, 5 LEAPS, MUGA & 7 LAPS). As provided and updated by AFW. (Assume industry/AFW benchmark).

The play allocation appears appropriate (against historic standards) although the exact composition ie. specific siting, the value of 7 LAPS c/f expanded LEAPS etc requires further consideration as there may be improved play benefits to delivering a fewer, better and more widely age/activity ranged equipped areas. In particular the type and style of equipment provided ie. including adventure play, fitness equipment, teenage – wheeled sports etc, also needs to be carefully considered against the expected population profile of the new housing. The forthcoming Open Space Audit will inform this aspect.

The proposed MUGA is for informal activity ie. small scale basketball, kickabout etc rather than formal sport. Such facilities are usually located associated to play areas, but siting

needs to be carefully considered as these are "classic" youth gathering areas, and recognition of this needs to be taken into account. ie. Assuming currently near village centre & woodland although some could go to sports field? Lighting associated with the MUGA in village centre area is also an essential to encourage appropriate use.

Commuted Sum: £340,500. Based on historic BDC figure for a 10 yr period.

NB. General comments on Phasing for C, D and E - Sports and play provision appear to be late in the phasing, which usually results in "inactivity" by new residential-children and young people in particular and often results in "hanging around in streets", older children using younger children's play areas, anti-social behaviour. We would therefore urge that provision of the larger play sites/MUGA & any AGP's are provided as early as possible as they will become "honey pot" sites ie. people will go to them as soon as they are there, even if not directly local to their residence. (This will also support the overall aim of encouraging walking, cycling etc).

g) Village Centre

Provision: As provided and updated by AFW.

Commuted Sum: £50k. Any new organisation would be expected to achieve a financially sustainable facility within 3-5 yrs maximum, so a one off equipping contribution with say a max. of 3 years revenue support would be more appropriate. Therefore, ie. £25,000 one off plus revenue support yr1 = £10k, Yr 2 & 3 = £7.5k/yr = £25,000.

NB. It is not clear whether the building will be transferred to a third party on a full repairing lease option or a more traditional part repairing option when the landlord retains structural and major fixed asset costs? Clarity is required including the establishment of a sinking fund.

TB 21/6/17

From:David Pizzey
Sent:Wed, 2 Mar 2016 08:40:44 +0000
To:Ben Elvin
Cc:Planning Emails
Subject:B/15/01718/OUT Chilton Woods.

Ben

The preliminary tree survey report submitted with this application provides a generally accurate assessment of the condition and constraints presented by trees at the site. These trees are an important component of the local landscape character and should be retained wherever possible as part of the design process. As the application progresses we will also require a Tree Protection Plan and Arboricultural Method Statement, informed by the finalised layout design, before we can make an accurate assessment of the impact of the proposal on existing trees. Details will also need to be provided regarding appropriate protection measures and any special engineering or construction required within Root Protection Areas.

Please let me know as and when you require any further comments.

David

David Pizzey
Arboricultural Officer

Hadleigh office: 01473 826662

Needham Market office: 01449 724555

david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk

Babergh and Mid Suffolk District Councils - Working Together

From: planning.control@babergh.gov.uk [mailto:planning.control@babergh.gov.uk]
Sent: 12 February 2016 15:20
To: David Pizzey
Subject: To: Arboricultural Officer - David Pizzey Planning application Consultation Request

MEMO

FROM: Economic Development Manager, Babergh & Mid Suffolk District Councils

TO: Ben Elvin (Sen. Development Management Officer)

SUBJECT: **B/15/01718/OUT/BEL: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury**

Proposal: Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Thank you for consulting the Economic Development Team on this application.

The Economic Development Team supports the proposals' aspiration to meet the policy requirements set out in the Core Strategy in terms of a mixed use development incorporating employment-generating uses B1, B2 and B8, and a hotel, as well as community shops A1, A2, A3, A4 and A5 and workspace.

In quantitative terms the Employment Land Study 2016 identifies a lower need for employment land across the District than the previous plan identified. However, Sudbury is the main town where significant levels of growth would be expected. There is a higher concentration of employment in the town compared with the rural areas, and as such Sudbury should naturally offer more employment land than its pro-rata share would imply. Therefore the ED Team considers that the quantum proposed is appropriate. There is no justification for reducing the employment land quantum simply as a result of the Study findings.

The quantitative aspect must be balanced with qualitative needs and aspirations. Although other pockets of land exist in industrial areas, each of these carries an identity that is suitable for some operators but not others (eg haulage firms like location with other haulage firms, but office operators choose to be with other office users, and they rarely co-exist) so a range of types of land are required, rather than simply a *quantity* of land. A wholly-new site such as this offers an opportunity to create a new identity and promote a high quality aspirational destination. Such exemplar sites generate and maintain their own success and "kudos" that ensures delivery.

All employment-generating development is welcome, however a mix of uses would be welcomed where there is a higher density of employees per sqm than simply B8 storage and distribution warehousing could deliver. Accordingly the ED Team would be supportive of proposals for uses such as trade warehousing, hotel, car showrooms etc as well as more traditional forms of industrial/office/commercial development.

The proposed phasing of the delivery of the site is welcome in order to stimulate interest and at the same time be responsive to the market, allowing it to grow in step with residential occupiers. Any opportunity to accelerate the availability of serviced land and early delivery should be explored.

The frontage to the main A134 is a key asset as modern operators like to be visible to passing trade. Therefore consideration should be given to signage and presenting a welcoming entrance to instil an impression of quality about the site.

Elsewhere in the proposal, the shop units in the proposed village centre should be designed to meet the needs of modern retailers, with separate service yards. The use of upper floors should be carefully considered, with other commercial uses being preferable to residential use to minimise potential amenity conflicts with potential operators, such as hot food takeaways.

In conclusion, the ED Team welcomes the proposed development in order to provide balanced growth options across Sudbury and the wider area to provide jobs alongside residential development.

David Benham.
Corporate manager Economic Development and Tourism.

From: Andrew McMillan
Sent: 19 June 2017 10:41
To: BMSDC Planning Area Team Green; Steven Stroud
Subject: B/15/1718 : Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

MEMO

FROM: Open For Business Team: Economic Development, Babergh & Mid Suffolk District Councils

TO: Steven Stroud (planninggreen@baberghmidsuffolk.gov.uk)

SUBJECT: **B/15/1718 : Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury**

Proposal: Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works. | Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury

Thank you for consulting the Open For Business Team - Economic Development on this application.

It is unfortunate that the quantum of employment land has reduced by 1.4 hectares due to the heritage issues at the site of the former Wood Hall where the Moat remains. However, the proposed quantum remains in accordance with the Core Strategy Policy CS4. It is critical that the employment land is released early in the development phasing and the OFB Team would restate its intention that it will assist in bringing the land forward.

The OFB Team considers that it is necessary that the interface between the employment uses and the residential uses is such that the business amenity is not impacted due to proximity.

In conclusion, the ED Team welcomes the proposed development in order to provide balanced growth options across Sudbury and the wider area to provide jobs alongside residential development.

Andrew McMillan
Open For Business – Economic Development.

With best regards

Andrew McMillan

Economic Development Officer – Open For Business

Babergh and Mid Suffolk District Councils - Working Together

Needham Market: 01449 72 4931

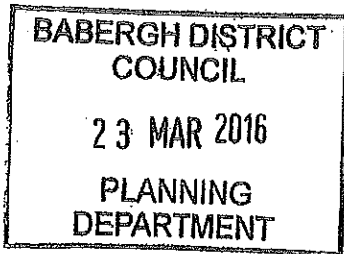
Email: Andrew.McMillan@baberghmidsuffolk.gov.uk

Websites: www.babergh.gov.uk www.midsuffolk.gov.uk

131 High Street, Needham Market, Suffolk, IP6 8DL

Corks Lane, Hadleigh, Suffolk, IP7 6SJ

NOTE: The Council is now using an additional security element to our e-mail system, called Egress Switch. This enables us to encrypt sensitive emails for security purposes. If you receive an email marked in the subject heading with either [Official] or [Officially Sensitive] you will need to use EGRESS switch to read your email. To read the encrypted email on the Egress Switch you will first need to register before you can read the email. Please follow the instructions within the email to gain access. Our customer's data is important and we are doing everything we can to ensure a high level of security when handling sensitive information.



CHILTON WOODS

Planning Application B/15/01718 Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park - Outline application (with all matters reserved except for access)

Response from Woods Around Town Environmental Group:

History of Woods Around Town

Woods Around Town (WAT), formally known as Woodland BATS (Biodiversity Around Towns Scheme), is a local environmental group for Sudbury and the surrounding villages dedicated to the creation of new woodland and wildlife habitats and to the maintenance of existing ones.

Formed in 2006 a small number of volunteers have undertaken many community projects, which has included working with both Sudbury Town Council, Chilton Parish Council, Babergh District Council, Suffolk County Council (SCC) and local residents.

SCC has very kindly leased us a small piece of land at The Grove, Chilton for the use as a tree nursery by the group, where we have grown trees on for various projects but also for establishing some trees for when the group start to plant their woodland.

The main aspiration of the group has always been the creation of a woodland in Sudbury for all to enjoy.

WAT is now often consulted by local councils, groups and individuals on environmental projects including the Sudbury area's first 'Biodiversity Trail', now known as the Gainsborough Trail, the first part of which has been completed.

WAT works closely with and includes young people in its projects and has given talks and aided projects at local schools.

The group regularly publish Newsletters to its members, runs social events and proactively recruits new members by taking part in exhibition opportunities, particularly those with an environmental or local activity themes.

The Group have the following comments to make in respect of the Chilton Woods Masterplan Outline Application.

- The group has real concerns in respect of possible flooding issues. We appreciate that SUDs will be part of the Plan but it is felt that the drainage measures will be insufficient to cope with the large amount of runoff from this site, which is high above Sudbury and which will direct all its runoff downwards into the town. The system is antiquated and has outgrown its current usage. This will result in flooding in East Street. This is an area where floods are a frequent occurrence.
- The Group are pleased with the reduction in the numbers of dwelling as this will be more in keeping with the site and will allow for more open space.
- Household waste and district heating centre are welcome developments.

- Would welcome the re-siting of the lorry park in Sudbury to a location within the Chilton Woods development. Possibly resulting in a reduction in the number of lorries going in and out of the town centre and allowing for additional parking in the centre of Sudbury at the former lorry park near Waitrose.
- The proposed new access road off Springlands Way, west of Tesco, going through the industrial area of Chilton Woods is essential from the start to ensure that all building traffic is kept away from existing roads and residential areas and minimises disruption to local residents over a construction period of 10 years or more.
- In the long term it is hoped that commercial lorries using this spine road will be cut off from the housing area and access will be allowed for cars, pedestrians and bicycles only.
- If construction traffic is mostly coming from the Bury St. Edmunds direction, then the western access road to the site is essential. Construction traffic coming from Ipswich, Colchester or Braintree will cause severe congestion and safety problems for Great Waldingfield, Chilton Industrial Estate and Sudbury town centre.
- The Dormouse hedge next to a new housing estate is almost certain to see the destruction of the wildlife. It is suggested that early planting of new, dormice-friendly hedging be undertaken, which needs to be substantial for dormice to survive, in a quieter area, very early in the project's development.
- It is hoped that parking for the sports area is provided. However, heavily supported events at the sports ground, e.g. football matches, will cause severe congestion on departure in Acton Lane. The sports ground would be better located near the hub facilities to give these life and viability.
- The group has real concerns regarding site access and exit through Aubrey Drive will result in loss of amenity and reduce quality of life and wellbeing for local residents. Would suggest that alteration be made to the Homebase/Aubrey Drive roundabout, including re-modelling to slow down traffic coming from the MacDonald's roundabout.
- Allotments, cycle paths and footpaths throughout the site are welcome, though access to the allotments needs to be more clearly defined.
- Please to see that 54% of the Masterplan is allocated to green space. However, plans for the woodland need to be expanded. Nature trails, fitness trails, defined tree species areas to make the woodland more interesting, not just mixed, need to be explained and discussed. Also the planting and maintenance of the woodland needs to be planned at an early stage. The removal of the eastern part of the woodland has barely left more than a walking corridor for the Gainsborough Trail, apparently broken in places. This is disappointing and takes away from the attractiveness of the scheme.

- Suggest to alleviate the above concern it would seem sensible to create a new footpath along the north-eastern edge of the county wildlife site and a new pathway through the existing woodland on the airfield that abuts Waldingfield Road, linking up with the proposed footpath running just east of The Grove. This would create a new circular walk as an alternative to the woodland area with the County Wildlife area at its heart.
- The “village green” should be located next to the community centre, not put on the other side of a busy road.
- The group is hoping that a subsidised bus service to serve the estate, as mentioned in the original plan, for a period of several years would be put in place.
- We still believe that increased levels of car and delivery traffic as a result of the development will congest approaches to the town centre via East Street even more and make pollution in Cross Street even worse.

Midlands and East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Email address: kerryharding@nhs.net
Telephone Number – 0113 824 9111

Our Ref: NHSE/B/15/01718/KH

Your Ref: B/15/01718/OUT

Planning Services
Babergh District Council
Council Offices
Corks Lane
Hadleigh
Ipswich, IP7 6SJ

03 March 2016

Dear Sir

**Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3) etc;
Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury**

1.0 Introduction

- 1.1 Thank you for consulting NHS England on the above planning application.
- 1.2 I refer to your consultation letter on the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the Primary Healthcare provision on behalf of NHS England –Midlands & East (NHSE), incorporating the West Suffolk Clinical Commissioning Group (CCG) & NHS Property Services (NHSPS).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development is likely to have an impact on the services of 2 main GP practices and 4 branch surgeries operating within the vicinity of the application site.
- 2.2 These practices do not have capacity for the additional growth resulting from this development.
- 2.3 The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals.
- 2.4 New development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through a Section 106 planning obligation.

3.0 Assessment of Development Impact on Existing Healthcare Provision

- 3.1 The development could generate approximately 2,530 residents and subsequently increase demand upon existing constrained services.
- 3.2 The development would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

4.0 Healthcare Needs Arising From the Proposed Development

- 4.1 The development would give rise to a need for improvements to capacity by way of extension, refurbishment, reconfiguration and/or relocation at the existing practices, a proportion of which would need to be met by the developer. In this instance, the funds would likely be used towards estates rationalisation capturing the relocation of Hardwicke House Group of practices, which currently consists of a main and 4 branch surgeries.
- 4.2 Table 1 provides the Capital Cost Calculation of additional health services arising from the development proposal.

Table 1: Capital Cost calculation of additional health services arising from the development proposal

Premises	Additional Population Growth (1,100 dwellings) ⁵	Additional floorspace required to meet growth (m ²) [□]	Capital required to create additional floor space (£) [□]
Hardwicke House Group Practice (including 1 main & 4 branch surgeries)	2,530	173.49	346,980
Total	2,530	173.49	346,980

Notes:

1. Calculated using the Babergh District Average household size of 2.3 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number).
 2. Based on 120m² per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
 3. Based on standard m² cost multiplier for primary healthcare in the East Anglia Region from the BCIS Q1 2014 price Index, adjusted for professional fees, fit out and contingencies budget (£2,000/m²), rounded to nearest £.
- 4.3 A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required, in this instance to be **£346,980**.
- 4.4 NHS England therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 Agreement.

5.0 Conclusions

- 5.1 In its capacity as primary care healthcare commissioners, NHS England have identified that the development will give rise to a need for additional healthcare provision to mitigate impacts arising from the development.
- 5.2 The capital required through developer contribution would form a proportion of the required funding for the provision of increased capacity within the existing healthcare premises servicing the residents of this development.
- 5.3 Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 5.4 The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development.
- 5.5 NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.
- 5.6 NHS England look forward to working with the application and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully

A blacked-out signature area with a handwritten flourish below it.

Kerry Harding
Estates Advisor

Midlands and East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Email address: kerryharding@nhs.net
Telephone Number – 0113 824 9111

Our Ref: NHSE/B/15/01718/KH

Your Ref: B/15/01718/OUT

Planning Services
Babergh District Council
Council Offices
Corks Lane
Hadleigh
Ipswich, IP7 6SJ

7 August 2017

Dear Sir

**Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3) etc;
Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury**

1.0 Introduction

- 1.1 Thank you for consulting NHS England on the above planning application and the recent change in proposed dwelling numbers from 1,100 to 1,150. In light of this change I have amended our previous response below to reflect the current situation.
- 1.2 I refer to your consultation letter on the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the Primary Healthcare provision on behalf of NHS England –Midlands & East (NHSE), incorporating the West Suffolk Clinical Commissioning Group (CCG) & NHS Property Services (NHSPS).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development is likely to have an impact on the services of 2 main GP practices and 4 branch surgeries operating within the vicinity of the application site.
- 2.2 These practices do not have capacity for the additional growth resulting from this development.
- 2.3 The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals.
- 2.4 New development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be

fully assessed and mitigated by way of a developer contribution secured through a Section 106 planning obligation.

3.0 Assessment of Development Impact on Existing Healthcare Provision

- 3.1 The development could generate approximately 2,645 residents and subsequently increase demand upon existing constrained services.
- 3.2 The development would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

4.0 Healthcare Needs Arising From the Proposed Development

- 4.1 The development would give rise to a need for improvements to capacity by way of extension, refurbishment, reconfiguration and/or relocation at the existing practices, a proportion of which would need to be met by the developer. In this instance, the funds would likely be used towards estates rationalisation capturing the relocation of the Hardwicke House Group of practices, which currently consists of a main and 4 branch surgeries, enabling increased capacity and a wider range of primary care services.
- 4.2 Table 1 provides the Capital Cost Calculation of additional health services arising from the development proposal.

Table 1: Capital Cost calculation of additional health services arising from the development proposal

Premises	Additional Population Growth (1,150 dwellings) 1	Additional floorspace required to meet growth (m ²) 2	Capital required to create additional floor space (£) 3
Hardwicke House Group Practice (including 1 main & 4 branch surgeries)	2,645	181.37	417,151
Total	2,645	181.37	417,151

Notes:

1. Calculated using the Babergh District Average household size of 2.3 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number).
 2. Based on 120m² per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
 3. Based on standard m² cost multiplier for primary healthcare in the East Anglia Region from the BCIS Public Sector Q3 2015 price & cost Index, adjusted for professional fees, fit out and contingencies budget (£2,300/m²), rounded to nearest £100.
- 4.3 A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required, in this instance to be **£417,151**.
- 4.4 NHS England therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 Agreement.

5.0 Conclusions

- 5.1 In its capacity as primary care healthcare commissioners, NHS England have identified that the development will give rise to a need for additional healthcare provision to mitigate impacts arising from the development.
- 5.2 The capital required through developer contribution would form a proportion of the required funding for the provision of increased capacity within the existing healthcare premises servicing the residents of this development.
- 5.3 Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 5.4 The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development.
- 5.5 NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.
- 5.6 NHS England look forward to working with the application and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully



Kerry Harding
Estates Advisor

BABERGH DISTRICT COUNCIL

MEMORANDUM

TO: Ben Elvin, Development Control Team

FROM: Joanna Hart, Environmental Protection Team

DATE: 04.04.2016

YOUR REF: B/15/01718/OUT/BEL

SUBJECT: Land North of, Woodhall Business Park, SUDBURY, Suffolk.

Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Please find below my comments regarding 'Environmental Health - Other issues' only.

Thank you for your consultation on the above application.

The application is accompanied by an Environment Statement (dated December 2015, document reference L35223R049), chapter 8 of which considers noise and vibration.

Section 8.7.41 of the chapter identifies that government noise policy invites thresholds to be set to identify the three levels of noise effect – Lowest Observed Adverse Effect levels (LOAEL), Significant Observed Adverse Effect levels (SOAEL) and Unacceptable Adverse Effect Levels (UAEL). The ES does set these thresholds for road traffic noise and construction noise, but for other noise impacts it sets a 'noise magnitude criteria' which is not based on these levels. This is rather confusing.

A baseline noise survey was carried out at 4 locations on the edges of the proposed site in April 2015 in order to ascertain existing day and (limited) night time noise levels. Unfortunately measurement point LT1 is not marked on the accompanying sound monitoring location plan (figure 8.1) and I would request a revised version of this plan to identify this location.

At the longer term (24 hour) measurement points LT1 and LT2, representative of the northern and southern site boundary, overall average noise levels are below both the BS8233:2014 (Guidance on sound insulation and noise reduction for buildings) and World Health Organisation (WHO) values to avoid 'moderate annoyance', and thus suggest that current noise climate would be suitable for residential use. Short term (1 hour) measurement points ST1 and ST2 are located adjacent to existing commercial uses (Tesco to the West and Chilton Grain to the East) and these indicate that average noise levels are on or below the BS8223/WHO guideline values, although impulsive noises (as might be expected from HGV movements, impact noise from hammering etc. and which have the potential to annoy) were noticeably greater at these locations, which identifies potential for loss of residential amenity.

In terms of noise impacts, Section 8.6.5 of the ES identifies that existing dwellings along Springlands Way, Waldingfield Road and Acton Lane but mainly Aubrey Drive are at most risk of being affected by noise resulting from an increase in traffic movements associated with the proposed development. Section 8.6.6 identifies that future residents in those areas located close to the proposed commercial/employment uses, and those located close to existing commercial/employment uses in the vicinity of the proposed development may also experience loss of amenity due to noise from these uses.

For clarity I have addressed each issue in turn below:

Construction noise

Section 8.7.1 states that it is not possible to make a an assessment of construction noise at this stage as the detailed construction programme is not yet known - however a provisional construction noise limit of 65dB_{LAeq,12hr} to be taken at the nearest noise sensitive receptor has been proposed based on BS:5228 (Code of practice for noise and vibration control on construction and open sites). I therefore suggest that condition be attached to the following effect-

- *No development shall commence until a Construction and Environmental Management Plan (CEMP), to cover both demolition/site clearance and construction phases of the development, has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall be undertaken in accordance with best practice guidelines (including measures as set out in table 8.6 of the Environmental Statement reference L35223R049) and BS: 5228:2009 + A1:2014 (and any revisions thereof). The plan shall include details of operating hours, scheduled timing/phasing of development for the overall construction period, means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors), loading and unloading of plant and materials, location and management of wheel washing facilities, external lighting, location and nature of compounds and storage areas (including maximum storage heights), waste removal, location and nature of temporary buildings and boundary treatments, dust management, noise management (both in terms of workers and local residents, and to include noise limit at the nearest sensitive residential property, or agreed representative accessible monitoring point) and waste/litter management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.*

Note: the Construction Management Plan shall be submitted in phases for each phase of construction so as to take account of protection measures for both newly constructed (and occupier) dwellings as well as those dwellings which existed prior to commencement/

- *No burning shall take place on site during the site clearance/demolition or construction phases of the development.*
- *No site machinery or plant shall be operated, no noise intrusive process shall be carried out and no demolition or construction related deliveries received or dispatched from the site except between the hours of 08.00 – 18.00 Monday to Friday, 09.00 – 13.00 Saturday and at no time on Sundays, Bank or Public Holidays.*

Reason: To protect the amenity of the locality, especially for people living and/or working nearby

Section 8.7.3 states that it is not yet possible to carry out an assessment for noise from construction traffic as details are not yet known. Section 8.85 identifies that construction traffic would need to be initially routed via Acton Lane and/or Aubrey Drive until such time as a temporary haul road can be constructed from the A134. I would strongly suggest that a condition be attached to any permission to the effect that;

- *Prior to any commencement, a noise assessment based on construction traffic, and details of any proposed mitigation or reduce effects on residents of affected properties, particularly those on Aubrey Drive (including Reynolds Way) and Acton Lane, should be submitted in writing and approved by the LPA.*

Road traffic noise

Section 8.9.3 identifies that the largest increase in road traffic noise due to the proposed development will be for approximately 25 existing residential dwellings in Aubrey Drive and Reynolds Way, which will be newly exposed to levels exceeding 50dB (the WHO guideline value for 'moderate annoyance' and lower BS 8223 guideline value for external amenity areas). Section 8.9.5 identifies that 12 of these dwellings will experience an increase of at least 5dB, identified as a 'high magnitude' by the EIA, of which 3 of the dwellings will experience levels exceeding 55db LAeq,16hr which is above the upper BS8223 guideline value for external areas and above the WHO guideline value to avoid 'serious annoyance'. The exact likely noise level is not given (although the section does state it is below 68dB La10) and I would suggest that further detail on this point is essential in order to determine internal levels at those dwellings, which may exceed BS8223 values.

BS8233 states that guideline values should only be exceeded if "a *compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted*". Therefore development would thus only be appropriate if you consider there are significant wider social and economic benefits of the development which would warrant the loss of amenity at these existing properties.

Section 8.9.8 states that *'in terms of government policy, the development does not introduce any new residential dwellings above SOAEL'*, and that *'as such, the road traffic noise from the development does not result in any significant adverse effects on health or quality of life'*. I disagree with this statement as the previous paragraph, section 8.9.7 identifies that for approximately 3 existing dwellings near to Aubrey Drive the increase in road traffic noise is likely to be 'significant'. I would strongly suggest that further assessment needs to take place to ascertain whether adequate mitigation for these properties is possible, as discussed in section 8.13 of the ES.

Noise from proposed employment areas

Section 8.7.27 identifies that it is not yet possible to provide a noise assessment for the potential effects of the noise from employment areas on proposed dwellings as neither the occupants nor exact configuration of units in these areas has not yet been determined. However, the ES identifies that a BS4142:2014 assessment would be appropriate and has suggested a noise criterion, (given in table 8.19 as rating level 42dBAr for the western employment area, and 29dBAr for the eastern 24hr operation – time period to be agreed, to be measured at the nearest noise sensitive receptor) to which a BS4142:2014 assessment would need to be carried out. However, LT2 is not a location representative of the closets proposed residential dwellings and LT1, as mentioned above, is not marked on the Sound Monitoring Location Plan. I would therefore strongly suggest that these monitoring locations be revised and figures recalculated to reflect this. BS:4142:2014 is the accepted standard used to rate and assess the impact of sound of an industrial/commercial nature. I would therefore suggest that a condition to the following effect be attached to any permission:

- *Once the detailed layout has been determined than a further noise assessment, based on BS4142:2014 shall be made. A noise assessment based on BS4142:2014 and using the cumulative noise rating level (to be agreed with the LPA) shall be carried out for each unit in the proposed employment land. All measurements shall be made in accordance with the methodology of BS4142 (2014) (Methods for rating and assessing*

industrial and commercial sound) and/or its subsequent amendments. Where access to the nearest noise sensitive property is not possible, measurements shall be undertaken at an agreed accessible and appropriate location representative of the nearest sound sensitive property or corrected to establish the noise levels at the nearest sound sensitive property.

In terms of the proposed western employment area, section 8.10.7 states that 'B2 general industrial use' development is proposed in the area nearest to the dwellings in order to "minimise potential noise effects. These buildings will provide screening against noise produced in the remainder of the employment area". I have concerns about this rationale – firstly, B2 uses can be associated with loss of amenity due to noise, particularly if operating on a 24 hour basis. I would strongly recommend that B1 uses, which should be compatible with residential, be sited closer to dwellings, rather than B2 uses. Secondly, although I agree that screening by means of building is a good idea, this will only be effective if these screening buildings are built before the remainder the employment area. If this cannot be controlled by means of phasing, then a further assessment will be needed in order to inform temporary mitigation such as screening by means of a barrier, to protect the proposed dwellings. I would suggest that a further condition to the following effect be attached to any permission:

- *Before use of the development commences, a noise mitigation scheme for the employment area shall be submitted in writing and approved in writing by the local planning authority detailing measures that will be implemented to ensure that any noise associated with the employment land forming part of the development does not cause detriment to amenity or a nuisance, especially to those living and working in the vicinity. This scheme should take into account hours of operation, nature of operations, associated vehicle movements etc.*

The proposed Household Waste and Recycling Centre (HWRC) is positioned so as to provide approximately 250m of separation distance between it and the proposed new dwellings. This facility can be associated with noise, particularly "impulsive" noise from vehicle movements and crashes, bangs etc. from machinery and therefore I would view its final location as being critical to its viability. Again, it is stated in section 8.10.9 that 'some degree of noise screening will be provided by proposed employment buildings which will be located in between the waste area and the proposed dwellings'. I would suggest that a noise assessment based on BS:4142:2014 should be required for this operation in order to identify whether any additional mitigation in the form of screening of similar is needed, particularly if the HWRC is operational before the rest of the employment area has been built, as the screening mentioned in section 8.10.9 will not be afforded.

Section 8.11.20 considers glazing packages for the western area employment site. However, this has reference to predicted noise levels from existing roads, and does not take into account the effect of the proposed spine road through the employment site, which may be heavily used by HGVs etc. Sections 8.11.17 & 18 identify potential glazing packages which could meet the requirements of BS8223, but until an assessment is made which includes the predicted noise from the internal roads on the development I am unable to comment further. I would therefore request that once the detailed layout of the site is known then this matter is re-assessed and agreed with the LPA prior to approval.

Finally, I would recommend that a condition be applied to the effect that any new employment/commercial units including a commercial kitchen shall be required to submit details of kitchen extract ventilation and odour abatement plant to the LPA for approval prior to construction. Such details shall include acoustic details and a noise assessment based on BS4142:2014 to demonstrate that the system is suitably isolated and attenuated so as not to result in loss of amenity due to noise or odour. The applicant's attention should be drawn to the DEFRA document 'Guidance on the control of odour and noise from commercial kitchen exhaust systems'.

Noise from existing employment uses

The proposed residential development is in proximity to existing employment areas, specifically the Woodhall Business Park to the west and Chilton Grain to the east. Noise levels measured at these sites, according to table 8.4, appear to exceed the proposed noise criterion (selected as being a threshold to prevent loss of amenity) for the new employment areas, and I am therefore concerned about impact of these existing sites on residential amenity at the proposed dwellings.

I am concerned about the potential impact of Chilton Grain on the nearest proposed residential area, to the east of the site. This is because the Environmental Protection team does have a history of noise complaints about grain drying noise from this facility, usually during the autumn and winter months, particularly at night. I am concerned that the ES noise assessment, having taken place in June, may not have taken account of this noise and as such I am concerned about the suitability of the siting of the eastern residential area. I would strongly recommend that clarification is sought in respect of section 8.11.27, which gives a measured sound level at the grain store, as to whether the grain store was in full operation at the time. I would also suggest that operating hours are clarified and that further measurements are taken during full operation at night. I would strongly recommend that a noise assessment, based on BS4142:2014 is required to inform the suitability of the eastern residential area and to identify any potential mitigation needed to ensure that BS8233/WHO guideline values are met at the new properties (as well as the proposed commercial property) in order to protect the operation of Chilton Grain from being fettered following any noise complaints from these new dwellings.

In terms of existing units at Drury Drive, which are in close proximity to some of the proposed residential dwellings, an average sound level of $48\text{dB}L_{Aeq,12\text{hrs}}$ was determined, however no information is given about L_{Amax} (short-lived, impulsive) levels which I suspect could be quite high as table 8.5 notes that 'music playing, vehicles manoeuvring in car park and extraction plant noise' were observed during the noise survey. Section 8.11.26 states that 'the required glazing specification for road traffic noise will provide adequate protection against potential sound effect from the existing commercial units'. I would suggest this may be the case if windows are kept shut – I would suggest that this is indicative that this area may not be suitable for residential development, due to the character of noise from these existing units. In addition it is stated in the same section that '*night-time observations determined that the units were not operational during the night*' – although I appreciate this may be the case at present, I am concerned that these units may have unrestricted permissions and therefore any change of owner or operating practice could result in noise issues at nearby properties which may fetter the ability of these units to operate without resulting in noise complaints. Therefore I would recommend that a further survey is carried out, based on BS4142:2014, which should include L_{Amax} readings, identification of affected properties and glazing/ventilation specification to ensure WHO/BS8233 values can be met at the proposed new dwellings.

Residential development

Section 8.11.1 identifies that, at present, the majority of the site experiences noise levels below $50\text{dB}L_{Aeq}$, with no external residential amenity areas of the site predicted to experience external noise levels of in excess of the WHO and BS8223 upper guideline values of $55\text{dB}L_{Aeq}$, therefore the site is suitable for residential development in principle.

However, section 8.11.5 identifies that some areas of the residential site are predicted to be subject to noise levels between $50 - 62\text{dB}L_{Aeq,16\text{hr}}$ due to traffic noise. As these details are shown on a noise contour plot (figure 8.4), it is not possible to give the exact number or location of dwellings at present.

Section 8.11.5 identifies that Standard thermal double glazing (4/12/4 mm glass/air gap/glass) would be sufficient for those properties with external noise levels of $\geq 50\text{dB}L_{Aeq,16\text{hr}}$ as, accounting for a 15dB reduction in noise level if windows were partially open, this would meet the

35dB internal noise criteria identified by BS:8223. However, residential dwellings in areas with a daytime external noise level exceeding $50\text{dB}_{\text{LAeq},16\text{hr}}$ would require alternative ventilation (as an alternative to opening windows) as windows will be required to be shut in order to meet internal criteria. Section 8.11.7 identifies that bedrooms in areas with external night time noise levels $\geq 56\text{dB}_{\text{LAeq},8\text{hr}}$ will require an upgraded glazing specification as well as alternative ventilation in order to meet BS8223 indoor values. It is unclear from figure 8.7 whether any of the proposed dwellings will be located in such areas. I would suggest that, if it is felt it would be acceptable to require windows to be kept shut in these properties, it should only be acceptable if it would be possible to meet the ventilation requirements for these dwellings through passive ventilation.

As suggested in 8.11.3 I would strongly recommend that a condition be attached to any permission to the effect that:

- *Prior to commencement of each phase of any residential development, a further noise assessment shall be submitted to and approved by the LPA in order to inform the detailed design for residential dwellings – this should include specifications for orientation and layout of external areas, to include detailed noise-break in calculations to identify glazing/ventilation packages so as to ensure that BS8223:2014 and WHO guideline values are met. This should include assessment of the likely noise impact of the proposed internal roads to the development, especially those which 'connect' with Aubrey Drive as these may be at higher noise levels.*

A further condition will be required in order to ensure the measures arising from the above condition are implemented – I would suggest that this includes provision for a sample of residential properties (the number and locations of which to be agreed between the developer and the LPA) to be independently tested and certified so as to demonstrate that the scheme of glazing given in sections has been effectively installed and that internal design values are met.

Hotel

Figure 8.4 shows that the area where the proposed hotel is to be located is subject to daytime noise levels of between $62\text{-}73\text{dB}_{\text{LAeq},16\text{hr}}$. Therefore, the hotel would require an upgraded glazing specification above that of standard double glazing in order to achieve BS:8233 levels. These levels could only be achieved with windows closed so it would be essential that alternative ventilation was provided. It is unclear as to whether this would be passive or mechanical ventilation. I would strongly suggest that a condition be attached to any permission requiring that prior to commencement, a further noise assessment for the hotel be submitted for approval by the LPA at the detailed design stage.

School

Section 8.11.11 identifies that external levels at the proposed school are not likely to exceed $45\text{dB}_{\text{LAeq},30\text{min}}$ and thus is likely to fully meet the acoustic requirements of BB93:2015. I would suggest that a condition be attached to any approval to the effect that;

- *at the detailed design stage, a noise assessment should be required to be submitted and approved by the LPA to demonstrate compliance with the internal and external noise levels as given in BB93:2015 (or any subsequent revision). The assessment shall also include precise details of all extract ventilation, air handling or other noisy plant, along with a scheme of attenuation and a Noise Assessment based on BS4142:2014, shall be submitted to the LPA prior to construction.*

I would also recommend that a condition be attached requiring that;

- *Precise details of kitchen extract ventilation and odour abatement shall be submitted to the LPA for approval prior to construction. The applicant's attention should be drawn to the*

DEFRA document 'Guidance on the control of odour and noise from commercial kitchen exhaust systems'.

Lighting

At this stage it is unclear what the arrangements will be for lighting throughout the development. Lighting has the potential to result in loss of amenity and I would therefore recommend that a condition be attached to any permission to the effect that :

- *Before the development commences a written scheme shall be submitted to and agreed in writing by the local planning authority that specifies the provisions to be made for the level of illumination of the site and to control light pollution. The scheme shall be implemented prior to beneficial use of the approved development and maintained for the lifetime of the approved development and shall not be altered without the prior written approval of the local planning authority. The scheme shall provide that each pole/wall counted light must be aligned to ensure that the upper limit of the main beam does not exceed 70 degrees from its downward vertical. All pole/wall mounted lighting shall be designed and operated to have full horizontal cut-off such that the Upward Waste Light Ratio does not exceed 2.5/5*%. The submitted scheme shall include an isolux diagram showing the predicted luminance in the vertical plane (in lux) at critical locations on the boundary of the site and at adjacent sensitive properties (including those within the scheme where appropriate). (note: * = depending on location within the scheme). The applicants attention is drawn to the Institution of Lighting Professionals Guidance Note for the reduction of obtrusive light 2011 (or later versions). It should be designed so that it is the minimum needed for security and operational processes and be installed to minimise potential pollution caused by glare and spillage).*

The above condition would also need to apply to each employment unit, including those in the 'village centre'.

Allotments

I note that allotments are proposed immediately adjacent to the proposed eastern residential area. Allotments can be associated with complaints about smoke from frequent bonfires, which is a favoured manner of waste disposal for allotment holders. I would suggest that this would need to be controlled by means of a condition relating to the management of this area, preventing bonfires taking place on this site and requiring alternative waste disposal arrangements to be provided.

Play areas/sports field

I note that the proposal includes a number of sports pitches both to the North of the site and also associated with the primary school. I understand that play areas will also be present on the site. Sports pitches and play areas can be associated with noise complaints. I would refer the applicant to the BDC supplementary planning guidance on play areas – these pitches should be sited so as to be well separated from both proposed and existing dwellings (New Farm) and I would suggest that siting, hours of use and lighting schemes will need further consideration at the detailed design emerges and would need to be controlled by means of planning conditions.

Village Centre

The 'village centre' may contain a number of retail/employment. Entertainment and community uses and as such there may be potential for residential loss of amenity. Therefore for each unit I would require full details of use, hours of operation, any extract ventilation and/or noisy plant (and

a noise assessment based on BS:4142:2014) and also details of kitchen extract ventilation and odour abatement, for any units to include a commercial kitchen.

Kind regards

Joanna Hart
Senior Environmental Protection Officer

BABERGH DISTRICT COUNCIL

MEMORANDUM

TO: Ben Elvin, Development Control Team

FROM: Joanna Hart, Environmental Protection Team

DATE: 01.06.2017

YOUR REF: B/15/01718/OUT/BEL

SUBJECT: Land North of, Woodhall Business Park, SUDBURY, Suffolk.

Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Additional information received:

- Revised illustrative Masterplan (Fig 3)
- Revised Land Use Parameter Plan (Fig 4)
- Addendum to Environmental Statement (4 parts)
- Revised Drainage Strategy
- Agents covering letter

Please find below my comments regarding 'Environmental Health - Other issues' only.

Thank you for your re - consultation on the above application.

I have no additional comments to make in addition to my existing comments made in my response of 04.04.2016. It is unfortunate that the points which I raised in my original response have not been addressed.

Kind regards

Joanna Hart
Senior Environmental Protection Officer

From: Nathan Pittam
Sent: 19 May 2017 14:20
To: X Delete Aug 17 - Planning Admin
Subject: B/15/01718/OUT/BEL. EH - Land Contamination

M3 : 193692

B/15/01718/OUT/BEL. EH - Land Contamination.

Land North of, Woodhall Business Park, SUDBURY, Suffolk.

Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel

Many thanks for your request for comments in relation to the above application. I can confirm that none of the newly submitted information would result in me amending my original recommendation for the inclusion of our standard land contamination condition with any permission that may be granted for the site.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 01449 724715

Mobile: 07769 566988

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

BE-Comments - 01/8

BABERGH/MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Chief Planning Control Officer For the attention of: BE
FROM: Nathan Pittam, Environmental Protection Team DATE: 1st August 2016
YOUR REF: B/15/01718/OUT/BEL. EH - Land Contamination.
SUBJECT: Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses ...

Address: Land North of, Woodhall Business Park, SUDBURY, Suffolk.

Please find below my comments regarding contaminated land matters only.

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

Proposed Condition: Standard Contaminated Land Condition (CL01)

No development shall take place until:

- 1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
- 2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
- 3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
- 4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.

It is important that the following advisory comments are included in any notes accompanying the Decision Notice:

Babergh District Council

01 AUG 2016

Planning Department

ES/CL/DC - 010/v2

"There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.

The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:

- Local Planning Authority*
- Environmental Services*
- Building Inspector*
- Environment Agency*

Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.

The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team."

Nathan Pittam
Senior Environmental Management Officer

From: Iain Farquharson
Sent: 30 Jun 2017 16:11:08 +0100
To: BMSDC Planning Mailbox
Subject: M3 193688: Environmental Health - Sustainability Issues Planning Re-consultation Request

Dear Sir/Madam,

The revised layout does not require further comment from this department

Thank you

Iain Farquharson

Senior Environmental Management Officer

Babergh Mid Suffolk Council

☎ 01449 724878 / 07860 827027

✉ iain.farquharson@babermidsuffolk.gov.uk

From: planning.control@babermidsuffolk.gov.uk [mailto:planning.control@babermidsuffolk.gov.uk]
Sent: 13 May 2017 14:10
To: Environmental Requests
Subject: To: Environmental Health - Sustainability Issues Planning Re-consultation Request

Reference: B/15/01718/OUT/BEL

Location: Chilton Woods Mixed Use Development, Land North of,
Woodhall Business Park, Sudbury

Proposal: Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (suitable for general use) and a district heating network); village centre

B/15/01718 - Land North of Woodhall Business Park (Chilton Woods) Sustainability Consultation
response 1/8/16

Site Description:

Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works. Chilton Woods Mixed Use Development, Land North of Woodhall Business Park, Sudbury

Summary

The applicant has not fully addressed the energy efficiency and sustainability measures that will be incorporated into the design of the proposed development. While the applicant has outlined that the site will minimise the demands for potable water, reduce energy demands, maximise energy efficiency and minimise waste, the current stage of the designs mean that the exact measures have not yet been finalised.

In order to permit planning approval from an energy/sustainability perspective, the applicant is required to progress with the submission of an Energy/Sustainability Statement which must detail how the proposed development can ensure compliance with the Building Regulations and the Babergh District Council Core Strategy, for both the residential and non-residential elements of the proposed development.

Energy/Sustainability Standards (Residential)

As a large-scale mixed-use development, the applicant is required to demonstrate how the development will secure the following energy efficiency and sustainability standards for the proposed dwellings:

Energy Efficiency (CO₂ emissions)

Although the Code for Sustainable Homes is no longer in operation, the applicant remains encouraged to achieve the energy efficiency standards previously required for a Level 4 rating. The applicant is therefore encouraged to achieve a 19% carbon dioxide emissions reduction against a Buildings Regulation Part L (2013) compliant baseline.

All developments are expected to reduce energy use, reduce carbon dioxide emissions and promote the development of renewable energy through tailored design specifications. Orientation, solar gain and building fabric issues are to be addressed.

Renewable Energy/Low Carbon Technologies:

In accordance with Policy CS 13 of the Core Strategy, the applicant is expected to demonstrate how the residential development can achieve a 10% carbon dioxide emissions reduction through the installation of a renewable/low-carbon energy technology.

The applicant has mentioned within the *Planning Statement* that solar thermal photovoltaic panels and heat pumps are considered as possible options in order to secure the required reduction in carbon dioxide emissions.

Within the feasibility study an assessment of potential technologies (including but not limited to solar thermal panels, air source heat pumps, ground source heat pumps, biomass, wind turbines combined heat and power) will need to be included with robust technical reasons for excluding any of the options.

Water Usage:

Despite the removal of the Code for Sustainable Homes, the applicant is still encouraged to ensure that the dwellings have a maximum internal water consumption rate of 105 litres/per person/per day (with an additional maximum allowance of 5 litres for external water usage). This represents the equivalent standard previously required for a Code for Sustainable Homes Level 4 rating.

Building for Life 12:

The applicant has detailed how the development can ensure compliance with the Building for Life 12 standard, including 10 'green' ratings and two 'amber' ratings for the twelve individual sections.

Exemplar Standards:

As a major development consisting of up to 1,100 dwellings, the applicant is encouraged to secure compliance with additional energy/sustainability standards in order to significantly reduce the long-term environmental impacts of the site.

In particular, the applicant is encouraged to assess the feasibility of building the proposed residential units to a Passivhaus standard.

In addition, the applicant is encouraged to assess the feasibility of securing compliance with the Building Research Establishment's (BRE) Home Quality Mark.

Energy/Sustainability Standards (Non-Residential)

As a large-scale mixed-use development including multiple non-residential elements, the applicant is required to demonstrate how the development will secure the following energy efficiency and sustainability standards for the proposed non-residential buildings:

Renewable Energy/Low Carbon Technologies:

As with the residential developments, and in accordance with Policy CS 13 of the Core Strategy, the applicant is expected to demonstrate how the non-residential units can achieve a 10% carbon dioxide emissions reduction through the installation of a renewable/low-carbon energy technology.

BREEAM:

The applicant has acknowledged that the non-residential elements of the proposed development will need to achieve a BREEAM rating of 'Excellent' (minimum score 70%). Evidence of this standard will need to be submitted through the submission of the associated BREEAM preliminary-assessments as part of the detailed design stage.

District Heating Network

In relation to Policy CS 13, the applicant has stipulated that the feasibility of a district heating network as part of the Chilton Woods scheme to provide a source of on-site, decentralised/low-carbon heat, will be investigated. The intention is for a third party to fund, install and manage the proposed facility; which will consist of a CHP/biomass (heat only) power plant. Detailed design information about the plant is not currently available at his outline planning stage.

The applicant will need to clarify the feasibility of the district heating network as part of the detailed design stage and will need to incorporate this as part of Energy/Sustainability Statement.

Reference should be made to the *Chilton Woods District Heating Feasibility, Briefing Note* (Climate Consulting, June 2014) and the *Update Briefing* (Climate Integrated Solutions, July 2015), in order to demonstrate the ability to connect the proposed buildings to the network in order to secure the stated carbon dioxide emissions reductions.

Next Steps

As stated, the applicant is required to submit a full Energy/Sustainability Statement, detailing how the development can secure the required energy efficiency and sustainability standards. The following information will need to be provided at the first instance:

- Full details of both the active and passive design measures proposed to reduce carbon dioxide emissions.
- Breakdown of energy demands (kWh) and associated carbon dioxide emissions (CO₂/kg) for the residential and non-residential elements illustrating the required 10% reduction in emissions.
- Submission of the associated SAP/SBEM results, detailing both the Target Emission Rates (TERs) and the Dwelling Emission Rates (DERs)/Building Emission Rates (BERs).
- Full set of U-Values for the proposed development.
- Details of the maximum internal water consumption rates for the residential units and how they are achieved.
- Technical details of any proposed renewable/low-carbon technology installations with robust technical reasons for the rejection of any given technology.
- Details of how the non-residential elements can secure a BREEAM rating of 'Excellent'.
- Technical feasibility of how the site will utilise connection to the Chilton Woods District Heating Network.

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Babergh District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Phil Watson Senior Landscape Officer
Sue Hooton Senior Ecologist
Natural Environment Team

Endeavour House (B2 F5 47)
Russell Road
IPSWICH

IP1 2BX
Suffolk
Tel: 01473 264777
Fax: 01473 216889
Email: phil.watson@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Your Ref: B/15/01718
Our Ref:
Date: 26/10/2016

Mr Ben Elvin
Planning Dept
Babergh District Council
Corks Lane,
Hadleigh,
Ipswich,
IP7 6SJ
Suffolk

Dear Ben,

Proposal: Outline application (with all matters reserved except for access) - Erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Location: Land North of, Woodhall Business Park, Sudbury

Based on the information provided by the applicant and a site visit carried out on the 21st March with Mrs Sue Hooton the Senior Ecologist I offer the following comments.

The site and landscape

The site is in the open countryside in plateau and valley side to the north east of the town of Sudbury. The proposal site is largely arable land divided by a pattern of enclosure that is pre 18th C in origin and has been partially modified by later boundary loss. The edge of the site includes the former airfield, RAF Sudbury which operated from 1944 to 1946. Parts of the site offer elevated views across Sudbury and the Stour Valley.

The information provided by the applicant

We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

The applicant has provided an acceptable landscape and visual impact assessment.

Assumptions used in the LVIA

It should be noted that the assessment of effects is for the completed scheme as a whole. Therefore the assessment of effects is made on the basis that the strategic planting around and within the site is put in place as part of *phase one* of construction. As a result by year one of the LVIA, that is the first year in which the whole development is built out, the strategic landscape planting is assumed to be at least 10 years old and by year 10 of the LVIA the strategic landscape planting is assumed to be 20 years old.

The landscape impacts of the proposal

The proposal will clearly have a significant impact on the character of the site, with the loss of characteristic agricultural land cover and characteristic features such as hedgerows and trees. These changes are an inevitable result of the development of this allocated site. However, the applicant has sought where possible to incorporate existing landscape features into the design of the scheme. The indirect impacts of the proposal on the character of the landscape beyond the site built footprint are more mixed. Subject to an effective and robust scheme of strategic planting the visual intrusion of the site into the wider landscape to the north will be limited.

However the land immediately adjacent to the site is likely to take on more of an urban fringe character, particularly given the location of the playing field, will be a gateway for access to the wider countryside. There is a network of formal and informal access across the airfield, which appears to be a popular dog walking area at present, (even on a cold weekday in March), as it provides dry hard surfaced routes and, informally, areas for parking.

The visual impacts of the proposal

Subject to an effective and robust scheme of strategic planting the visual intrusion of the site into the wider landscape to the north will be limited. However there will clearly be a substantial change in outlook for adjacent dwellings where views of the site are available. The acceptability of the scheme in landscape terms is therefore dependent on effective delivery of the greenspace and mitigation planting as outlined on the masterplan submitted with the application.

Recommendations

The proposal is acceptable in landscape terms subject to conditions.

CONCURRENT WITH SUBMISSION OF FIRST RESERVED MATTERS AND PRIOR TO COMMENCEMENT: SCHEME OF STRATEGIC PLANTING LANDSCAPING AND GREENSPACE

Before any development is commenced, and concurrent with the submission of the Reserved Matters application(s), A detailed scheme for the strategic planting landscaping and greenspace that will form part of the first phase of development shall be submitted to and agreed by the local planning authority. This scheme shall to include;

- a) A scheme of soft landscaping for that development area/phase, (in accordance with the submitted masterplan), drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be undertaken

We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

during the course of the development. The scheme will also include proposed planting and seeding of SuDs attenuation features and the location of any ecological mitigation and enhancement features.

Any planting removed, dying or becoming seriously damaged or diseased within ten years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

- b) A detailed scheme for the design and implementation of the strategic green space including access, interpretation, signage, hard landscaping and street furniture.
- c) A scheme of management for the detailed scheme of strategic planting landscaping and greenspace covering a period of at least 30 years. That is extending for a period of 20 years after completion of the development as a whole.
- d) All parts of the scheme shall be implemented as agreed, unless the Planning Authority gives written consent for any variation.

CONCURRENT WITH RESERVED MATTERS: DESIGN CODE

Concurrent with the submission of the Reserved Matters application (s), a Design Code shall be submitted to the Local Planning Authority. The Design Code shall pertain to and include the following: architectural design and materials, the function and treatment of open spaces, street types and materials, parking, boundary treatments (including the details of screen walls and fences for individual dwellings), movement patterns (including connectivity to the offsite public rights of way network), lighting, security principles and domestic waste bin storage arrangements. Thereafter the development shall be carried out in accordance with the approved details.

CONCURRENT WITH RESERVED MATTERS: SOFT LANDSCAPING

No development shall commence within a development area or phase, until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for that development area/phase, (in accordance with masterplan), drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be undertaken during the course of the development. Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

CONCURRENT WITH RESERVED MATTERS: HARD LANDSCAPING

No development shall commence within a development area or phase, (in accordance with masterplan), until full details of a hard landscaping scheme for that area/phase has been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (for example furniture, play areas and equipment, refuse and/or other storage units, signs, lighting and similar features); proposed and existing functional services above and below

We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features).

CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;

a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

PRIOR TO COMMENCEMENT IN ANY AREA OR PHASE: TREE PROTECTION

Any trees shrub or hedgerows within, or at the boundary of, a development area or phase that are to be retained, (including those previously planted as part of the strategic landscaping scheme or in an earlier phase of the development), shall be protected in accordance with a scheme of tree protection, (BS5837:2012), to be agreed in writing with the Local Planning Authority prior to commencement. The Local Planning Authority shall be advised in writing that the protective measures/fencing within a development area/phase have been provided before any equipment, machinery or materials are brought onto the site for the purposes of development and shall continue to be so protected during the period of construction and until all equipment, machinery and surplus materials have been removed.

Within the fenced area no work shall take place; no materials shall be stored; no oil or other chemicals shall be stored or disposed of; no concrete, mortar or plaster shall be mixed; no fires shall be started; no service trenches shall be dug; no soil shall be removed or ground level changed at any time, without the prior written consent of the Local Planning Authority.

Reasons

I have made these recommendations in order to accommodate the proposed development whilst reasonably minimising adverse effects of the proposal on landscape character and locally visual amenity, in doing so I have had particular regard for Policy CS15.

Yours sincerely

Phil Watson

Senior Landscape Officer

Your ref: B/15/01718/OUT
Our ref: Sudbury – Chilton Woods mixed use
development 00032654
Date: 31 March 2016
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Mr Ben Elvin,
Principal Planner,
Babergh District Council
Corks Lane,
Hadleigh,
Ipswich,
Suffolk,
IP7 6SJ

Dear Ben,

Sudbury: Chilton Woods mixed use development, land north of Woodhall Business Park – developer contributions

I refer to the outline planning application (with all matters reserved except for access) - erection of up to 1,100 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

I have previously provided pre-application advice.

This allocation is covered under Policy CS4 of the Babergh Core Strategy and Policies (2011 – 2031) Local Plan Document which was adopted on 25 February 2014. Policy CS17 Infrastructure Provision deals with developer contributions.

An illustrative Master Plan was submitted with the planning application.

I set out below Suffolk County Council's formal response, which sets out the infrastructure requirements associated with a scheme for up to 1,100 dwellings with employment land and primary school which need to be considered by Babergh District Council. The County Council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

The National Planning Policy Framework (NPPF) in paragraphs 203 – 206 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

Please also refer to the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk'.

Community Infrastructure Levy

Babergh District Council (the District Council) has adopted a Community Infrastructure Levy (CIL) Charging Schedule for their area which will be implemented on Monday 11 April 2016. The District Council has also published a list pursuant to Regulation 123 of the 2010 Regulations i.e. the Regulation 123 List. The Regulation 123 List identifies infrastructure that may be funded by CIL and will not be sought through planning obligations, including:

- a) Public transport improvements.
- b) Provision of library facilities.
- c) Provision of additional pre-school places at existing establishments.
- d) Provision of primary school places at existing schools.
- e) Provision of secondary, sixth form and further education places.
- f) Provision of health facilities.
- g) Provision of leisure and community facilities.
- h) Provision of 'off site' open space.
- i) Strategic green infrastructure (excluding suitable alternative natural greenspace).
- j) Maintenance of new and existing open space and strategic green infrastructure.
- k) Strategic flooding.
- l) Provision of waste infrastructure.

However this site is allocated as a strategic site and, as such, is zero rated for CIL as mitigation will continue to be dealt with via planning obligations.

I can confirm that in relation to any 'relevant infrastructure' (as defined by Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended) which is requested in this letter, since 6 April 2010 no more than four obligations pursuant to Section 106 of the Act have been entered into which provide for any such infrastructure project or type of infrastructure.

1. **Education.** Refer to the NPPF paragraph 72 which 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. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF in paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

Under Policy CS4 it states that provision will be made for approximately 3 hectares of land for education (primary school/nursery provision) and associated uses. The 'Land use parameter' plan attached to the illustrative Master Plan suggests a land reservation of 2.3 hectares for the primary school. A detailed plan of the school site to be transferred for £1 to Suffolk County Council is required to be provided by the applicant.

SCC would anticipate the following **minimum** pupil yields from a development of 1,100 dwellings, namely:

- a. Primary school age range, 5-11: 275 pupils. Proportionate contribution towards the full build cost of a 315 place primary school.
- b. Secondary school age range, 11-16: 198 pupils. Cost per place is £18,355 (2016/17 costs).
- c. Secondary school age range, 16+: 44 pupils. Costs per place is £19,907 (2016/17 costs).

The Master Plan Section 4 'Land use' identifies that community infrastructure will include a new primary school on a minimum site size of 2.3 hectares. The primary school site must be rectangular in shape of a minimum size of 2.3 hectares, on level ground and located on a gyratory road (i.e. not in a cul-de-sac) near to the centre of the development and close to other community facilities. The site must be free of contamination and cleared of any previous land use. The developer will also provide services to the appropriate boundary of the site, including adequate access by motor vehicle and on foot, ICT connections, gas, electric and water supplies plus outlet to the local sewer system. This will be provided free of charge to the County Council. The cost of all archaeological surveys and remedial work will be met by the developer.

On the basis of 1,100 dwellings are being promoted at Chilton Woods this will generate the need for a new 315 place primary school. The proportionate contribution sought towards the build cost is set out below:

- From 1,100 dwellings SCC anticipates a minimum of 275 primary age pupils.
- Estimated cost of delivering a new 315 place primary school is £5.6m [Source: Developers Guide].
- Cost per place is £5.6m/315 places = £17,778 per place.
- Proportionate contribution sought is 275 places x £17,778 = £4,888,950 (2016/17 costs).
- Trigger points for contribution payments 20% prior to first dwelling occupation, 20% prior to 150th dwelling occupation, 20% prior to 400th dwelling occupation, 20% prior to 600th dwelling occupation, 20% prior to 800th dwelling occupation.
- All contributions increased in line with the BCIS index.
- Overage contribution of £4,445 per dwelling in excess of 1,100 dwellings.
- The unencumbered freehold of 2.3 hectares to be transferred to SCC for £1 for use for education and community purposes.
- Land option can be triggered by SCC at any time after 150 dwelling occupations.

Temporary classroom costs

- Assume one temporary classroom for every 100 dwellings prior to delivery of the first phase of the new school.
- Assuming 100 house completions per annum means that about 25 primary age pupils per year will directly arise from the proposed scheme, for which temporary provision will need to be made over 4 years i.e. an additional portacabin upon 1, 100, 200 & 300 dwelling occupations. Based on an initial set up cost of £73,000 and thereafter annual hire cost of £10,348 the total estimated costs will be about £354,000 i.e. year 1 = £73,000, year 2 = £83,348, year 3 = £93,696 & year 4 = £104,044 = total of £354,000. Assuming each portacabin is for 30 pupils but direct need arising from the proposed scheme is for 25 places, means that total provision arising from the scheme is for 100 primary age pupils but overall space provision is being made for 120 primary age pupils. On this basis the cost directly arising from the proposed scheme is represented by $100/120 \times £354,000 = £295,000$.
- On the above basis SCC will receive pro-rata contributions prior to occupation of the 1st, 100th, 200th & 300th dwelling (BCIS indexed).

Secondary school and Sixth form

The local secondary schools are Ormiston Sudbury Academy and Thomas Gainsborough Academy. Based on existing school capacities and forecasts there is sufficient surplus places available to accommodate all pupils of secondary school age forecast to arise from this development. On this basis no secondary school or Sixth form contributions are required.

The scale of contributions is based on cost multipliers for the capital cost of providing a school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2016/17 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times. Once the Section 106 legal agreement has been signed, the agreed sum will be index linked using the BCIS index from the date of the Section 106 agreement until such time as the education contribution is due. SCC has a 10 year period from completion of the development to spend the contribution on education provision.

Clearly, local circumstances may change over time and I would draw your attention to paragraph 15 where this information is time-limited to 6 months from the date of this letter.

- 2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. 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. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Bill 2011 amended

Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

From these development proposals SCC would anticipate up to 110 pre-school pupils arising [based on the Section 106 Developers Guide methodology].

The agreed strategy is to deliver an early years setting which will be collocated with the new primary school. On the basis of 110 pupils arising at a cost of £6,091 per place gives a total contribution sought of £670,010 (2016/17 costs).

Please note that the early years pupil yield ratio of 10 children per hundred dwellings is expected to change and increase substantially in the near future. The Government announced, through the 2015 Queen's Speech, an intention to double the amount of free provision made available to 3 and 4 year olds, from 15 hours a week to 30.

3. **Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
 - a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
 - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
 - d. Routes to children's play spaces are safe and accessible for all children and young people.

4. **Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Suzanne Buck/Colin Bird, with a formal written response.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014.

5. **Libraries.** The National Planning Policy Framework (NPPF) Chapter 8 talks about the importance of 'Promoting healthy communities', particularly paragraphs 69 & 70. Paragraph 69 states that "the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities". Paragraph 70 talks about the need to deliver the social, recreational and cultural facilities the community needs by planning positively for community facilities such

as cultural buildings to enhance the sustainability of communities and residential environments; and to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. There is also the need to ensure that facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.

The capital contribution towards libraries arising from this scheme is £237,600, which will be spent in Sudbury on projects to expand the existing library service offer in the local area to incorporate library outreach facilities and to enhance & improve facilities at Sudbury Library.

A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

The Library Service will provide permanent pick up and drop off facilities for the lending of books, IT services available to the community and outreach staff from the main Sudbury Library.

6. **Waste.** Under Policy CS4 it states that there will be provision for a waste facility, to include a Household Waste & Recycling Centre (HWRC). Further clarification is required about the location and size of the land reservation for the HWRC, together with clarification regarding the mechanism for transferring this land to SCC.

All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

The Developers Guide sets out the approach to securing developer contributions for waste. The County Council, as Waste Disposal Authority, is pursuing a strategy of reducing reliance on landfill and moving towards alternative methods of disposal, but with the emphasis on waste minimisation and recycling. In terms of the disposal

of municipal residual waste the county council has Energy from Waste (EfW) facility serving Suffolk. In order to meet targets for reducing the land filling of biodegradable municipal waste under Article 5(2) of the EC Landfill Directive, the EfW facility is the main means of disposal. However an important part of this overall strategy is encouraging residents to minimise and recycle waste arisings to reduce the need for collection and disposal.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

In addition consideration should be given to providing a bring site area within the Local Centre.

7. **Archaeology.** This will be coordinated by Dr Abby Antrobus of SCC.
8. **Ecology, landscape & heritage.** SCC is prepared to provide advice to Babergh District Council if requested on these important matters via the agreed service level agreement.
9. **Supported Housing.** Refer to the NPPF 'Section 6 Delivering a wide choice of high quality homes' including the need for homes to be designed to meet the changing needs of their residents as they get older. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition SCC would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Babergh District Council housing team to identify local housing needs.
10. **Sustainable Drainage Systems.** Refer to the NPPF 'Section 10 Meeting the challenges of climate change, flooding and coastal change'. On 18 December 2014 there was a Ministerial Written Statement made by The Secretary of State for Communities and Local Government (Mr Eric Pickles). The changes took effect from 06 April 2015.

"To this effect, we expect local planning policies and decisions on planning applications relating to major development - developments of 10 dwellings or more; or equivalent non-residential or mixed development (as set out in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010) - to ensure that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate.

Under these arrangements, in considering planning applications, local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing

maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

- 11. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
- 12. Health impact assessment.** An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England.
- 13. Superfast broadband.** SCC would recommend that all development is equipped with superfast broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion. Direct access from a new development to the nearest BT exchange is required (not just tacking new provision on the end of the nearest line). This will bring the fibre optic closer to the home which will enable faster broadband speed. Refer to the NPPF paragraphs 42 – 43.
- 14. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its own legal costs on work associated with a S106A, whether or not the matter proceeds to completion.

In view of the Suffolk County Council land ownership issue the District Council will need to enforce the above planning obligations on behalf of the County Council until such time as the County Council sells the land, at which time the enforcement of these planning obligations will revert back to the County Council.

- 15.** The above information is time-limited for 6 months only from the date of this letter.

The planning obligations are required in order to satisfactorily mitigate the impacts of the proposed development. These impacts arise directly as a result of the increased population generated by the development in the local area. The provision of such therefore, within a S106, to mitigate for the increased demands on infrastructure from the increased population as a result of the development, is entirely satisfactory as a matter of principle, having regard to the NPPF, Babergh District Council's Local Plan and Regulation 122 of the CIL Regulations.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 & 123 Regulations.

Yours sincerely,

A black rectangular redaction box covering the signature of Neil McManus.

Neil McManus BSC (Hons) MRICS
Development Contributions Manager
Strategic Development – Resource Management

cc Iain Maxwell, Suffolk County Council
 Suzanne Buck/Colin Bird, Suffolk County Council
 Floods Planning, Suffolk County Council
 Dr Abby Antrobus, Suffolk County Council
 Phil Watson & Sue Hooton, Suffolk County Council

Your ref: B/15/01718/OUT
Our ref: Sudbury – Chilton Woods mixed use
development 00032654
Date: 15 June 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Mr Ben Elvin,
Principal Planner,
Babergh District Council
Corks Lane,
Hadleigh,
Ipswich,
Suffolk,
IP7 6SJ

Dear Ben,

Sudbury: Chilton Woods mixed use development, land north of Woodhall Business Park – developer contributions

I refer to the outline planning application (with all matters reserved except for access) - erection of up to 1,150 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

I have previously provided pre-application advice. I also previously provided a consultation response by way of letter dated 31 March 2016. This consultation response updates and replaces the previous consultation response.

This allocation is covered under Policy CS4 of the Babergh Core Strategy and Policies (2011 – 2031) Local Plan Document which was adopted on 25 February 2014. Policy CS17 Infrastructure Provision deals with developer contributions.

An illustrative Master Plan is submitted with the planning application.

I set out below Suffolk County Council's updated formal response, which sets out the infrastructure requirements associated with a scheme for up to 1,150 dwellings with employment land and primary school which need to be considered by Babergh District Council. The county council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

The National Planning Policy Framework (NPPF) in paragraphs 203 – 206 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

Please also refer to the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk'.

Community Infrastructure Levy

Babergh District Council (the District Council) has adopted a Community Infrastructure Levy (CIL) Charging Schedule for their area which will be implemented on Monday 11 April 2016. The District Council has also published a list pursuant to Regulation 123 of the 2010 Regulations i.e. the Regulation 123 List. The Regulation 123 List identifies infrastructure that may be funded by CIL and will not be sought through planning obligations, including:

- a) Public transport improvements.
- b) Provision of library facilities.
- c) Provision of additional pre-school places at existing establishments.
- d) Provision of primary school places at existing schools.
- e) Provision of secondary, sixth form and further education places.
- f) Provision of health facilities.
- g) Provision of leisure and community facilities.
- h) Provision of 'off site' open space.
- i) Strategic green infrastructure (excluding suitable alternative natural greenspace).
- j) Maintenance of new and existing open space and strategic green infrastructure.
- k) Strategic flooding.
- l) Provision of waste infrastructure.

However this site is allocated as a strategic site and, as such, is zero rated for CIL as mitigation will continue to be dealt with by section 106 planning obligations.

I can confirm that in relation to any 'relevant infrastructure' (as defined by Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended) which is requested in this letter, since 6 April 2010 no more than four obligations pursuant to Section 106 of the Act have been entered into which provide for the identified infrastructure projects.

1. **Education.** Refer to the NPPF paragraph 72 which 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. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF in paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

Under Policy CS4 it states that provision will be made for approximately 3 hectares of land for education (primary school/nursery provision) and associated uses. The 'Land use parameter' plan attached to the illustrative Master Plan suggests a land reservation of 2.3 hectares for the primary school. A detailed plan of the school site to be retained by Suffolk County Council is required to be provided by the applicant.

SCC anticipates the following **minimum** pupil yields from a development of 1,150 dwellings, namely:

- a. Primary school age range, 5-11: 288 pupils. Proportionate contribution towards the full build cost of a 420 place primary school.
- b. Secondary school age range, 11-16: 207 pupils. Cost per place is £18,355 (2017/18 costs).
- c. Secondary school age range, 16+: 46 pupils. Costs per place is £19,907 (2017/18 costs).

The Master Plan Section 4 'Land use' identifies that community infrastructure will include a new primary school on a minimum site size of 2.3 hectares. The primary school site must be rectangular in shape of a minimum size of 2.3 hectares, on level ground and located on a gyratory road (i.e. not in a cul-de-sac) near to the centre of the development and close to other community facilities. The site must be free of contamination and cleared of any previous land use. The developer will also provide services to the appropriate boundary of the site, including adequate access by motor vehicle and on foot, ICT connections, gas, electric and water supplies plus outlet to the local sewer system. In addition connection into the local surface water drainage system. This will all be provided free of charge to the County Council. The cost of all archaeological surveys and remedial work will be met by the developer.

On the basis of 1,150 dwellings being promoted at Chilton Woods this will generate the need for a new 420 place primary school. The proportionate contribution sought towards the build cost is set out below:

- From 1,150 dwellings SCC anticipates a minimum of 288 primary age pupils.
- Estimated cost of delivering a new 420 place primary school is £7.3m [Source: Concertus].
- Cost per place is £7.3m/420 places = £17,381 per place.
- Proportionate contribution sought is 288 places x £17,381 = £5,005,728 (2017/18 costs).
- Trigger points for contribution payments 20% prior to first dwelling occupation, 20% prior to 150th dwelling occupation, 20% prior to 400th dwelling occupation, 20% prior to 600th dwelling occupation, and 20% prior to 800th dwelling occupation.
- All contributions increased in line with the BCIS index.
- Overage contribution of £4,345 per dwelling in excess of 1,150 dwellings [0.25 primary age pupils per dwelling x £17,381 per place = £4,345].

- The land reserved for education use is to be capable of use i.e. with access/services at any time after 150 dwelling occupations.

Temporary classroom costs

- The estimated cost of providing a double temporary classroom (60 places) is £250,000. Based on an average of 0.25 primary age pupils arising per dwelling means that the double temporary classroom will mitigate the impact of 240 dwellings.
- Contribution to be paid prior to occupation of the 1st dwelling (BCIS indexed).

Secondary school and sixth form

The local secondary schools are Ormiston Sudbury Academy and Thomas Gainsborough Academy. Based on existing school capacities and forecasts there is sufficient surplus places available to accommodate all pupils of secondary school age forecast to arise from this development. On this basis no secondary school or sixth form contributions are required.

The scale of contributions is based on cost multipliers for the capital cost of providing a school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2017/18 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times. Once the Section 106 legal agreement has been signed, the agreed sum will be index linked using the BCIS index from the date of the Section 106 agreement until such time as the education contribution is due. SCC has a 10 year period from completion of the development to spend the contribution on education provision.

Clearly, local circumstances may change over time and I would draw your attention to paragraph 15 where this information is time-limited to 6 months from the date of this letter.

- 2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. 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. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

From these development proposals SCC would anticipate up to 115 pre-school pupils arising [based on the Section 106 Developers Guide methodology].

The agreed strategy is to deliver an early years setting which will be co-located with the new primary school. Capital contribution is £0.5m [Source: Concertus] for a new early years setting co-located with the primary school. But this will only cater for 52

children, so suggest that an additional early years setting should be delivered by the developer in the community facilities or a further capital contribution of £0.5m plus 0.2 hectares of land.

Please note that the early years pupil yield ratio of 10 children per hundred dwellings is expected to change and increase substantially in the near future. The Government announced, through the 2015 Queen's Speech, an intention to double the amount of free provision made available to 3 and 4 year olds, from 15 hours a week to 30.

3. Play space provision. Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

4. Transport issues. Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Luke Barber/Colin Bird, with a formal written response.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014.

5. Libraries. The National Planning Policy Framework (NPPF) Chapter 8 talks about the importance of 'Promoting healthy communities', particularly paragraphs 69 & 70. Paragraph 69 states that "the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities". Paragraph 70 talks about the need to deliver the social, recreational and cultural facilities the community needs by planning positively for community facilities such as cultural buildings to enhance the sustainability of communities and residential environments; and to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. There is also the need to ensure that facilities and services are

able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.

This major housing development will result in the local population increasing to something in the region of 2,875 (assuming an average of 2.5 persons per dwelling).

Sudbury Library is one of the 10 larger libraries which serve the larger conurbations of the county and their surrounding areas. Sudbury Library has one of the smallest building footprints of these largest ten libraries and its internal space is poor due to the design inside a Listed Building. Sudbury Library serves a large population which is rapidly growing and, at present, the library struggles to adequately provide enough space for services and activities due to the internal design.

It is the intention of Suffolk Libraries to use the capital contribution from the Chilton Woods development to undertake a significant capital project to make better use of the space and provide a wider service for the growing community.

The library space (excluding children's library, meeting room and staff space) is on two floors; a ground floor with fixed wall shelving and a mezzanine which follows around the outer edge of the building and is accessed by staircases and a lift. The mezzanine is not used to its potential due to its shape and it is impractical to undertake activities there due to this. Underneath the mezzanine are fixed shelves and additional shelving which abuts these at right angles and are also fixed. This shelving is old, completely inflexible, and inappropriate for users with additional needs and closes-down a space which could be used for community events and activities. These two issues within the space as described above is what is driving the intention for a large-scale capital project to transform the space to properly meet the needs of the growing town.

The capital contribution towards mitigating the impact of library provision arising from this scheme is £187,000 (circa £163 per dwelling), which will be spent at Sudbury Library to enhance & improve facilities at Sudbury Library. See table below.

Element	Explanation	Cost (£)
Mezzanine development	Complete re-configuring of the mezzanine to create a larger, usable space	90k
Lighting and other electrical works	A large proportion of the library lighting on the ground floor is housed on the bottom-side of the mezzanine and this will need significant reconfiguration.	20k
Moveable shelving	Due to the removal of current shelving, the service will need to completely re-shelf the building. This will be with modern, wheeled shelving.	30k
Making good of works	Including wall repair, re-painting and re-carpeting. Special consideration, and therefore cost, must be included into making good as the building is Grade II* listed under Historic England's grading system and repair and repaint is unlikely to be as straightforward as other library spaces.	30k
New furniture and equipment	Furniture and other incidentals put in place to create a more modern environment for library users. This includes a smaller desk to make more space, more comfortable seating for readers, better furniture for computer users etc.	10k
Fees	Architect fees, planning permission, compliance etc.	7K
Total		187k

6. Waste. Under Policy CS4 it states that there will be provision for a waste facility, to include a Household Waste & Recycling Centre (HWRC). A minimum land requirement of 2.5 acres is required although the precise location of the land reservation for the HWRC is currently unknown. SCC will need to purchase this land for the HWRC within the adjacent 16.4 hectares allocated for employment use. The agreed strategy is to relocate the existing HWRC facility from Sandy Lane in Sudbury to the Chilton Woods allocation by acquiring land upon which to build a new facility.

On this basis a proportionate capital contribution to help fund the land acquisition and build costs of the new HWRC is sought from this major housing development. Based on the most recent estimates for building a new HWRC, the construction costs are estimated to be between £1.5m and £3m (excluding land purchase costs). These build costs include preliminary site investigation works, site works, drainage, external services, access road construction, building works, design, planning, highways, legal and licence fees etc. Land values for a fully serviced site in this locality are assumed to be in the region of £400,000 per acre.

Based on the information above, assuming an average build cost of £2.25m plus land costs of £1m, gives an estimated total HWRC project cost of £3.25m. Each HWRC serves an average of 29,550 households. On this basis a proportionate contribution of £110 per dwelling is sought ($£3.25m/29,550$ households = £110 per dwelling). Total contribution sought is $1,150$ dwellings x £110 per dwelling = £126,500.

All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- *New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.*

The Developers Guide sets out the approach to securing developer contributions for waste. The County Council, as Waste Disposal Authority, is pursuing a strategy of reducing reliance on landfill and moving towards alternative methods of disposal, but with the emphasis on waste minimisation and recycling. In terms of the disposal of municipal residual waste the county council has Energy from Waste (EfW) facility serving Suffolk. In order to meet targets for reducing the land filling of biodegradable municipal waste under Article 5(2) of the EC Landfill Directive, the EfW facility is the main means of disposal. However an important part of this overall strategy is encouraging residents to minimise and recycle waste arisings to reduce the need for collection and disposal.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

In addition consideration should be given to providing a bring site area within the Local Centre. As part of good design across the whole scheme the district will need to consider issues regarding access for refuse collection vehicles and areas for wheellie bin storage/collection.

7. **Archaeology.** This will be coordinated by Dr Abby Antrobus of SCC.
8. **Ecology, landscape & heritage.** These are matters for Babergh District Council to consider and address. In terms of good design it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, birds & animals.
9. **Supported Housing.** Refer to the NPPF 'Section 6 Delivering a wide choice of high quality homes' including the need for homes to be designed to meet the changing

needs of their residents as they get older. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition SCC would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Babergh District Council housing team to identify local housing needs.

- 10. Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the Secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that, in considering planning applications:

"Local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

The changes set out in the MWS took effect from 06 April 2015.

A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

- 11. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
- 12. Health impact assessment.** An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England.
- 13. Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre

optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

- 14. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its own legal costs on work associated with a S106A, whether or not the matter proceeds to completion.

In view of the Suffolk County Council land ownership issue the district council will need to enforce the above planning obligations on behalf of the county council until such time as the county council sells the land, at which time the enforcement of these planning obligations will revert back to the county council. Legal advice will need to be sought on this point.

- 15.** The above information is time-limited for 6 months only from the date of this letter.

The planning obligations are required in order to satisfactorily mitigate the impacts of the proposed development. These impacts arise directly as a result of the increased population generated by the development in the local area. The provision of such therefore, within a S106, to mitigate for the increased demands on infrastructure from the increased population as a result of the development, is entirely satisfactory as a matter of principle, having regard to the NPPF, Babergh District Council's Local Plan and Regulation 122 of the CIL Regulations.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 & 123 Regulations.

Yours sincerely,



Neil McManus BSC (Hons) MRICS
Development Contributions Manager
Strategic Development – Resource Management

cc Carol Barber, Suffolk County Council
Luke Barber/Colin Bird, Suffolk County Council
Floods Planning, Suffolk County Council
Dr Abby Antrobus, Suffolk County Council
Phil Watson, Suffolk County Council

Your ref: B/15/01718/OUT
Our ref: Sudbury – Chilton Woods mixed use
development 00032654
Date: 16 September 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Mr Steven Stroud,
Growth & Sustainable Planning,
Babergh District Council
Corks Lane,
Hadleigh,
Ipswich,
Suffolk,
IP7 6SJ

Dear Steven,

Sudbury: Chilton Woods mixed use development, land north of Woodhall Business Park – developer contributions

I refer to the outline planning application (with all matters reserved except for access) - erection of up to 1,150 dwellings (Use Class C3); 16.4ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Babergh District Council has received additional environmental information further to the ES Addendum received in May 2017. As further information is available in relation to the Environmental Statement, the Council therefore invites further comments and representations to be made in respect of the application; to be received no later than 5th October 2017. I have previously provided a consultation response by way of letter dated 15 June 2017 and have no further comments to make in respect of the latest consultation.

Yours sincerely,



Neil McManus BSC (Hons) MRICS
Development Contributions Manager
Strategic Development – Resource Management

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
@PlaceServices



Planning Services
Babergh/Mid-Suffolk District Council,
131 High Street,
Needham Market,
Suffolk IP6 8DL

31/05/2017

For the attention of: Paul Hankins

Ref: B15/01718/OUT; Chilton Woods Mixed Use Development, Land North of Woodhall Business Park, Sudbury

Thank you for consulting us on the outline application for residential development (with all matters reserved except for access) for the erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

This letter sets out our consultation response on the landscape proposals and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

Recommendations

In terms of the likely visual effect on the surrounding landscape, the proposals will have an impact on the existing rural edge character of Sudbury as it will transform the existing character into residential and employment areas. However, the creation of community woodland area and inclusion of substantial tree/shrub planting within the proposed development will contribute to mitigating the visual impact.

The following points highlight our key recommendations for the submitted proposals:

- 1) If the outline application is approved, the transition between the existing residential areas and proposed development needs to be explored in a greater level of detail, to provide suitable levels of screening/landscape buffer, using the appropriate specification of planting which addresses the character of the surrounding landscape,
- 2) A landscape strategy needs to be produced which demonstrates how the proposals (including mapping the existing vegetation and public rights of way) link with the surrounding residential and movement network, in order to create an appropriate public realm and provide suitable levels of amenity space. The submitted illustrative masterplan (Ref: Revised Figure 3) fails to show this to the adequate level of detail. The submitted landscape strategy should include the following sections:
 - a. Context and character
 - b. Landscape Design strategy
 - c. Landscape masterplan (including residential and employment areas)



- d. Public open space
 - e. Boundary treatments (inc. sections)
 - f. Hard landscaping specification
 - g. Tree planting strategy (including residential and employment areas)
- 3) Links from the site to the existing PROWs, footpaths and road network have been incorporated into the layout; however, connections between the proposed development and Reynolds Way, Aubrey Drive, Woodhall Business Park, Mountbatten Rd and Grenville Road are unclear from the submitted information. Further clarity is required regarding the links from proposed development and Newman's Green. If the outline application is approved, this aspect should be explored to a greater level of detail.
 - 4) If the outline application is approved, it needs to ensure that new footpath links are reprovved within an adequate landscape setting to maintain a degree of openness and rural character. Further detailing should be provided in terms of surface treatment and in particular where it meets with existing road network; opportunities for passive surveillance should also be a key consideration,
 - 5) There are opportunities to expand submitted SuDS strategy to include the creation of rain gardens as part of the open swales or alternative/addition,
 - 6) The proposed community woodland, tree / shrub planting on the eastern edge of the site, the western employment area and central residential areas (including associated green infrastructure network) are mentioned to be implemented in Phase 1 (on the EIA report - LVIA section). Figure 5.1 – Phasing Plan included in the Design and Access Statement shows some of the above areas as Phase 2. The landscape implementation phasing should follow EIA information.

The proposal

The 117ha Site is located on the northern edge of Sudbury and largely comprises arable farmland dominated by large fields. Sudbury (and the adjoining settlement of Great Cornard) occupy the northern valley sides of the River Stour, with built development extending northwards onto the adjacent gently undulating and elevated plateau landscape within which the Site is located.

Overall, the landscape of the site and immediate surroundings affords varying degrees of enclosure and openness associated with both topographical variations and the presence/absence of vegetation (typically mature hedgerows and trees) and existing built form.

Review on the submitted information

Relevant to this landscape review, the submitted application includes a Landscape and Visual Assessment, Illustrative masterplan and Design and Access Statement.

The Landscape and Visual Assessment is a thorough study looking at the landscape character, visual receptors and viewpoints, landscape effects during both construction and operational phase of the development and visual effects.

As part of the outline application submission the illustrative masterplan shows the areas designated for residential development and open space including attenuation ponds as part of SuDS. The indicative layout fails to suitably demonstrate how an appropriate and connected green infrastructure responds to the layout. As these proposals develop to a greater level of detail will be required, especially the connectivity between the green spaces and enclosure along the site boundary.

There is an opportunity to explore a clearer link between the community woodland area and the proposed school site to enable and assist outdoor learning activities. The creation of avenue planting within areas of the residential development will be encouraged in order to create street typologies.



Likely impact on the surrounding landscape

Part of the Stour Valley Project Area is located within the western part of the Site and there are a number of landscape designations within the wider study area including the Dedham Vale Area of Outstanding Natural Beauty (AONB) at approx. 7.5km from the site towards the south -east.

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Ancient Rolling Farmlands landscape character type. Some of the key characteristics for the Ancient Plateau Claylands landscape character type are field pattern of ancient random enclosure, open areas created for airfields and by post WWII agricultural improvement, scattered with ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly, network of winding lanes and paths, often associated with hedges, create visual intimacy.

There is an expectation that many of these landscape principles will be preserved and designed into the emerging development proposals and that the guidance notes for Ancient Rolling Farmlands included in the Suffolk Landscape Character Assessment will be taken into consideration.

Proposed mitigation

Figure 10.24 - Landscape Incorporated Measures Plan attempts to reflect landscape mitigation measures described on Table 10.2 – 'Rationale for incorporation of environmental measures'. These mitigation proposals provide adequate screening of the development from the identified receptors.

An appropriate detailed landscape and boundary plans will be required at a later stage to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal, suitable to limit any negative visual effect the proposals may have on the existing settlement.

Yours sincerely,

Almudena Quiralte BA (hons) DipLA, ALI
Landscape Architect Consultant
Telephone: 03330136858
Email: almudena.quiralte@essex.gov.uk

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



24 June 2017

Steven Stroud
Babergh District Council
Council Offices
Corks Lane
Hadleigh
Ipswich

By email only

Dear Steven

Application: B/15/01718

Location: Chilton Woods Mixed Use Development, Land North of, Woodhall Business Park, Sudbury
Proposal: Re-advertisement - Outline application (with all matters reserved except for access) - Erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network); village centre (comprising up to 1,000m² Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Thank you for re-consulting Place Services on the above outline application.

No objection subject to securing biodiversity mitigation and enhancement measures.

I have reviewed the revised ecological information supplied by the applicant and am satisfied that there is now sufficient ecological information available to understand the impacts of development.

I am confident that the likely impacts of development have been adequately surveyed and assessed, particularly relating to Priority Habitats eg hedgerows and Protected species; particularly dormouse (Technical Note 2 Dormouse, Appendix B of ES Addendum, May 2017) and Priority habitats & species, particularly farmland birds.

The Technical Note for Dormouse provides a clear indication of mitigation for dormouse for this Protected Species; this requires details of ecological mitigation to be embedded in the landscaping works for the site, particularly the community woodland. With implementation of the ecological mitigation measures in full, including those necessary to satisfy a European Protected Species mitigation licence for dormouse, and the biodiversity enhancements secured, I am satisfied that this development will be acceptable. This will include provision of proportionate mitigation both on and off site (on land within the applicant's control).

Recommendations

To secure the implementation in full of the mitigation measures identified in the ecological chapter of the Environmental Statement (amec foster wheeler, Dec 2015) and the ES Addendum (amec foster wheeler,



May 2017), I recommend that these are all the is included in a Construction Environment Management Plan (CEMP) and a long term (25 years) Landscape & Ecology Management Plan (LEMP). This is necessary to conserve and enhance Protected and Priority Species particularly dormouse, Gt crested newts, bats, badgers, hedgehogs and breeding & wintering birds, particularly skylarks & corn bunting .

Impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

Submission for approval and implementation of the details below should be a condition of any planning consent:

I. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: COMPLIANCE WITH ENVIRONMENTAL STATEMENT ECOLOGICAL RECOMMENDATIONS

"All ecological mitigation & enhancement measures and/or works shall be carried out in accordance with the details contained in the Environmental Statement (amec foster wheeler, May 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

II. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN (BIODIVERSITY)

"Prior to the commencement of development on the peninsular in the formation of the Suds area (including vegetation clearance or ground works) a Construction Environmental (& Ecological) Management Plan (CEMP) shall be submitted to and be approved in writing by the local planning authority. The content of the CEMP shall include the following:

- a) Risk assessment of potentially damaging construction activities*
- b) Identification of "biodiversity protection zones"*
- c) Practical measures to avoid or reduce impacts during construction*
- d) Location and timing of sensitive works to avoid harm to biodiversity features*
- e) Times during construction when specialist ecologist need to be present on site to oversee works*
- f) Responsible persons and lines of communication*
- g) Use of protective fences, exclusion barriers and warning signs*

The approved plan shall be adhered to and implemented in full throughout the construction period for all phases strictly in accordance with the approved consent, unless otherwise agreed in writing by the local planning authority."

Reason: The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Conservation of Habitats & Species Regulations 2010 as amended, Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

III. PRIOR TO COMMENCEMENT: SUBMISSION OF A COPY OF THE EUROPEAN PROTECTED SPECIES LICENCE FOR DORMOUSE

"The following works to remove a section of hedge (H4) as described in ES Addendum Appendix B Technical Note 2 Dormouse to deliver Figure 3 Illustrative masterplan (amec foster wheeler, May



2017) shall not in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 53 of The Conservation of Habitats and Species Regulations 2010 authorizing the specified activity/development to go ahead; or
- b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence."

Reason: To allow the LPA to discharge its duties under the UK Conservation of Habitats and Species Regulations 2010, as amended, Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

IV. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: FARMLAND BIRD MITIGATION STRATEGY

"A farmland bird mitigation strategy shall be submitted for approval and implemented in full to mitigate the loss of habitat & disturbance. This shall be based on up to date breeding and wintering bird surveys."

Reason: To allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)

V. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: LIGHTING DESIGN SCHEME

"Prior to occupation, a lighting design scheme for biodiversity" shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

VI: CONCURRENT WITH RESERVED MATTERS: FURTHER SURVEYS & ASSESSMENTS FOR DEVELOPMENT PHASED OVER A PERIOD OF TIME

"Prior to commencement, within any development area or phase, further supplementary ecological surveys for breeding birds and reptiles shall be undertaken for the land affected by that phase or area, to inform the preparation and implementation of corresponding phases of ecological measures required. The supplementary surveys shall be of an appropriate type for the above habitats and/or species and survey methods shall follow national good practice guidelines."

VII: PRIOR TO FIRST OCCUPATION: LANDSCAPE & ECOLOGY MANAGEMENT PLAN

"Prior to 1st occupation of any phase, a Landscape and Ecological Management Plan (LEMP) shall be submitted to and be approved in writing by the local planning authority. The content of the LEMP shall include the following:

- a) Description and evaluation of the features to be managed and enhanced
- b) Aims and objectives of management
- c) Appropriate management options for achieving aims and objectives
- d) Prescriptions for management actions



- e) Preparation of a work schedule (including annual work plan capable of being rolled forward over a five year period)
- f) Details of the body or organisation responsible for implementation of the plan
- g) Ongoing monitoring and remedial measures

The LEMP shall also include details of the legal and funding mechanisms by which the long term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."

Please contact me with any queries.

Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant
Place Services at Essex County Council
sue.hooton@essex.gov.uk
07809 314447

Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

From:Richard Morgan
Sent:15 Jun 2017 09:18:50 +0100
To:BMSDC Planning Area Team Green
Cc:Lavenham Society;Jane Gosling;Philip Snelling
Subject:Chilton Woods Development - Comment from Lavenham Society

Comment by The Lavenham Society on Chilton Woods Development

Ref: B/15/01718 as amended 2017
Chilton Woods Mixed Use Development, land North of Woodhall Business Park, Sudbury

The Lavenham Society has considered the impact of this application and the main issues of concern to us are as follows:

As it stands the Chilton Woods proposal fails on two major grounds - infrastructure provision and affordable housing. Although this is an outline proposal both of these should be addressed at this time. In more detail (and in support of similar earlier comments made by Lavenham Parish Council) -

- **Infrastructure investment:** to safeguard wider local provision of services; including utility services and traffic pressures, both local and further afield, need to be planned and provided before any development takes place. I understand that SCC Highways Consultants and others called for and were assured that a revised transport assessment would be forthcoming, however it appears this has not materialised.
- **Landscaping of the site:** to be put in place at the outset of the development to allow it to mature.
- **Site Management Plan:** to avoid any site traffic coming through Lavenham and surrounding villages.
- **Affordable rental housing provision:** requires early consideration and must meet the minimum 35% requirement set out in the Babergh D C Core Strategy, otherwise development pressure on villages, including Lavenham, could increase.
- **Education:** delay in the building of the new primary school within the scheme is not acceptable. Any delay leading to accommodation of the children at nearby schools will in turn lead to extra travel outside the scheme. In addition, nearby schools may also have to accommodate children from other new housing schemes proposed in those areas. Therefore, any school new-build should be built much earlier in the development cycle.

Yours faithfully
Richard Morgan
Lavenham Society Administration

Objection to planning application B/15/01718 'Chilton Woods' Babergh District Council, Suffolk, 23rd June 2017.

The *Sudbury Area Green Belt Group* **objects** to aspects of the application for outline planning permission because:

1) The current online Outline Planning Application Environmental statement December 2015, Vol 1 page 9 (1.1.8) is misleading. It states '*An extensive green space network would be provided*'. However in the terms of Natural England's recommended *Accessible Natural Greenspace Standards* it is not all green, and is certainly not all natural and not all accessible. In fact the largest part of this network, ie around the airfield, consists of sports pitches, arable field (the county wildlife site), and allotments. We therefore challenge the claim to be 50% green space, a figure which relies just on a line drawn out into existing countryside.

2) The Outline Planning Application Environmental statement, Vol 1 page 11 (info box) listing what has been assessed in the EIA, includes '*effects on local communities effects on landscape features and views biodiversity effects on species, habitats and designated sites*'. We contend that the plan fails this EIA test, because it does not '*avoid, minimise or offset adverse effects and where appropriate deliver environmental improvements*'. We strongly **object** as the ES fails to address the effect on the existing populated area of Sudbury and its natural assets including urban fringe wildlife; since in the new scheme it will be much further to countryside from almost the whole populated area of Sudbury (it should surely also be recognised that this area has lost Peoples Park and all the open fields on its north-west edge, to recent building). This is despite the issue being minimally acknowledged in Vol 1 Page 12 (1.1.17), where a negative effect listed is *that 'views across large scale open fields will be replaced'*. We submit that because this development cuts the existing town off from the countryside, and builds over the urban fringe with its wildlife, then to meet the EIA test, requires amendment to include a substantial green space nearer town. In particular, we **object** unless the plan allows for direct access to open fields from the Tesco pedestrian underpass, by moving the 'hotel site' further back from the bypass by 100metres.

3) Vol 2, Chapter 1, page 14 of the ES (1.2.4) tells us the EIA requires an assessment of '*direct effects and any indirect, secondary, cumulative positive and negative effects of the development*'; and Vol 1 page 11 (1.1.12) refers to '*incorporating measures to avoid, minimise or offset adverse effects*'. We contend these aims have not been addressed in several very important respects.

For instance, we need first to point out The project's 'green features' may be fine for the people who will live within the development, but for Sudbury's existing population it is entirely loss; and that since the distant airfield area will be no more open to the public than at present, this is no mitigation.

On the same point, we need to point out what is well-known, that the Chilton Woods plan is in a context that the rest of the north and eastern perimeter of Sudbury and Great Cornard is also mostly earmarked for developments. The statement on page 35 (4.5.5), about only using '*information about other developments that are under construction or that have been granted planning permission and are likely to be built*' seems incredible, as it sets up a domino effect where in future each successive planning application is supported with a statement that there is 'no predictable cumulative effect'. We **object** because a) such poor logic could only be accepted if the Babergh Core Plan contained a definite commitment to a substantial 'green belt' adjacent to the existing town, and b) that approach fatally invalidates the entire 'baseline' concept as applied on page 35 (4.5.4 to 4.5.10); and the fact the Annual Monitoring Report has gone out of date so quickly, with building started on sites not mentioned, illustrates this.

4) We therefore submit that the plan does not meet this EIA test. It would require retaining an additional adequate linked section of existing green land, that is near town, and amounts to a corridor for people and biodiversity; this would need a link a) west from Tesco, and b) east from the Tesco pedestrian underpass, to Woodhall Moat and following the Aubrey Drive greenspace to Wheldon's orchard (to meet the tree belt from Waldingfield Road to Chilton Church). The sites which would completely block this are a) the area of the proposed Hotel site (we also object to the disappearance in this version of the plan, of the traditional path west from the farm gateway at Tesco entrance); b) the overly narrow hedge link on the town's north edge (south edge of Chilton Woods) east from Tesco to Reynolds Way (then failing to reach the Aubrey Drive green space); and incidentally c) the inevitable planning application for Wheldon's orchard (known because it was formerly rolled into the previous Chilton Woods Vision). We submit it is essential that all three should be preserved as green space,

Accordingly we **object** unless the following are reserved as green space: a) a block of at least 1 hectare of accessible green space, of average width 100m, west from the Tesco farm gateway, meeting a wide path beside the by-pass embankment, to the bridleway from St Bartholemews, with pedestrian and wildlife tunnels under any embankment leading from the bypass into Chilton Woods (This space and path is also an essential alternative to the pavement along the by-pass itself, which is horrendous: narrow, noisy, monotonous, choked by overhanging bushes); and b) a width of at least 50m east from the Tesco underpass, along the north edge of the present town; ie the Woodhall moat site, Mountbatten Rd to Hawkins Rd, north along Acton Lane, and from Reynolds Way turning, to Aubrey Drive green space. We will be proposing in due course that all these green links on the edge of town be fully committed to in the Local Plan, so that they will be binding on planning applicants.

5) The ES fails because it allows a situation where the population on the north side of Sudbury could only generally get to adequate green space by vehicle. By stating Chilton Woods is within 2 kilometres of the Common Lands meadows, the ES implies a reference to the 2km figure in Natural England's *ANG Standard*, however this standard also states that states people should have '**at least one accessible natural greenspace of at least 2 hectares in size, no more than 300 metres (5 mins walk) from home**' – most of Sudbury's population does not, so this overriding need can only be provided by retaining a 'green belt' on the current north-east perimeter of Sudbury and Great Cornard.

We **object** because the proposed 'green infrastructure' is mostly on the north edge of the development, too distant from town to meet the accessibility test. From there to where Sudbury people presently live, is a 1 km walk from the airfield via Chilton Grove and the narrow pavement on the busy Waldingfield Road, to the MacDonalds roundabout; and 0.9 km on the central public footpath via Grenville Road and the bypass footbridge leading towards Woodhall School. (The walking distance from the south edge of Chilton Woods at Aubrey Drive to the Common Lands is 2km, via the footbridge, Peoples Park and then busy East Street and Town Centre to The Kingfisher; or from Woodhall Moat is 1.25km on foot via the Tesco underpass to the Melford Road meadow entrance).

6) Vol2 Chapter 12 (page 207 et seq) fails to recognise the likely harm to wildlife species from building close to hedges, or to adequately address the harm of translocation and hedge removal, especially in the case of dormice and great crested newt. Therefore we **object** to the application and will only accept the plan on conditions that a) the Council will consult closely with Suffolk Wildlife Trust, b) any plan should be fully agreed with SWT in advance, and c) the County Council makes accompanying environmental improvements on its land within 1 kilometre of Chilton Woods,

including on the site we refer to below as 'the hotel site area' and on and alongside the embankment of the adjoining by-pass. We would also insist on maximum restoration of both streams on the site.

7) Chapter 5 of the ES, page 37 gives the 3 NPPF dimensions of economic, social and environmental; and we contend that while the Chilton Woods plan is an attempt to meet this, it fails unless a better wildlife corridor is created. Therefore, as much as we support the benefits of this development, we have to very strongly **object** to the application in its current form.

By way of contrast these plans do not remotely compare with the Suffolk exemplar ie Moreton Hall, that Babergh planning has given in another document the '*Green Infrastructure Framework for Babergh District August 2012*'. Between the Moreton Hall development and town is a space 100m wide to the Bury by-pass, plus a block of nearly ½ sq km, and a further 150 – 300m wide beyond the by-pass to the town of Bury St Edmunds. Hence our proposal for a green southern perimeter of width at least 50m east of Tesco, and 100m west of Tesco, can be seen is modest by comparison and not intended to dilute the application's aspirations for housing and employment.

Therefore we **object** that only subject to our proposal, could the application meet the '*economic, social and physical needs of the area*' as laid down on page 37; and we also **object** unless '*the area*' is explicitly stated to include the present town of Sudbury.

8) We believe that Babergh District Council has the power to carry out these measures, and we do not believe this will reduce its ability to meet government targets for housing or industry. We further believe it is possible to give outline consent to Chilton Woods, to start development, particularly of social housing, to find money for public transport, an electricity supply and a primary school, such that Planning Inspectors need not agree to unwelcome private applications for haphazard developments locally; and further we submit that, given apparent low demand for new building sites, especially industrial, there will be further time on Babergh District Council's side, to refine its long-term plan and identify alternative optimal sites across Babergh.

9) We say that Babergh should continue seeking partial alternative sites to Chilton Woods, not least because we share many of the concerns of Sudbury area residents over the problems the potential size of development will cause: of traffic, of such a congested development being unattractive to residents, of likely future employment being commuting rather than local, of school availability, of Sudbury losing its very special market town identity, of extra pressure on public facilities. We further believe Babergh needs to improve its public consultation processes, with better information and displays, to offer the public a say comparable to that given to government guidance, ensure more plans that are drawn up to more than the bare legal minimum, and convince the public that excessive development will not be favoured for an ulterior motive of the government financial incentives it brings.

Submitted June 2017, by

Janis Bear, Sudbury

Jill Fisher, Sudbury

Mark Fisher, Sudbury

Christopher Francis, Gt Waldingfield

Karen Franklin, Sudbury

Andrew Glosby, Gt Cornard

Lincoln Grounds, Sudbury

Lorna Hoey, Sudbury (Chair, *The Sudbury Society*)

Richard Kilshaw, Polstead
Simon Lee, Sudbury
Nick Miller, Assington (Secretary, *Sudbury Area Green Belt Group*)
George Millins, Gt Waldingfield
Sally Moggridge, Chilton
Martin Peers, Chilton
Andrew Phillips OBE, Sudbury
Frances Porter, Sudbury
Janet Smith, Sudbury (Chair, *Greener Sudbury*)
Sue Thoma, Gt Cornard
Stephen Thorpe (Chair of Planning, *The Sudbury Society*)
Dean Walton, Gt Cornard

