



4002/14

DC Committee Constraints



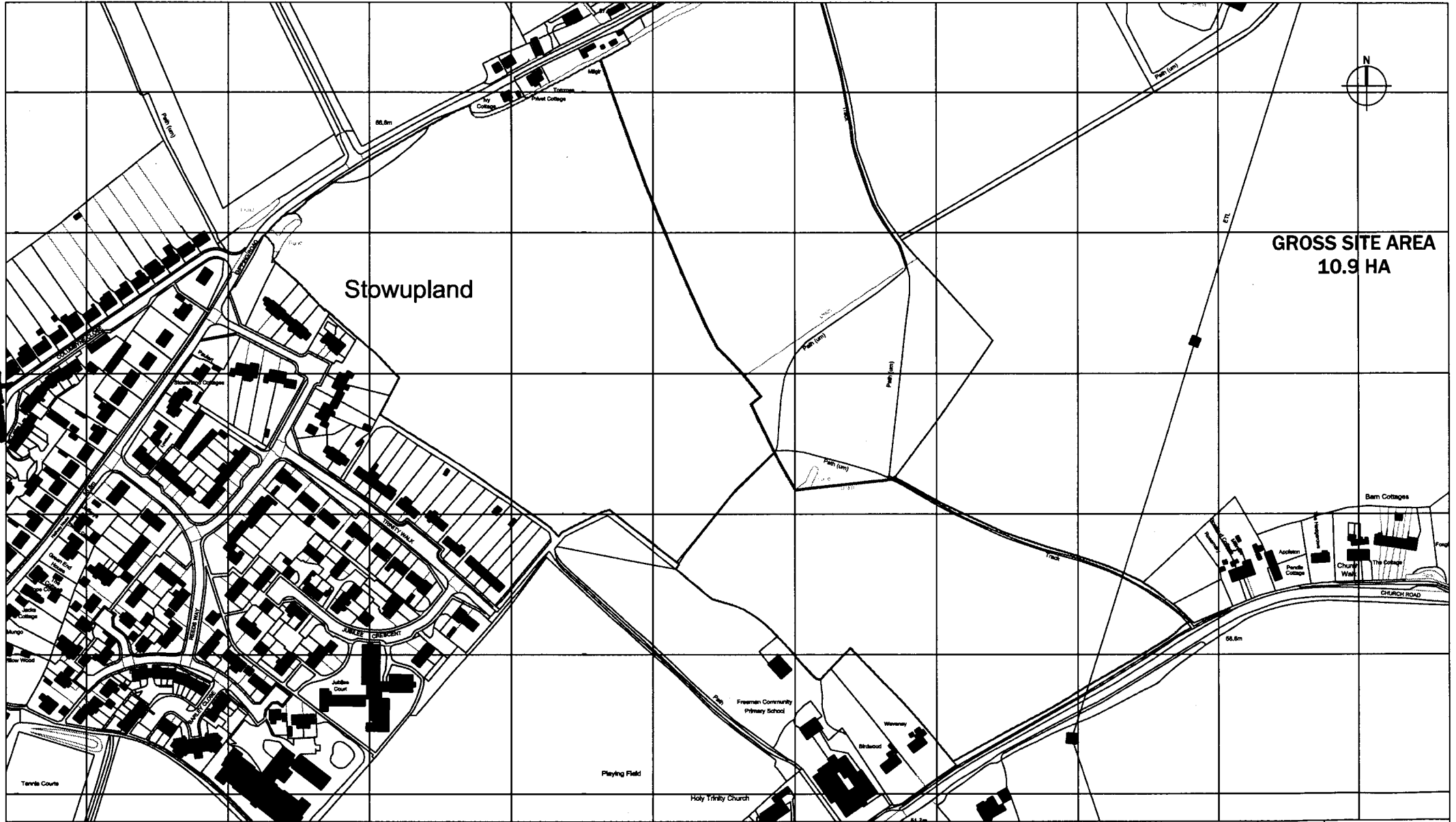
MID SUFFOLK DISTRICT COUNCIL

131, High Street, Needham Market, IP6 8DL
Telephone : 01449 724500
email: customerservice@csduk.com
www.midsuffolk.gov.uk



SCALE 1:5000


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GROSS SITE AREA
10.9 HA

Stowupland

CHURCH ROAD, STOWUPLAND



GLADMAN
Gladman House, Alexandra Way
Congleton Business Park
Congleton, Cheshire
CW12 1LE
Tel: 01260 250000
Fax: 01260 250001
www.gladman.co.uk

D	05-03-15	EJH	Blue Line added
C	26-11-14	EJH	Red Line Ammended NW Boundary
B	12-08-14	EJH	Red Line Ammended NE / SE Boundary
A	23-06-14	EJH	Red Line Ammended NW Boundary
Rev	Date	By	Revision notes

Status
PLANNING

Project
CHURCH ROAD, STOWUPLAND

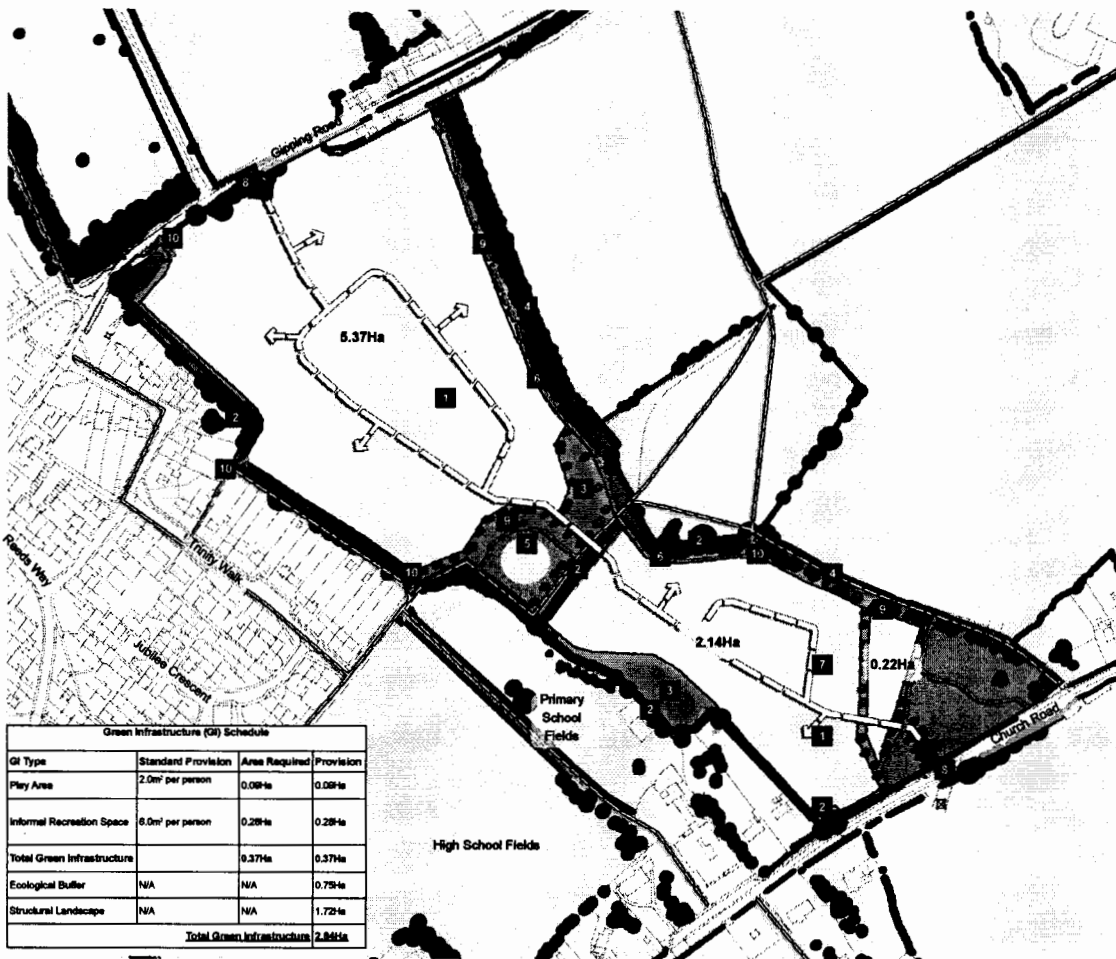
Title
LOCATION PLAN

Drawn by
EJH

Issue date
NOVEMBER 2014












Scale(s)
1:2500 @ A3

Drawing No
100-001 REV D



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KEY:

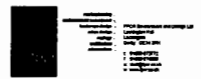
-  Application Boundary: 10.87Ha
-  Proposed Residential Development
7.73Ha) Up to 190 dwellings @ 25dph
-  Retained Existing Trees/Hedgerows
-  Indicative Drainage Pond: 0.3Ha
-  Proposed Landscape Buffer
Planting
-  Proposed Equipped Area of
Play 0.09Ha
-  Proposed Pathways
-  Indicative Main Street
-  Potential Main Access off Church Road and
Gipping Road
-  Proposed Public Open Space (including
informal footpaths and biodiversity
enhancement) : 2.84Ha
-  Potential Footpath Links

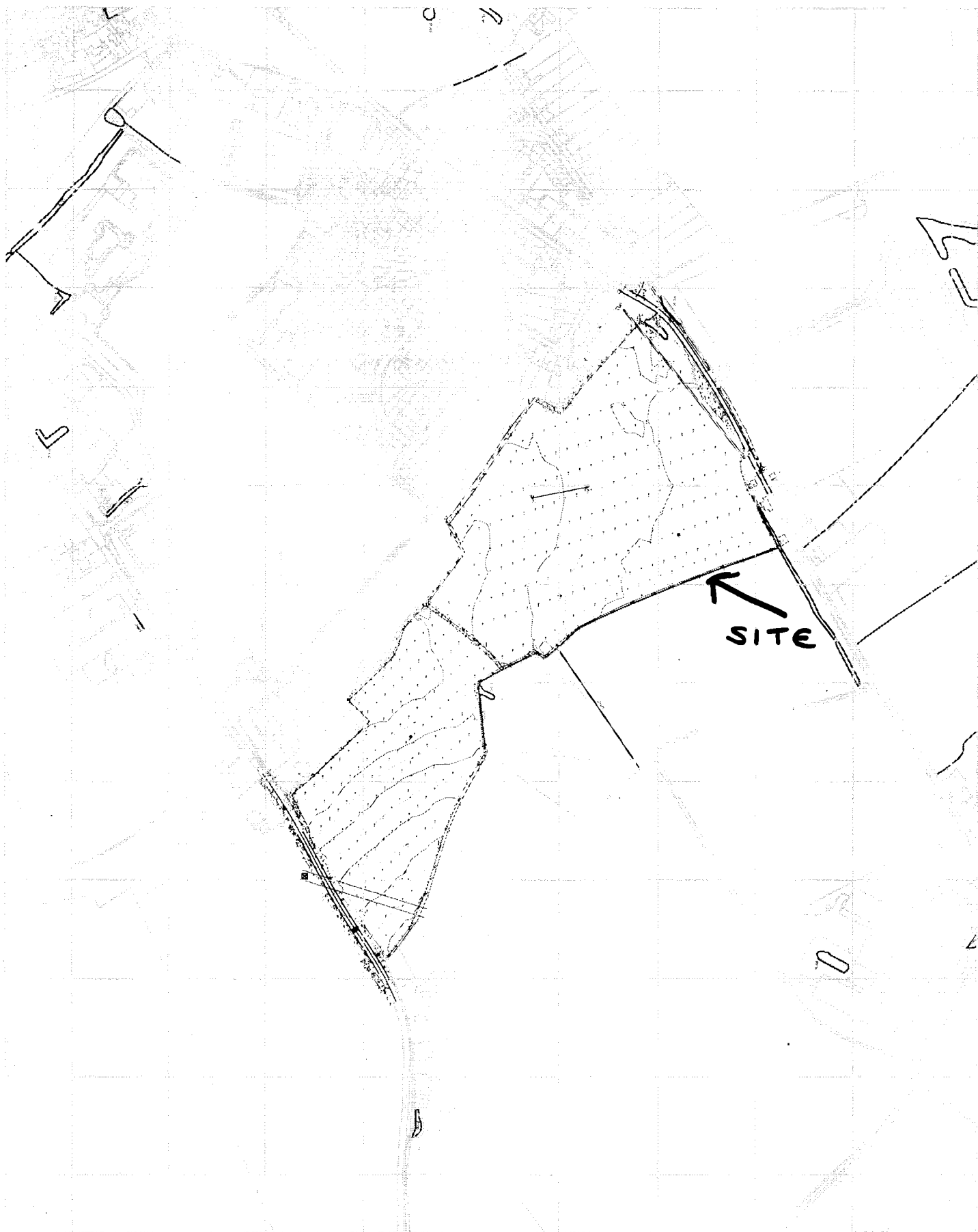
Green Infrastructure (GI) Schedule			
GI Type	Standard Provision	Area Required	Provision
Play Area	2.0m ² per person	0.09Ha	0.09Ha
Informal Recreation Space	6.0m ² per person	0.28Ha	0.28Ha
Total Green Infrastructure		0.37Ha	0.37Ha
Ecological Buffer	N/A	N/A	0.75Ha
Structural Landscape	N/A	N/A	1.72Ha
			Total Green Infrastructure: 2.84Ha



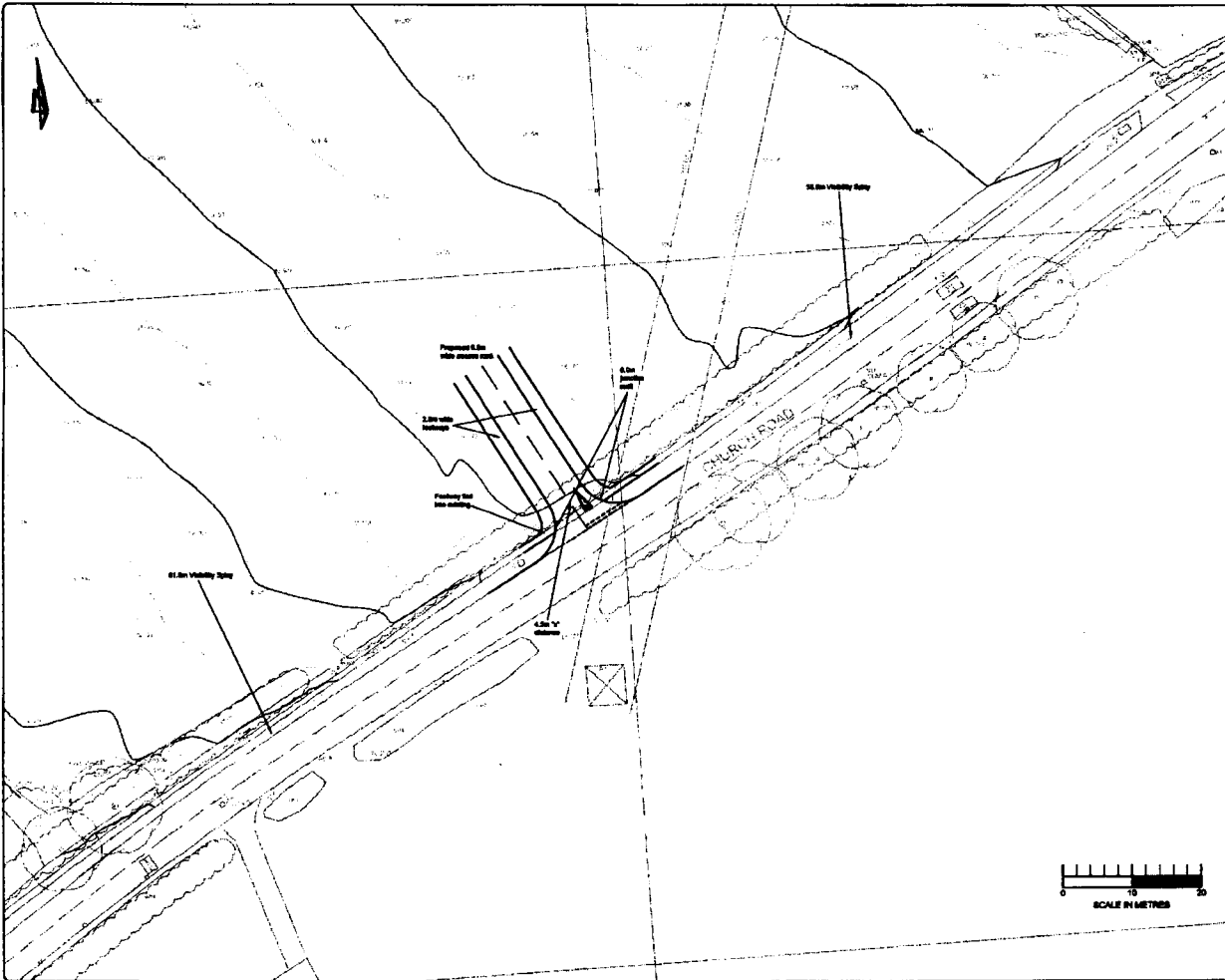
DEVELOPMENT FRAMEWORK

6394-L-03 F





4002114



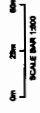
<p>SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION</p> <p>CONSTRUCTION</p> <p>MAINTENANCE / CLEANING</p> <p>DECOMMISSIONING / DEMOLITION</p>	
<p>Hydrock</p> <p>20 Stowupland Road Stowupland, Notts NG16 5JG Tel: 01930 222 000</p>	
<p>Gladman Developments Ltd.</p>	
<p>Church Road Stowupland</p>	
<p>Church Road Site Access</p>	
<p>PRELIMINARY</p>	
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MAPS NOT ORIGINATED TO BEAL TIME ON

NOTES AND AMENDMENTS
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REVISIONS

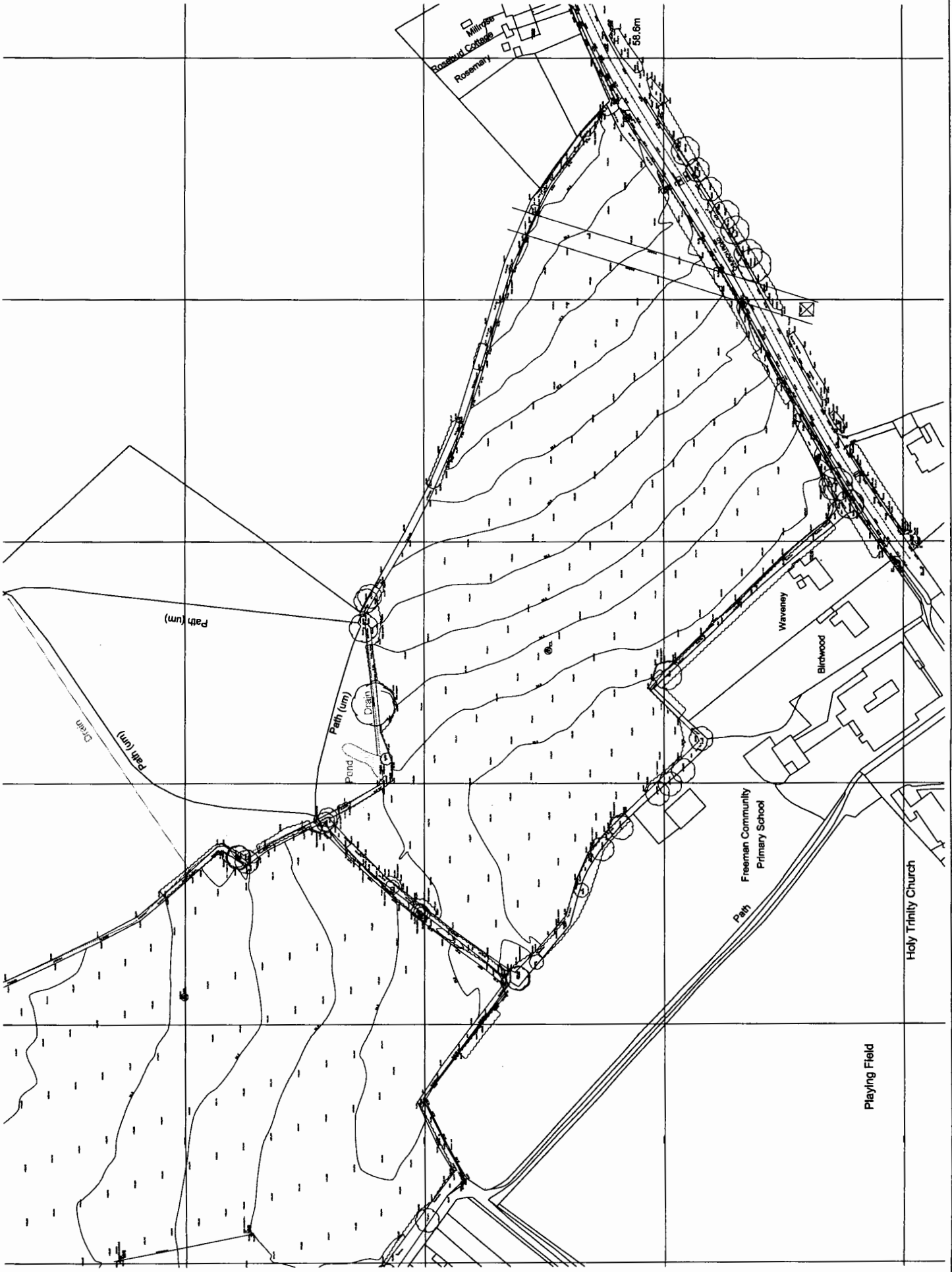


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[Symbol]	Electricity
[Symbol]	Water
[Symbol]	Telephone
[Symbol]	Gas
[Symbol]	Other

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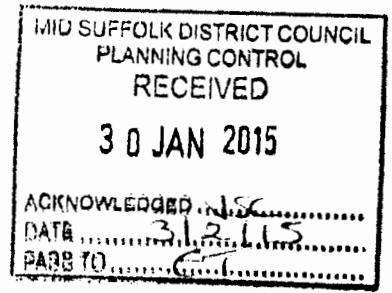
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STOWUPLAND PARISH COUNCIL
2 Broomspath Road, Stowupland, Suffolk, IP14 4DB
Clerk: Claire Pizzey
☎ 01449 677005 (10am-noon Tuesdays-Thursdays)
✉ clairepizzey@outlook.com

Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL



30th January 2015

Dear Mr Isbell

Application Number 4002/14 – Outline application for residential development of up to 190 dwellings with access, landscape, open space and associated infrastructure. Location land between Gipping Road and Church Road, Stowupland

Stowupland Parish Council **OBJECTS** to the above planning application. The Parish Council are not opposed to housing development in a suitable location.

Please see the comments below from the Parish Council relating to their objection.

- The Parish Council feel that the proposed development is too large for the village, it is in the wrong location and the proposed development in unsustainable. This number of dwellings would add more than 20% to the population of the village. This would simply be too much growth and would overwhelm the village. In talking about the three dimensions of sustainable development the NPPF says in paragraph 10:

“Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.”

This is the context for applying the presumption in favour of sustainable development (set out in paragraph 14). The Suffolk S106 letter indicates the extent of the problem from the schools point of view. With the move from three tiers to two the village will experience additional traffic movements at both schools. If this development is allowed the result at peak time will be people from the new development driving their children to school at Cedars Park and Stowmarket High School at the same time as the peak traffic movements at the two village schools.

Stowupland is a well-balanced community – it is a real rural village with a good mix of people, many who have lived here all, or most of their lives. This amount of development will have a big and detrimental impact on the social infrastructure of the village. We are not a dormitory village, the sports and social facilities are well supported, and whilst we welcome new residents the proposed quantity of new residents would put a strain on some of these facilities, particularly football.

There is some employment in and around the village, but the reality is that most will commute outside the village and the area to work. The reality is that most of these trips will be by car.

This proposed development will be in addition to the planned growth set out in the SAAP, and therefore the additional population will place an unsustainable demand on health care provision and other services and facilities (including leisure) in the Stowmarket area. If this development goes ahead it will set a precedent for similar unplanned development in other parishes increasing the stress on services and facilities.

Whilst most people are happy to see some new housing in the village the amount proposed in one location is simply too much.

- Traffic from this development will have a detrimental impact on the whole village. The access onto Gipping Road is totally unsuitable and this has been endorsed by Suffolk County Council.

Gipping Road is a country lane with no footways, and with the national speed limit from Rendall Lane through to Columbyne Close. This country lane is used by local traffic, walkers, horse riders and cyclists, and the impact of the proposed amount of development is unthinkable. This access, and the amount of traffic using it will cause danger to all users of this road, it will have a huge, detrimental impact on the residential amenity of residents of properties adjacent to the site in Gipping Road, and it will have a detrimental impact on the setting and historical context of Columbine Hall.

190 dwellings will result in at least 300 vehicles, plus delivery vehicles, refuse lorries etc. Church Road, the A1120, is the main coast road (it is the designated tourist route). There are peaks on weekdays, fine weekends, particularly Sundays (when pelotons of cyclists are a regular feature throughout the year), and the road is also well used by lorries and farm traffic, and is the main route for emergency vehicles. SCC Transport comments indicate that public transport links are insufficient to support such a large development, and the inevitable consequence of this is a large amount of additional traffic using the lanes and A1120 causing congestion and danger to all.

At peak times the junction with the B1115 by the garage is congested and sometimes dangerous with some vehicle drivers trying to by-pass the traffic waiting to turn right onto the B1115 by mounting the verge. This junction is very close to the garage used by residents to buy newspapers and other items, and by students from Stowupland High School. There has already been one fatality here, and the inevitable amount of traffic movements from the proposed site would be detrimental to road safety from the point of view of all road users and residents in the village

The amount of traffic movements from a development of this size is unsustainable and is against the core principles of sustainable development.

- A development of such a large area will result in loss of residential amenity for those living close to it; and a loss of visual amenity to all residents of the village, particularly walkers, riders, runners, and all who use the footpath network and pass the site.

It is typical High Suffolk countryside as evidenced by the Landscape and Visual Appraisal submitted with the application. However, this report fails to place the proposed development in a wider context. The photographs submitted give a hint of this, but a site visit and walk around the network of rights of way reveal wide views from, through, and into the site from beyond the boundaries. It should be noted that the photographs are taken with the trees and hedgerows in full leaf. On a clear day the value of this site to the wider countryside, the area around the village that is an essential part of its character, is very evident. The fact that the High Suffolk landscape in this area does not have a national or local designation does not mean that it is not of value to the immediate and wider area.

The development will change the character of the area. The inevitable urbanisation, including roads, and street lighting, will be out of character with the settlement pattern in the village. The greens and playing fields, and well-treed boundaries are a dominant feature of the village. Currently there is a clear sense of where the village is and where the countryside starts. SAAP Map 6.1 Visually Important Open Spaces illustrates this very well. A housing estate, no matter how well designed, will look (and feel) totally out of place in this location.

Paragraphs 6.51 to 6.55 of the SAAP describe the context of the villages surrounding Stowmarket. Paragraph 6.51 states:

".....These villages are an essential part of our rural way of life and their unique character and local distinctiveness needs to be maintained and protected. This is especially the case for the villages surrounding Stowmarket where the future growth of the town may require the use of land."

SAAP Policy 4.2 Providing a Landscape Setting for Stowmarket states:

"..... 5) The council will resist development that would have a harmful effect on the value of a Visually important Open Space and will require developments that may have a detrimental effect on the quality of a Visually Important Open Space to be sensitively designed to minimise these effects."

The wider landscape character includes listed buildings and cottages that are typical of this 'big sky' Suffolk landscape. This is described in paragraph 9.9 of the SAAP, and Policy 9.5 Historic Environment, particularly paragraph (iii). This landscape provides an essential setting and historical context for the II* listed Columbine Hall, and the proposed development would destroy this, and scar the rural setting of the village including the outlying cottages and farmhouses.

The views of painted gables and roofs of cottages and listed buildings, the small groups of small painted cottages like those in Gipping Road adjacent to the site, and the groups of trees, hedgerows, and the remnants of ancient woodland (particularly Gipping Wood, and woodland at Combs Wood, and Badley), and views across the valleys (to Haughley and Old Newton to the north, and Badley, Combs, Barking and Wattisham to the south) will all be irrevocably damaged by this development.

Once developed the character and appearance of the rights of way that cross and run alongside the site will be lost forever. This change will inevitably lead to the loss of natural habitats in the ditches, ponds, trees and hedgerows. The reported sightings of protected species such as the hare are really only the tip of the pyramid. Country dwellers don't think to report these things – it is part of living in the countryside.

This is an outline application with all layouts and sketches clearly marked as indicative. Once outline permission is granted and the land sold a house-builder can interpret "good design" in a number of ways, and the resulting layout and design of houses may look nothing like the sketches. This amount

of new development is out of scale and character with the village, and will have a detrimental impact on the rural character and setting of the village. New dwellings are not going to be of the same proportions as the low density housing along Church Road and the cottages on Gipping Road and Church Road, and will look out of place next to a rural village.

- The proposal is in the countryside outside the settlement boundary for Stowupland and it is contrary to extant policies from the 1998 Local Plan, Mid Suffolk's Core Strategy, the Core Strategy Focussed Review (CSFR), the Stowmarket Area Action Plan (SAAP), and does not comply with any of the exception criteria for development in the countryside set out in paragraph 55 of the NPPF.

The proposal is contrary to: Policy CS2 Development in the countryside and Countryside Villages; CS5 Mid Suffolk's Environment (particularly Landscape and Historic Environment); FC2 Provision and Distribution of Housing (190 dwellings on greenfield land is nearly double planned in the first five year period for all Key Service Centre villages in the district, and nearly all of the greenfield site provision in all KSC villages for a ten year period).

The SAAP allocates land for growth in and around Stowmarket, Mid Suffolk's largest and most sustainable settlement. Stowupland is one of two Key Service Centres in the SAAP, and the document explicitly states, at paragraph 6.14: *"The Core Strategy includes provision for housing allocations in key service centres and primary villages. The Stowmarket Area Action Plan does not propose any allocations in its villages, because they are close to Stowmarket, which is the most sustainable location in relation to local employment and services."*

Paragraph 6.15 goes on: *"There will be scope for smaller scale housing development in some of the adjoining villages which have local services. These smaller scale development opportunities will be expected to share a fair proportion of the infrastructure delivery costs"*

The application site was not considered during the examination process, and the SAAP was not the subject of legal challenge following adoption.

Mid Suffolk has two up-to-date local plans, both post-NPPF.

- The Parish Council has recently decided to produce a Neighbourhood Plan, and approval of this development would deprive the community of deciding for itself how much growth is needed and where it should go. This type of proposal is the very antithesis of Localism. It will also weaken the approved local plans, the CSFR and the SAAP, as it will create a precedent that others will inevitably seek to follow.
- Much is made of the alleged lack of a five-year housing land supply in Mid Suffolk. This was one of the main arguments for the appellant in the G R Warehousing appeal at Mendlesham. Paragraph 22 of the Inspector's decision letter dated 7 January 2014 states "Turning to housing supply, it seems to me that the Council's approach accords acceptably with guidance in the Framework".

The AMR April 2014 clearly shows a 5.5 year supply of housing land. The Council made their position clear to Gladman at the pre-application stage. The planning officer's email is reproduced in the appendices to the submitted Statement of Community Involvement. The email dated 14 October 2014 states clearly that "Mid Suffolk District council currently has a robust five year housing land supply".

In recent months appeals have been dismissed where Inspectors have acknowledged that the councils could not demonstrate a five-year housing land supply but that other planning issues significantly outweighed the benefits of these schemes. The Report of the Communities and Local

Government Committee on the Operation of the National Planning Policy Framework published on 9 December 2014 brings this issue, and this type of "Gladman" application to the attention of the Minister, and the third change noted in the Summary says "Provisions in the NPPF relating to the viability of housing land are leading to inappropriate development: these loopholes must be closed." The CPRE published a report in September 2014, Targeting the Countryside which calls on the Government to (amongst other things) "Amend paragraph 49 of the NPPF so that there is not an automatic presumption in favour of granting planning permission where the local authority is unable to demonstrate a five year land supply." The research behind this report "Housing Supply Research: The impact of the NPPF's housing land supply requirements on housing supply and the countryside" (carried out by Parsons Brinckerhoff) includes many appeal case studies, and is available on the CPRE website.

The presence or lack of a five-year land supply doesn't override the need to determine the application in accordance with the development plan. The proposed development is unsustainable and contrary to the NPPF, and contrary to policies in the 1998 Local Plan, the adopted Core Strategy and Focussed Review, and the Stowmarket Area Action Plan. There are sound planning reasons why the application should be refused, as the adverse impacts of this proposed development would significantly and demonstrably outweigh the benefits of providing a large number of dwellings in Mid Suffolk, contrary to the NPPF.

In summary the weight of the objections that the Parish Council have received at the public meetings has been enormous. The range of objections against this development include concerns about the impact this amount of development would have on the village, traffic safety, the loss of residential and visual amenity, the wellbeing of all residents, and that it is contrary to local policies and against the wishes of the community. The Parish Council notes that both Stowmarket Town Council and Suffolk County Council Highways are against the development.

The Parish Council feel strongly that developments within Stowupland need to be planned with the residents taking a lead through the Neighbourhood Plan process, not by a predatory developer imposing a large housing estate in an unsuitable location.

Yours sincerely,
On behalf of Stowupland Parish Council

Claire J. Pizzev

Mrs Claire Pizzev
Parish Clerk

From: Michelle Marshall [mailto:Michellelm@stowmarket.org]
Sent: 27 January 2015 11:39
To: Planning Admin
Subject: Planning application 4002/14

Please see comments below from Stowmarket Town Council regarding planning application 4002/14:

The Town Council recommends refusal of the planning application on the following grounds:

i) That the proposed development would have a serious detrimental effect on local services including;

- Education
- Health provision
- Open space, sport and recreational provision
- Library services
- Sewerage and drainage; and

ii) That the proposed development would have a serious detrimental effect on the local road network.

Kind regards,
Michelle

Michelle Marshall
Deputy Town Clerk

Stowmarket Town Council
Milton House | Milton Road South | Stowmarket | Suffolk | IP14 1EZ

01449 612060 | michellelm@stowmarket.org

Planning Application 4002/14

Outline application for residential development of up to 190 dwellings with access, landscape, open space and associated infrastructure. Land between Gipping Road and Church Road, Stowupland

Consultation response from Planning Policy, 5 March 2015

Policy background

Stowupland is classified in the Mid Suffolk Core Strategy (2008) as a Key Service Centre.

The Core Strategy Focused Review (December 2012), in policy FC2, provides for 450 houses on green field sites and 300 on previously developed land, for the Key Service Centre villages, including Stowupland, over a 15 year period. This represents an average provision for at least 45 houses on green field land for each of 10 villages (excluding Bramford and Claydon/Great Blakenham in Ipswich Policy Area).

The Stowmarket Area Action Plan, adopted in February 2013, has assessed housing requirements in the Stowmarket Area and concluded that there was no need for a housing allocation at Stowupland, there being substantial housing sites allocated nearby in the adjacent main town of Stowmarket.

Further policy background is set out in paragraphs 6.54 and 6.55 of the Area Action Plan:

6.54 In response to the consultation received the Council has accepted that at this time there is no need for any planned growth of the Key Service Centres as both villages have already accepted growth in recent years. Subject to funding being made available, affordable housing schemes are capable of being delivered via the existing policy structure in each of the nine villages. Accordingly, for the first five-year period of the plan, no allocations will be made for residential development in the villages of the plan area.

6.55 The Council will therefore expect to determine any planning applications submitted in accordance with the Development Management Policies document, which will apply to village and countryside development. (The saved Mid Suffolk Local Plan [1998] policies will apply for the interim period until this Development Plan Document is produced). To complete the interpretation of policy the Council will maintain the existing Settlement Boundaries previously approved for the purposes of Development Management, on the Proposals Map set out in Appendix F."

Stowupland Parish Council is preparing a Neighbourhood Plan, to consider future housing requirements for the village.

Consultation has started (Issues and Options stage) for the joint Babergh / Mid Suffolk Local Plan. This includes a document considering options for meeting the objectively assessed needs in the area and the options for rural growth, to 2031. It is intended that this will lead to a Core Strategy Focused Review, taking account of the next update of national household projections.

Housing Land Supply

The current Annual Monitoring Report for Babergh and Mid Suffolk estimates that the housing land supply for Mid Suffolk as at 31 March 2014 was 5.5 years, including a 5% "buffer".

The next update for the Annual Monitoring Report will be as at 31 March 2015.

In the applicant's comments regarding the housing land supply situation, they have put forward their own retrospective assessment of objectively assessed need, as at 31 March 2014. They accept that a 5% buffer is appropriate, rather than 20%.

We have carried out an interim update of Mid Suffolk's housing land supply situation as at the end of January 2015.

This indicates that there is no longer a 5 year supply of housing land. It is estimated to be 4.3 years, including a 5% buffer. This would equate to a shortfall of about 300 homes.

Other matters

There are key considerations other than the overall housing land supply situation, including:

- A main concern is the proposed scale of development and its impact on the village of Stowupland. 190 houses would represent about a 20% increase to the existing housing stock of Stowupland, estimated at 920.
- Impact on local character / distinctiveness. The National Planning Policy Framework refers to the desirability of new development making a positive contribution to local character and distinctiveness. The Core Strategy Focused Review policy FC1.1 Mid Suffolk's approach to delivering Sustainable Development includes "Proposals for development must conserve and enhance the local character of different parts of the district".
- Stowupland is not a suburb of Stowmarket and needs to maintain its separate village character.
- The saved 1998 Mid Suffolk Local Plan policy H3 for housing development in villages has been partly overtaken by national policy in the National Planning Policy Framework, but its reference to relating the scale of housing development to its environmental setting remains an important consideration, including " applications for housing development will be considered in relation to the appearance and character of the village, the effect on nearby residential amenity and highway safety, the availability of services and facilities and policies for the protection of visually important open spaces and the surrounding countryside".
- Implications of large scale housing development for local services and infrastructure, including schools.
- Traffic generation.
- Approval of large scale housing development at Stowupland would pre-empt community-led planning through the Neighbourhood Plan for Stowupland, which has recently been designated.

Your Ref: MS/4002/14
Our Ref: 570\CON\3409\14
Date: 20 February 2015
Enquiries to: Colin Bird
Tel: 01473 260400
Email: colin.bird@suffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
Suffolk
IP6 8DL

For the Attention of: Elizabeth Truscott

Dear Elizabeth

TOWN AND COUNTRY PLANNING ACT 1990-CONSULTATION RETURN MS/4002/14

PROPOSAL: Outline application for residential development of up to 190 dwellings with access, landscape, open space and associated infrastructure

LOCATION: Land at, Gipping Road, Stowupland, Stowmarket, Suffolk

ROAD CLASS:

Notice is hereby given that the County Council as Highways Authority recommends that permission be refused for the following reasons:

Further to my previous response dated 27 January 2015 I confirm that the access arrangements, as currently submitted, will result in an increase of traffic on Gipping Road, Thorney Green, Thorney Green Road and Rendall Lane. These roads are unsuitable for extra traffic for the following reasons;

- Lack of footways resulting in pedestrians having to walk in the road along some sections
- High vehicle speeds to the east of the proposed development access where the speed limit is derestricted
- Narrow road widths making it difficult for two vehicles to pass
- Junctions with substandard visibility, such as the junction of Rendall lane and Gipping Road

For the above reasons we recommend that the application be refused in the interest of highway safety.

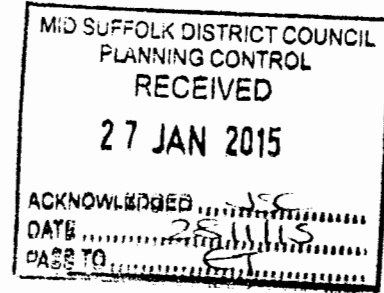
Yours faithfully,

Colin Bird
Development Management Engineer
Highway Network Management Group
Economy, Skills & Environment

Your Ref: MS/4002/14
Our Ref: 570\CON\3409\14
Date: 27 January 2015
Enquiries to: Colin Bird
Tel: 01473 260400
Email: colin.bird@suffolk.gov.uk



The District Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
Suffolk
IP6 8DL



For the Attention of: Elizabeth Truscott

Dear Elizabeth

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/4002/14**

PROPOSAL: Outline application for residential development of up to 190 dwellings with access, landscape, open space and associated infrastructure

LOCATION: Land at, Gipping Road, Stowupland, Stowmarket, Suffolk

ROAD CLASS:

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

The proposed access off Gipping Road will result in additional traffic using Gipping Road and Thorney Green Road which are unsuitable along some sections because of lack of footways, narrow width making it difficult for two vehicles to pass and high speeds to the east of the site. This additional traffic will result in a reduction in highway safety.

The Transport Assessment should consider the option of a single vehicular access off the A1120 Church Road. This would be acceptable provided an emergency access can be provided off Gipping Road with a pedestrian/cycle link.

The proposed new junction on the A1120 should have visibility splays in accordance with the Design Manual for Roads and Bridges of 4.5m x 90m. The splays shown by the applicant are calculated based upon limited speed surveys and do not allow for possible variation of conditions. The radii should be 10.67m to comply with the requirements of a Major Access Road within the Suffolk Design Guide.

The suggested change to the speed limit on Gipping Road (3.1.7) would require a Transport Regulation Order which cannot be guaranteed because of the procedure required for consideration of objections.

At this stage we are still considering any necessary infrastructure improvements which may need to be funded by S106 contributions and will provide a further response with details once this

41

assessment has been completed. We are also awaiting costs from our Rights of Way Team which will be included.

Please find comments from our Travel Plan Officer appended below.

Yours faithfully

Mr Colin Bird
Development Management Engineer
Highway Network Improvement Services
Economy, Skills & Environment

42

Your Ref: MS/4002/14
Our Ref: 570\CON\3409\14
Date: 4 February 2015
Enquiries to: Colin Bird
Tel: 01473 260400
Email: colin.bird@suffolk.gov.uk



The District Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
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Suffolk
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For the Attention of: Elizabeth Truscott

Dear Elizabeth

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/4002/14**

PROPOSAL: Outline application for residential development of up to 190 dwellings
with access, landscape, open space and associated infrastructure

LOCATION: Land at, Gipping Road, Stowupland, Stowmarket, Suffolk

ROAD CLASS:

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

Further to my response dated 27th January the following S106 contributions will be required for transport issues:

1. Rights of Way

As a result of the anticipated increase in use of the Public Rights of Way network and as part of developing the health agenda to encourage people to walk more. This service would be looking for funding to improve and enhance these routes to make them more accessible, especially for people with buggies or mobility aids.

Public Footpath 3 – leads from the development, past Columbyne Hall and links to the Mid Suffolk Footpath; a 20 mile promoted route running from Stowmarket to Hoxne. The route has a natural surface and the section between Gipping Road and Columbyne Hall is very muddy making it difficult to walk along.

An estimate based on average market costs to provide a Limestone type 1 surface: 230m length x 1.5m width = 345m² @ £25m² = £8,625.00

Vegetation clearance – 1 day @ £250.00

Public Footpath 12 – leads from the development to a farm shop/café and to the Mid Suffolk Footpath. The section past Walnut Tree Farm is muddy making it difficult to walk along.

An estimate based on average market costs to provide a Limestone type 1 surface: 220m length x 1.5m width = 330m² @ £25m² = £8,250.00

Public Footpath 39 – leads from the development towards Stowupland Middle School. A section of FP39 has a natural surface which is muddy.

An estimate based on average market costs to provide a Limestone type 1 surface: 100m length x 1.5m width = 150m² @ £25m² = £3,750.00

Public Footpath 49 – leads from the development to Freeman Wood, a community woodland as well as the local schools. The footpath is narrow, with a ditch alongside.

An estimate based on average market costs to provide a Limestone type 1 surface: 100m length x 2m width = 200m² @ £25m² = £5,000.00

Public Footpaths 45 and 46 - Legal costs to improve and resolve alignment issues = £4,000

3 x foot bridges to replace sleeper bridges on FP12 and FP50, inc EA consent = £3,000.00

Officer time @ 12% = £3,945.00

Contingency @ 10% = £3,287.50

The total s106 contribution requested for Rights of Way improvements is **£40,107.50**

2. Travel Plan

Travel Plan Monitoring and Support Fee - **£5000**

Suffolk Car Share Contribution – **£950** (£5 x 190 dwellings)

Travel Plan Implementation and Target Bond - **£157,010**

3. Bus Stop Improvements

Currently the Stowupland to Stowmarket route terminates at Reeds Way/Trinity Walk but could be extended to cover the proposed site. If the site is designed for bus access then we would expect to see a suitable numbers of stops created with equality compliant kerbs, shelters, capability for RTP1 etc.

If this is not the case then we will require **£12,000** for improvements to the nearest bus stops to the north and south of the site to reduce walking distances.

4. Highway Improvements

The applicant needs to demonstrate that a suitable route can be provided for pedestrians, linking the site to the post office at Rendall Lane. Any necessary works within the public highway will be carried out by a Section 278 agreement and funded by the developer.

The footway along the frontage to Church Road is of inadequate width for the additional use resulting from the development. We will require this footway to be widened to 2m as part of a Section 278 agreement.

44

Yours faithfully

Mr Colin Bird
Development Management Engineer
Highway Network Improvement Services
Economy, Skills & Environment

45



Your ref: 4002/14
Our ref: Stowupland – land between Gipping
Road and Church Road 00040673
Date: 06 January 2015
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Ms Elizabeth Truscott,
Planning Services,
Mid Suffolk District Council,
Council Offices,
131 High Street,
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Suffolk, IP6 8DL.

Dear Elizabeth,

Stowupland: land between Gipping Road and Church Road - developer contributions

I refer to the above planning application regarding the erection of up to 190 dwellings at Stowupland. I provided pre-application advice by way of letter dated 08 December 2014.

The development falls within the Stowmarket Area Action Plan (SAAP) and it therefore needs to be considered in relation to SAAP Policy 11.1 and Core Strategy Policy CS6 which requires all development to provide for the supporting infrastructure they necessitate. Mid Suffolk's Core Strategy Focused Review was adopted on 20 December 2012 and contains a number of references to delivering sustainable development including infrastructure e.g. Strategic Objective S06, Policy FC 1 and Policy FC 1.1.

I set out below Suffolk County Council's corporate views, which provides an illustration of possible infrastructure requirements associated with a scheme of up to 190 residential dwellings which need to be considered by Mid Suffolk. 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 national and local policies.

The National Planning Policy Framework (NPPF) sets out in paragraphs 203 – 206 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' which sets out the agreed approach to planning obligations with further information on education and other infrastructure matters in the topic papers. This

can be viewed via the following webpage link <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/planning-and-design-advice/planning-obligations/>

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 at 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.'

We would anticipate the following **minimum** pupil yields from a development of 190 residential units, namely:

- a. Primary school age range, 5-11: 47 pupils. Cost per place is £12,181 (2014/15 costs).
- b. Secondary school age range, 11-16: 34 pupils. Cost per place is £18,355 (2014/15 costs).
- c. Secondary school age range, 16+: 7 pupils. Costs per place is £19,907 (2014/15 costs).

The move from 3 tiers to 2 tiers under School Organisation Review (SOR) will be implemented in the Stowmarket/Stowupland school pyramids from September 2015.

The local catchment schools are Stowupland Freeman CP School, Bacton Middle School (will be closing) and Stowupland High School.

Based on existing forecasts we will have some limited surplus places available at the primary school level (14 places available) but have no surplus places available at the catchment secondary school to accommodate any of the pupils arising from this scheme. **Based on this current position we will require contributions towards providing additional education facilities for the 74 pupils arising, at a total cost of £1,165,392 (2014/15 costs).**

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 2014/15 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 12 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 we would anticipate up to 19 pre-school pupils at a cost of £6,091 per place.

There is 1 early years provider (Stowupland Pre School) in this area offering 52 places and currently there are 5 spaces available. Therefore we would request a capital contribution for 14 places at a cost of £85,274 (2014/15 costs).

- 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 a development brief and/or any 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 Peter Black.

An important element to address is connectivity with the development to services & facilities in Stowupland, such as safe walking/cycling routes to the schools.

A development of this size will require a travel plan (to be secured by a S106 obligation), to include the following:

- Travel Plan Monitoring and Support Fee - £5,000.
- Suffolk Car Share Contribution - £950 (£5 x 190 dwellings).

- Travel Plan Implementation and Target Bond - £157,010 (indicative – workings out can be provided when needed).
5. **Libraries.** The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A contribution of £216 per dwelling is sought i.e. £41,040, which will be spent on enhancing provision at Stowmarket 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 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
 6. **Waste.** The waste disposal facilities topic paper sets out the detailed approach to how contributions are calculated. A contribution of £51 per dwelling is sought i.e. £9,690, which will be spent on enhancing provision in Stowmarket. In addition a waste minimisation and recycling strategy needs to be agreed and implemented by planning conditions. Refer to the Waste Planning Policy Statement and the Suffolk Waste Plan.
 7. **Supported Housing.** Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. We would also encourage all homes to be built to 'Lifetime Homes' standards. Mid Suffolk will liaise with SCC and coordinate this. Refer to the NPPF 'Section 6 Delivering a wide choice of high quality homes'.
 8. **Sustainable Drainage Systems.** It is anticipated that eventually the sustainable drainage provisions within the Flood and Water Management Act 2010 will be implemented, requiring most developments to seek drainage approval from the county council and/or its agent alongside planning consent. At this time, the county council and/or its agent will be expected to adopt and maintain Sustainable Approval Body approved systems for more than one property and a mechanism for funding this ongoing maintenance is expected to be introduced by the Government.

In the interim, developers are urged to utilise sustainable drainage systems (SuDS) wherever possible, with the aim of reducing flood risk to surrounding areas, improving water quality entering rivers and also providing biodiversity and amenity benefits. The National SuDS guidance will be used to determine whether drainage proposals are appropriate. Under certain circumstances the county council may consider adopting SuDS ahead of the currently unknown implementation date and if this is the case would expect the cost of ongoing maintenance to be part of the Section 106 negotiation.
 9. **Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. We would strongly recommend the installation of automatic fire sprinklers. 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 us to make final consultations at the planning stage.

- 10. 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.
- 11. Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs associated with any work on a S106A, whether or not the matter proceeds to completion.
- 12.** The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 Regulations.

Yours sincerely,



Neil McManus BSc (Hons) MRICS
Development Contributions Manager
Economy Skills & Environment

cc Iain Maxwell, Suffolk County Council
 Peter Black, Suffolk County Council
 Jeff Horner, Suffolk County Council



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Co. Reg. No. 5677777

9th February 2015

Dear Madam

Planning Application by Gladman Developments Ltd for Residential Development of 190 Dwellings at Land between Gipping Road and Church Road, Stowupland (Ref: 4002/14) – Consultation Response on behalf of NHS England

We write on behalf of the NHS England: East Anglia Local Area Team (NHSE) in response to your consultation on the above planning application, dated 5th January 2015, and advise that following a review of the applicant's submission, including the Planning Statement, NHSE wishes to raise a "**Holding Objection**" to the application for the reasons outlined below.

Please note that NHSE commissions all healthcare services, incorporating the provision of primary healthcare facilities within its administrative area, including within Suffolk Coastal District.

Background

The proposal is for a residential development of 190 dwellings, which is likely to have a significant impact on the NHS funding programme for the delivery of healthcare provision within the local area, and specifically within the health catchment area of the development. NHSE would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through a Section 106 planning obligation.

Review of Planning Application

The planning application does not include a Healthcare Impact Assessment (HIA) or propose any mitigation of the healthcare impacts arising from the proposed development. An HIA has therefore been prepared by NHSE to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

A GP Catchment Plan to identify the location of the GP practice serving the proposed development is *attached* to this consultation response.

Managing Director:
John Lawson, BA(Hons) MPhil MRTPI

Director
James Lawson, BA(Hons) MA MRTPI

Technical Director:
Georgina Brotherton, BSc(Hons), MSc(Merit), MRTPI

Associate Director:
Sharon Lawson, BA(Hons) DipTP MRTPI

Associate Director:
Aarti O'Leary, BA(Hons) MA MRTPI

Planning Technician:
Natalie Harris, BA(Hons)

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Healthcare Impact Assessment

The Capital Funding Implications of the Proposed Development

The HIA methodology for assessing the healthcare impacts arising from the proposed development includes a capacity calculation for the GP Practices within a 2km catchment of the application site. This is considered to be a reasonable distance to travel to access such services, in line with policy and guidance, which encourages the protection and promotion of local services that are within easy walking distance of housing, replacing short car trips where possible. However, in this instance, there are no surgeries within this catchment, which has therefore been extended to 4km.

Table 1 provides a summary of the capacity position for the catchment GP surgery once the additional staffing and floorspace requirements arising from the proposed development are factored in, including an estimate of the costs of providing new floorspace and/ or related facilities. The costs for additional car parking capacity are not addressed in the table as NHSE has not yet undertaken a detailed audit of the transportation position.

Table 1: Capital Cost Calculation for the Provision of Additional Health Services Arising from the Development Proposal & Developer Contribution

Premises	List Size (Jan 2015)	No. GPs (WTE) ¹	Capacity ²	Spare Capacity ³	Additional Population Growth (190 Dwellings) ⁴	Additional GPs Required to Meet Growth ⁵	Additional Floorspace Required to Meet Growth (m ²) ⁶	Capital Required to Create Additional Floorspace (£) ⁷
Stowhealth Centre, Violet Hill Rd, Stowmarket IP14 1NL	17,861	9	16,200	-1,661	437	0.24	31.2	£62,400
Total	17,861	9	16,200	-1,661	437	0.24	31.2	£62,400

Notes:

1. The number of whole time equivalent GPs based at the practice.
2. Based on the optimum list size of 1,800 patients per GP.
3. Based on current list size.
4. Calculated using the Mid Suffolk District Council average household size of 2.3 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to nearest whole number).
5. Additional growth divided by GP list size capacity (1,800 patients).
6. Based on 130m² per GP as set out in NHS approved business cases incorporating DH guidance within "Health Building Note 11- 01: Facilities for Primary and Community Care Services".
7. Based on standard m² cost multiplier for primary healthcare facilities in the East Anglia Region from the BCIS Q1 2015 Price Index, adjusted for professional fees, fit out and contingencies budget (£2,000/ m²), rounded to nearest £.

As shown in Table 2, a developer contribution of **£62,400** would be required to mitigate the 'capital cost' to the NHS for the provision of additional healthcare services arising directly as a result of the development proposal.

NHSE therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission for the proposed development, in the form of a Section 106 Agreement.

Developer Contribution Required to Meet the Cost of Additional Capital Funding for Health Service Provision Arising

In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework (NPPF) and the CIL Regulations, which provide for developer contributions to be secured to mitigate a development's impact, a financial contribution of £62,400 is sought, which would be payable before the development is first occupied.

NHSE 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 and in Section 122 of the CIL Regulations, which require the obligation to 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.

Conclusion

In conclusion, NHSE raises a holding objection to the proposed development on the grounds that the applicant has not proven that the application fully delivers sustainable development, as it does not assess the likely healthcare impacts of the development or provide for the necessary mitigation.

On this basis, the application is considered to conflict with the provisions of the Development Plan, which seek to achieve sustainable development and provide for the necessary physical and social infrastructure (and funding) to support residential development. Specifically, it is considered to be inconsistent with:

- Objective SO5 and Policy CS6 of the Mid Suffolk Core Strategy (2008); and,
- Strategic Objective SO6 and Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012).

The application is also considered to conflict with the intentions and objectives of national guidance and other material considerations set out in the NPPF (with its presumption in favour of sustainable development). Specifically, it is considered to be inconsistent with Paragraphs 17, 69, 70, 156, 162 and 196 of the NPPF.

Notwithstanding the above, NHSE would be content to lift its objection in the event that an appropriate level of mitigation is proposed by the applicant and secured through a Section 106 Agreement. In this respect, it is considered that a developer contribution of £62,400 would fairly and reasonably address the identified healthcare impacts.

NHSE looks forward to working with the applicant and the District Council to satisfactorily address the issues raised in this letter and would appreciate acknowledgment of its safe receipt.

Yours sincerely

Lawson Planning Partnership Ltd
Consultant to NHS England

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Elizabeth Truscott

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9th February 2015

Cc: NHS England

Encl.

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ENGLISH HERITAGE

EAST OF ENGLAND OFFICE

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Our ref: P00443439

22 January 2015

Dear Ms Truscott

**Notifications under Circular 01/2001, Circular 08/2009 &
T&CP (Development Management Procedure) Order 2010**

**LAND BETWEEN GIPPING ROAD AND CHURCH ROAD, STOWUPLAND,
SUFFOLK**

**Application No 4002/14 - outline application for residential development of up to
190 dwellings with access, landscape, open space and associated
infrastructure.**

Thank you for your letter of 5 January 2015 notifying English Heritage of the above
planning application.

Summary

The application seeks outline consent for a residential development of up to 190 dwellings with access, landscape, open space and associated infrastructure on land between Gipping Road and Church Road. The site lies to the south of Columbine Hall the surviving part of a grade II* listed manor house dating from c.1400 and c.1600. We have concerns that the proposed development would erode the wider rural setting and significance of Columbine Hall.

English Heritage Advice

The Hall is a picturesque house, attractively sited on a moat and constructed with a mixture of vernacular materials including rubble flint walling with a timber framed upper storey and tiled roof. It lies outside the village in a rural setting with a small group of farm buildings and houses to the south. Presumably historically this land supported the manor house and the surviving rural setting is a reminder of how it functioned and contributes to the aesthetic values of the property.

The residential development is proposed as an extension to the eastern side of Stowupland between Gipping and Church Roads. It lies to the south of Columbine Hall, opposite the drive to the Hall which leads off Gipping Road. At present the drive



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*English Heritage 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.*



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ENGLISH HERITAGE

EAST OF ENGLAND OFFICE

lies beyond the edge of the village so a visitor has the sense of having left the settlement and being within the rural landscape which forms the wider setting to the Hall and, as described above, contributes to its significance. The construction of a large residential development on this land would change its character from a rural field to part of the modern village. This would erode the rural setting of the Hall.

The National Planning Policy Framework requires local authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets, paragraph 131. It continues in paragraph 132 by stating that great weight should be given to an asset's conservation and the more important the asset, the greater that weight should be. Where a proposal would result in harm to an asset's significance, this should be weighed against the public benefits, paragraph 134.

The application is for outline consent so full details of the development are not available at this stage. However, the Design and Access Statement illustrative master plan shows the northern half of the site as being the most densely developed with housing along Gipping Road. The site is large and we consider there is scope for some residential development here, but that retaining a green buffer at the northern end would help preserve the setting of Columbine Hall. The size of this buffer should be informed by further analysis of views to the north of the site and the contribution these make to the significance of Columbine Hall. The treatment of the housing on the northern edge should also be designed with this aim in mind. The Heritage Statement accompanying the application reiterates various policy and guidance but provides almost no analysis of how the setting of the Hall contributes to its significance or the impact of the development on this.

Recommendation

We have concerns that the residential development of the northern part of the site would erode the wider rural setting of Columbine Hall causing harm to its significance. If your authority is minded to approve some residential development on the site, it should seek to ensure a green buffer at the northern end of the site, the extent of which should be informed by further analysis, and the appropriate treatment of the northern edge of the housing.

Yours sincerely

Clare Campbell

Principal Inspector of Historic Buildings and Areas

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HERITAGE COMMENTS

Application No.: 4002/14

Proposal: Outline application for residential development of up to 190 dwellings with access, landscape, open space and associated infrastructure.

Address: Land between Gipping Road and Church Road, Stowupland

Date: 02/02/2015

SUMMARY

1. The Heritage Team considers that the proposal would cause
 - Harm to the setting of the adjacent listed building of a less than substantial amount. The main area of impact from the proposed development would be on the setting of the grade II* listed Columbine Hall. The northern end of the development would be immediately opposite the driveway to this significant heritage asset, diluting the rural character of its extended setting. As a result this would cause an element of harm towards the setting of the listed building. Some impact will also be had from the reduction of the division of the village core from the linear isolated designated heritage assets along Church road.
2. The Heritage Team recommends that the application is revised.

DISCUSSION

An outline planning permission application does not provide sufficient information for a full assessment of impact on the setting of the adjacent listed buildings. Comments have been based on the information presented.

Stowupland has increased in size dramatically over the past few decades. The development site is located on the north eastern edge of the village. The proposals for 190 dwellings will fill the gap between the village core and the collection of historic houses further along church road (A1120). It will also create further infill between Church Road and Gipping Road to the North.

There are a number of designated heritage assets that are immediately adjacent to the development site. The assets along Church Road are all grade II listed. The heritage statement identifies that some of these will be unaffected by the development, namely Appleton, Church Road/Pendle Cottage, Church Road and Barn Cottage/Foxglove Barn. This is not accurate and all of the extended settings of the heritage assets and the way they will be appreciated will be affected by the development. As the NPPF details, setting

does not have a fixed boundary and cannot be definitively and permanently described as a spatially bounded area or as lying within a set distance of a heritage asset. The immediate area surrounding these buildings is rural in character with a linear pattern of settlement, detached from the primary village core. A partial green buffer had been provided in the eastern corner of the site directly adjacent the heritage assets. However there are still properties indicated fronting onto Church Road adjacent to the existing village. As a result this reduces the separation between the main village and the linear isolated group of heritage assets. This impact could be reduced further by continuing the green buffer the entire length of Church Road.

There are glimpsed views of the spire of Holy Trinity church mainly from Gipping Road which is across the development site and therefore obscured if development occurs. Views are an important part of the setting of any heritage asset and can contribute to its significance. This view has some significance but the impact on the asset as a result of its loss is negligible as there are several other long range views that will be unaffected after development has taken place.

The extended setting of the grade II* Columbine Hall is affected by these proposals by negative change. The approach driveway and entrance from Gipping road will be opposite the dwellings that will front directly onto Gipping Road. This will change the way the grade II* asset is approached and experienced as its extended setting will be altered from largely rural in character to a semi urban environment. As a result an element of harm will be encountered towards the grade II* listed 14th century hall. This harm can be reduced by adding a green buffer zone to the northern end of the development site to obscure views of the development site on the approach to and from the Hall.

While this is at outline planning permission stage a more detailed assessment is required of the significance of the settings of the heritage assets that are to be affected by this scheme. This should be especially focused on Columbine Hall and the surrounding area.

Name: Mark Wilson
Position: Enabling Officer – Heritage

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk 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.

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Your Ref: 4002/14
Our Ref: Landscape/MSDC/Stowupland
Date: 2nd February 2015

Dear Elizabeth,

Proposal: Outline application for residential development of up to 190 dwellings with access, landscape, open space and associated infrastructure.

Location: Land between Gipping Road and Church Road, Stowupland

Application Number: 4002/14

Thank you for your consultation dated 5th January 2014. Based on the information provided on the MSDC web site, and a site visit carried out on 19th January I offer the following response to this consultation.

I have referred to the Planning Statement, Design and Access Statement, Landscape and Visual Impact Appraisal and Arboricultural Statement. All these documents appear to be comprehensive. I have referred to the Framework plan noting that the Planning Statement refers to this as follows:

'4.2.5 The Framework Plan allows for the majority of existing trees found along the boundaries of the Site to be retained. Open space will be provided throughout the Site to ensure it is accessible by all new and existing residents. The Plan also demonstrates that there will be landscape buffering along the west and eastern boundaries of the Site.'

4.2.6 The Framework Plan illustrates one possible option for the Site, taking account of infrastructure requirements, open space provision, adjoining land uses, Site constraints and the community consultation.

4.3.4 Careful consideration has been given to the provision of public open space within the scheme to ensure that the scheme can be assimilated into the existing landscape and be connected to the existing community. The Site exceeds the policy requirement in terms of

public open space for the area. The location of the formal recreation area is aimed at providing a central 'hub' for new and existing residents to use as well as a section of open space to the south east to provide a buffer to the existing pylon line. Extensive areas of new landscape buffering will also be provided to screen the views of the development from the surrounding residential development in line with recommendations of the Landscape and Visual Impact Appraisal (LVIA).'

The application is in Outline with the Planning Statement referring to the site accommodating up to 190 dwellings with access, landscape, open space and associated infrastructure.

The land is situated on the north east side of the existing village at approximately 53 – 58.5 AOD with the lowest part of the site situated at the site boundary with the school.

The field lies within the Landscape Character Type 3, Ancient Plateau Claylands; the key aspects of the guidelines have been set out in the submitted Landscape and Visual Impact Appraisal (LVIA) on page 11 to 12.

Having considered the application carefully I identify the following main layout and design aspects which will create detrimental landscape impacts.

- **The Scale of development**

This is a significant development area for a village the size of Stowupland, apart from potential issues relating to infrastructure there will be a significant visual impact on the existing settlement and also on the surrounding countryside.

There will be limited separation to the two parts of the development area provided by the central green space. This space will also be dissected by the main access road and be used to accommodate a drainage pond and play space. The road itself will inevitably intrude both physically and visually into the field landscape cutting through the only remaining cross field hedge in this locality.

The development will impact on one of the most sensitive areas of the site, the low lying field (as above) which is framed by the playing fields to the south west and the pond and meadow to the north east. Note Viewpoint 17. The development framework proposed does not reflect the high quality landscape character of this central area albeit this has already been fragmented by past hedgerow removal. Properties proposed at 2 ½ storey will have an impact on this area (ref Para 2.5 LVIA).

The land to the west consisting of playing fields is designated as a Visually Important Open Space (VIOS), the quality of this space and its connection to the wider countryside with views across the landscape from the north east towards the Holy Trinity Church and its steeple should be preserved. The church is Grade II listed building.

The VIOS area is subject to a saved Policy SB3 retaining Visually Important Open Spaces. This policy requires that Visually Important Open Spaces be protected because of their contribution to the character and appearance of their surroundings and their amenity value to the local community. The district will resist development which would have a harmful effect on these identified Visually Important Open Spaces because of their contribution in an undeveloped form to the distinctiveness of their setting, or character, or nearby landscape. The impact on the VIOS does not appear to have been specifically assessed.

- **Prominence in the wider landscape**

The north eastern edge to the development area contains either none or limited hedgerow or trees. There will be virtually no immediate screening afforded to the development area. In addition to this the hedgerows to the east of the site are often fragmented or non-existent allowing clear views from the direction of Walnuts Farm and other properties to the east of the site. Proposals to provide a 20 metre landscape buffer zone will be beneficial but this will take a minimum of 30 years to offer a beneficial visual screen. In the intervening period growth should be visible and attractive but screening benefits will only arise when plant growth achieves bulk and maturity.

- **Visual Impact on Gipping Road**

The visual impact on Gipping Road will be significant with the loss of part of the mature tree belt and hedgerow resulting from a highway access point. There will also be an impact on the visual appearance of the driveway approach to the Grade II* listed Columbine Hall. The creation of a green space area along part of the frontage will help offset the impact to an extent.

The proximity of new housing to the cluster of properties on Gipping Road will result in them becoming absorbed by the estate and losing the current character of a more isolated group. The plot size and gardens to these properties is restricted on their southern aspect making them more vulnerable to visual intrusion.

- **Impact on existing properties in Trinity Walk**

Impacts here will be limited by the protection of a suitable buffer zone to their north east aspect, in addition to most of the properties having good sized rear gardens. The space would protect existing trees and provide space for suitable footway and cycle access routes alongside the whole of this boundary, not only the section indicated between FP 45 and 50.

- **Lighting impacts**

There is likely to be a wide impact from night time light glow on the surrounding landscape where currently night time lighting effects is limited. This lighting impact will effectively bring the sense of developed village into contact with two outlying clusters of houses on Church and Gipping Road. Lighting will also impact on the VIOS areas of the village damaging the link between the dark fields and the wider countryside.

Landscape and visual impact appraisal

A Landscape and Visual Appraisal (LVA) has been carried out by FPCR as part of the application package and dated December 2014. This has been conducted in accordance with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment 3rd Edition. The LVA identifies 29 viewpoints around the site area from which the proposed development site has been specifically assessed.

The impact of street lighting has not been specifically referred to in the assessment of visual effects although some guidance has been given in paragraphs 5.12 – 5.13.

In general terms I consider that the landscape and visual impacts of the proposed development have been under described in the summary table and text.

Visual effects from viewpoints after a ten year period are described as predominantly negligible, some at minor adverse and only one viewpoint (VP 20 adjacent to Waveney) experiencing a Moderate adverse effect. The assessment somewhat underestimates the visual impacts arising from the development. This may be as a result on the optimistic assessment of the ability of new planting in the open spaces and alongside the eastern site boundary to mitigate the visual impacts arising from the development.

Comments on some of the LVIA viewpoints:

VP 1 illustrates the value and character which the A1120 roadside hedge lends to the view. I consider that this must be replaced (advanced planting) as part of the new access to the site.

VP 2 illustrates the importance of ensuring that gaps and glimpses through and over the new development are designed into the development to ensure that some views of the current village open spaces are retained.

VP 3 illustrates the importance of views through to the VIOS and the church steeple. An extended central green space would help to ensure that these views are partially protected. Development will be highly prominent on the foreground and beyond the tree and hedgerow. It is unlikely the development will be 'largely screened from view' as stated, however new planting within the green space corridor will help to assist with screening once mature.

VP 4 There may be an error here with the Residential arrow shown to the fore of the actual development area? Lack of any existing hedgerow on the east boundary of the site means that development will be highly prominent in views such as VP 4-7. Although there are glimpses of existing properties in and beyond Stowupland it is disingenuous to state that development will be viewed within the context of existing properties; implying the view is already of a built area.

VP 5 Illustrates how the lack of effective screening hedgerow and trees will result in the new development being prominent in views from the east and north east.

VP 6 illustrates the lack of hedgerow along much of the length of this path as well as the lack of hedge on east boundary of the site. The development will be highly prominent, the new planting will take several decades to offer any reasonable screening. The 20 metre landscape belt proposed will need to be planted at early stages of development to ensure no time is lost for establishment.

There is also a need and justification for offsite hedgerow and tree planting within the landholding of the applicant/landowner.

VP 7 The development will be prominent (due to lack of intervening vegetation) with the overall effect at Year 10 likely to be greater than stated 'negligible'. The impact in later years will be dependent on the storey heights of buildings and the design and growth rate of the proposed perimeter tree belt.

VP 8 and 9 These viewpoints illustrate the smaller size of the existing houses and highlight the need to ensure that new development does not overwhelm them in terms of scale and density. Views of the church steeple are apparent as are the trees along the hedgerow east of properties in Trinity Walk. The development will block out these views entirely from the Gipping Road direction.

VP 10 illustrates the quality of the lane and the need to ensure that impacts from hedgerow loss and new highway access are sensitively mitigated.

VP 21 there will be a need to clarify the length of hedge which will need to be removed by the new highway access from A1120. This hedge provides some roadside screening at present. The setback proposed for the development area will be beneficial in terms of visual impact.

VP 22 Views of this site from this point are more restricted but as the road rises up the slope to the south views of the site become visible identifying the need to ensure screen planting is accommodated in the Church Road open space.

VP 23 – 26 I have not had chance to check these viewpoints, there are few intervening hedgerows between Pack Farm and the site so views of the site and buildings are likely to be visible.

VP 27 – 30 There will be views from all these viewpoints the clearest being from areas east of the site such as VP27. Unfortunately the area has seen significant hedge and tree removal in past decades and this means that longer views of the site from surrounding roads and footpaths are often available.

Recommendation

I have set out aspects at the start of this letter which set out why the application could be refused. These relate to the impact of the development on the village setting and the wider landscape.

However if MSDC are minded to approve this development I recommend that the following design aspects are considered/discussed in order to seek amendments to the Planning Framework. The landscape proposals described in the LVIA paragraphs 5.3 to 5.9 set out some useful parameters.

- Carry out advance planting along the north east edge of the development area both reinstating hedgerows and adding trees. The site is bounded by intermittent hedgerows and trees but there is scope to enhance these by positive management and new planting. I welcome the illustrative framework plan which appears to show most of the boundaries bordered by private drives, new public footpaths/cycle routes, and other public spaces.
- Consider off-site planting and carry out hedgerow reinstatement of those hedgerows which might help to contain wider views, particularly south and east of the site where they are within the same land ownership. This should be subject to a S106 agreement for off-site planting.

- Create a greater area of natural open space adjacent to the existing playing fields to ensure a more successful visual link between the VIOS area and the wider landscape. Some of the most significant trees and hedges occur in the centre of the site and neighbouring a small adjacent field where the hedge (H10) links the school playing field with the outer boundary.

It would be beneficial to further increase and enhance the greenspace provided here to ensure a good setting for these natural features and allow some views to permeate through the development area. Consider carefully the proposal to incorporate 2 ½ storey buildings in this location Ref 5.10 LVIA.

- Create a green space setting for the cluster of properties on the Gipping Road ensure their setting is protected to a greater degree than indicated.
- The green space indicated and neighbouring the cluster of properties at Church Road, A1120 will help to protect their setting and lend some sense of separation from the proposed new development. However the overhead power line and pylon (south A1120) will exert a strong and detrimental visual impact on new properties. The careful consideration of architectural and landscape design to ensure minimal views from new properties will be essential.
- The Church Road/A1120 frontage hedgerow is likely to be removed by the need for a new highway access and visibility splays, 90m x 4.5m required by SCC Highways. Ensure that this is replaced by a new native species hedge and trees to ensure that the road-scape retains a semi-enclosed appearance (over time). This needs to reflect the character of the roadside as illustrated by Viewpoint 20.
- In order to reduce visual impact on the Church Road roadside tree group (oak, ash, hazel) properties should be set no further forward than the building line formed by the properties of Waveney and Birdwood.
- Ensure that the two SUDS pond areas are easily accessed with properties overlooking the spaces. Proposals described in Para 5.7 LVIA, meadows and planting are welcome but will need adequate space to implement fully.
- Ensure that all parts of the development are linked to foot and cycle way access routes to serve the schools, church and village. Access routes alongside the length of the south west boundary need to be included to feed into the FP50. FP45 links into Trinity Walk but should be continued to meet the north end of the development area and the Gipping Road. This would ensure that the space illustrated is utilised as accessible greenspace and managed accordingly. Ref Para 5.5 LVIA.

In the event that approval of this outline application is forthcoming then the following reserved matters conditions should be considered:

- Development of a master plan including open space/green infrastructure plans. It would be appropriate to develop a master plan approach to the site should planning permission be forthcoming. A master plan will refine the submitted Development Framework and would set out the need to provide further detail on a range of specific design matters.