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Development : 3310/14
Developer site : Great Blakenham
Location : Mid Suffolk District Council

Contact:
Leigh Jenkins
Business Liaison Manager
Suffolk Constabulary
leigh.jenkins@suffolk.pmr.police.uk
01473 762725

Needham Chalks: 3153/14
Impact upon Suffolk Constabulary Police Infrastructure

I am writing on behalf of Suffolk Constabulary (SC) to set out the need for additional policing infrastructure required to service the proposed growth resulting from the Great Blakenham (GB) development of 270 dwellings, which falls within Mid Suffolk District Council (MSDC). My colleagues from Architectural Liaison (Community Safety) will comment separately on 'Secured by Design' matters once a detailed application has been submitted.

The Constabulary, as with other key stakeholders need to evidence their requirements, cannot always expect to receive all that is requested through planning obligations. However, the fact that policing has for too long been omitted from the planning process, unlike Libraries, Education, Health etc, does need to be understood by the Constabulary i.e. how has the evidence submitted by other parties warranted their inclusion for developer contributions, when policing has not?

It is important that from the off the Constabulary states its intent to be robust when ensure that it is considered an equal recipient of developer contributions as other key stakeholders (which have more traditionally been the main recipients of funding through the planning process).

Whilst this paper addresses the impact that the GB site will have on the current level of policing afforded to the community, all parties need to be fully aware that what is being requested through the GB development will contribute to the wider policing needs that will result from other potential developments within MSDC.

Whilst what is being requested through this paper may be perceived as minimal, it is the cumulative of this and other such developments that causes an adverse impact on the current level of policing within an area.

Failure to support policing requirements on small developments like GB will have a cumulative impact on the level of policing that can be afforded to the community. It is therefore imperative that the impact of reduced policing, on the existing and emerging communities in the area of the development, are given the necessary weight within the planning process and that adequate resources are made available through developer contributions.

SC is responsible for delivering services to address community safety, tackle the fear of crime and seek to achieve a reduction in crime. The delivery of growth from new developments within Suffolk on the scale proposed by GB imposes significant additional pressure on SC's infrastructure base, which is critical to the delivery of effective policing and securing safe and sustainable communities.

The Police Service does not receive sufficient funding to cater for new growth related to infrastructure provision. Further, the money received by SC is comparatively low relative to the size of the population in SC's area. Whilst revenue funding is provided by the Home Office and the Council Tax precept, although with a time lag of three-years, capital projects are mostly financed through borrowing.

Borrowing to provide infrastructure has an impact on the delivery of safe and sustainable communities as loans have to be repaid from revenue budgets, the corollary of this is a reduction in the money available to deliver operational policing.

The following sections provide an overview of local policing demand currently and the resources used to policing this, plus an overview of the planning policy and legislation justification for seeking developer contributions towards growth related policing infrastructure. The critical infrastructure needs required to cater for the proposed development will be highlighted.

Developer Contributions towards Policing and Community Safety

The issue of police eligibility for funding through the planning process is covered in greater depth later in '**National Planning Policy Justification for Policing Contributions**' in this paper. However, it is important that from the off the Constabulary states its intent to be robust when ensure that it is considered an equal recipient of developer contributions as other key stakeholders (which have more traditionally been the main recipients of funding through the planning process).

To this end, the Association of Chief Police Officers (ACPO) has sought counsel from a leading QC in the planning arena, Ian Dove QC, as to the police eligibility for funding through the planning process.

The advice given supports the view that the police are qualified for funding through the planning process and eligible for funding that includes vehicles, communications technology, training uniform, ANPR etc.

This assertion is comprehensively evidenced by the following Secretary of State and Planning Inspector decisions, which confirm Section 106 contributions towards policing and in the context of CIL Regulation 122 tests.

- APP/H1840/A/13/2199085 (Secretary of State determination) – 02 July 2014
- APP/F2415/A/12/21833653 (Secretary of State determination) – 17 April 2014
- APP/X2410/A/13/2196938 & APP/X2410/A/13/2196929 (Secretary of State determination) – 08 April 2014
- APP/T2405/A/13/2200867 – 02 January 2014
- APP/T2405/A/13/2193758 – 01 August 2013
- APP/G2435/A/13/2192131 – 30 May 2013
- APP/X2410/A/12/2173673 (Secretary of State determination) – 14 May 2013
- APP/X2410/A/12/2187470 – 15 April 2013
- APP/F2415/A/12/2179844 – 14 February 2013

The most recent Secretary of State decision of 02 July 2014 concerned a development in West Mercia Police geographical area (Wychavon District). The Section 106 agreement included a contribution for police premises, equipment and vehicles, as per the request in the appeal case. Paragraph 19 of the Secretary of State's decision states:

'The Secretary of State has also considered the S106 Planning Agreement in respect of Appeal A submitted by the main parties at the inquiry and, like the Planning Inspector, he is satisfied that the provisions can be considered compliant with CIL Regulation 122 and paragraph 204 of the Framework and that full weight in support of the appeal proposal can therefore be given to the obligations.'

Current levels of local policing demand

Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis and is wholly dependant on a range of facilities for staff and officers to deliver this.

The area of the proposed GB development is policed by the Western BCU, which during 2011/13 dealt with the following average level of incidents and crimes per annum:

- 13,970 per annum average incidents
- 2,729 per annum average crimes

The following tables afford a breakdown of the key crimes/incidents that make this figure, and the impact proposed growth would have. All figures pertain to the growth, and impact, on MSDC and the area of the proposed development.

For the purpose of this paper, growth has been based on 2.4 residents per dwelling.

Mid Suffolk District Council: Existing Demand and Increase (Per 1000 Population, growth of 648 population)

Table one and two show the rise in both crime and incidents, resulting from the proposed development, this information has been broken down to show some of the key areas that would see an increase, as well as the total increase in crime/incidents across MSDC.

Forecasted Increase in Crimes per Annum

Table One

Crime	Three year average crimes	Per 1000 Population	Forecasted Growth Per Annum
VAP (Violence Against Person)	545	5.6	4
Sex	65	0.7	1
Burglary	466	4.8	3
Vehicle	333	3.4	2
Other Theft	722	7.4	5
Criminal Damage	597	6.1	4
All Crime Total	2729	27.9	18

Forecasted Increase in Incidents per Annum

Table Two

Crime	Average 2011/2013	Per 1000 Population	Forecasted Growth Per Annum
ASB	2547	26	17
PSW (Public Safety Welfare)	5187	52.9	34
Crime	2794	28.5	18
Transport	3442	35.1	22
All Incidents Total	38361	285.3	91

Source tables one, two: Crime Input Data and Polaris/STORM

To assist with a better understanding of the impact growth has on crimes/incidents and the cost this generates, **table three** gives an indication of costs that will arise from the types of crimes that make up the total increase that will arise from the proposed growth.

Forecasted Cost per Annum for projected increase in Police Activity

Table Three

Crime	Average Cost per Incident	Cost, As per Forecasted growth, per Annum
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VAP (Violence Against Person)	£3,924	£15,696
Sex	£1,890	£1,890
Burglary	£518	£1,554
Vehicle	£53	£106
Other Theft	£237	£1,185
Criminal Damage	£94	£376

Forecasted Increase in Total Crime per Annum	18	£19,316
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(based on average cost of £1073.09)

Source table Three: Crime Input Data and Polaris/STORM

Need For Developer Contributions

SC are committed to ensuring that where appropriate a development does not have an adverse impact on the current level of policing and community safety that is afforded to those who live and work in Suffolk.

Therefore any funding sought through the planning process is to maintain the existing level of service delivered SC.

It should be understood from the outset that the delivery of policing is not on a town by town or even on a district by district basis. For the purpose of the GB development this would be policed in the first instance by members of the Local Safer Neighborhood Teams (SNT) and Response Teams, with other departments being drawn upon as and when operational requirements need specialist staff i.e. CID, Roads Policing and Firearms Operation Unit, Dogs, Forensic etc.

Staffing Levels

The table enclosed in **Appendix One** shows the additional personnel that will be required to service the proposed development, to maintain the current level of policing enjoyed by MSDC. The various command categories shown in the table below cover the huge range of services that will be called upon at different times, during the lifetime of the GB development, to deliver policing, such as:

- Investigations
- Response policing
- Criminal justice
- Operations planning
- Dogs and firearms
- Special branch
- Forensic services
- Road Policing and Firearms

- Tactical support group
- IT and communications

These services and others in turn require organisational support functions, based predominantly at Martlesham Headquarters and Landmark House, in order to operate such as:

- Finance
- Human resources
- Training
- Top level management

Staffing levels are under constant review to ensure that minimum acceptable numbers are deployed to meet existing levels of policing demand. This has the benefit of saving costs, but as a result there is no additional capacity to extend existing staffing to cover new developments and the increase in population.

SC will seek to deploy additional staffing and infrastructure to a new development at the same level as is delivered to existing communities policed by SC. It would be complacent not to do this because additional pressure will be put on existing staff and infrastructures, which will seriously undermine the ability to meet the policing needs of a new development and maintain the current level of policing.

In view of the size of the proposed development, an increase in the existing police estate would be required to accommodate the additional staff and custom resulting from the proposed GB development.

This additional requirement, when combined with the existing staff policing the area in question, would act as a tipping point for the current facility used to house staff policing the area that incorporates the GB development. Therefore, the capacity requested for the GB development reflects the housing of these posts (**see Appendix Two**).

Resource Funding, Three-Year Funding Gap

The main funding streams for the Police and Crime Commissioner (PCC) are based on the Governments Three-year revenue and capital settlement.

This formula is used by the Government to calculate grants payable to the PCC is based on four components - relative needs relative resources, a central allocation and damping. The population numbers are drawn from census information and projections made by the Office of National Statistics (ONS).

Projections are for three-year periods, much depends on the speed at which census data is introduced into the funding formula and the accuracy of the ONS projections, inevitably this will not reflect on the immediate need for additional posts that need funding as a result of a new development.

Therefore the three-year funding period for the newly established post reflects the time it will take, until the funding formula reflects the increase in the components that calculate funding.

Requirements, which directly arising from the Great Blakenham development: Information provided so far clearly evidences that the proposed growth, and forecasted incidents and crimes resulting from this growth, will require additional resources to be focused on the area of development (see **Tables one, two and three**). This in turn generates the following infrastructure requirements, to ensure that the current level of policing afforded to the local community is not adversely impacted upon.

Personal equipment for staff – Comprising workstations, radios, protective equipment, uniforms and bespoke training in the use of these. In general we retain this equipment when existing staff leave and are replaced. However, additional staff will require additional equipment. There are practical limits to the extent to which existing equipment can be re-used e.g. with uniforms or where technology has moved on.

Based on the staffing requirements for the GB development shown in **Appendix One**, the set-up costs for new officers/staff would be **£12,744**.

PCSO Funding - Having considered the findings shown in **Appendix One** SC have calculated that should the GB development be granted planning permission, then funding for one Police Community Support Officers (PCSOs) would be viewed as an adequate developer contribution towards community policing and the additional staffing needs required to police the GB site.

The Constabulary has taken into consideration that PCSOs would be more appropriate for the development, as these can be ring-fenced to the development area and not abstracted from their area of work.

The cost of funding one posts, for a three-year term, would be **£80,409**. The funding of PCSO post is something that SC has sought, and gained, through previous developments in the County.

It should be noted that the services provided by the PCSO posts would be overlaid with additional resources dealing with Response, CID, Traffic, Air Support and Contact and Control Room etc.

The funding for these posts would be sought at key stages within the build programme, payment being triggered by the number of dwellings built or other key milestones.

Police vehicles – These will be of varying types and functions covering existing patterns of development and community demand. Vehicles are used by officers and staff on patrol, deployed to deal with emergency responses and for follow-up of recorded crimes e.g. by Scene of Crimes Officers. There is no capacity with the current fleet to meet increased demand resulting from the NC development.

Based on the additional staffing requirements shown in **Appendix One**, and the current ratio of fleet used by SC, see **Appendix Three**, the increase in vehicles required to maintain the current ratio, and the set-up costs for these vehicles, would be one vehicles at a cost of **£20,750**.

Automatic Number Plate Recognition (ANPR) Cameras – ANPR is a proven crime fighting tool which is used by SC in the MSDC area. Police-monitored ANPR has lead to thousands of arrests in Suffolk and been involved in the detection of countless crimes. The new development should benefit from the same technology as elsewhere in Suffolk.

Crime levels are mitigated with this technology in place. Without ANPR, crime levels will rise and detection will become much more resource consuming. This is because whilst crime levels in the area are relatively low, the development will unfortunately be a draw to criminals regionally and nationally. Police monitored ANPR, if it is put in place, will be an effective tool in preventing and combating crime.

Initial work conducted has suggested that a development of the size and nature of the GB development would warrant one ANPR points at strategic locations to the new development, the costs for these sites and associated costs would be £60,073.

Safer Neighbourhood Team (SNT) Police Office – Day-to-day policing services to the NC development and its surrounds are currently delivered from Needham with other police services being delivered from Headquarters at Martlesham and Landmark House. These operate on the basis that there is no policing demand from the proposed area site for the GB development, which is currently unoccupied and places no demand on SC.

There is no reason to doubt that there will be a corresponding increase in crime and demand from new residents, occupiers and visitors to the GB development as that currently made by the surrounding area and across the wider MSDC area (see **tables one, two and three**).

It will consequently be necessary to accommodate the additional staff who will deliver the policing to the GB development. Whilst officers spend time away from base they are not independent and require a start and finish location, storage, briefing and report writing facilities. Our current facilities cannot accommodate the additional staff required as a direct result of the proposed development.

As previously raised, the new staff required to police the NC development, when combined with existing staff, would act as a tipping point for the current facility used to house staff policing the area that incorporates the NC development. Therefore, the additional estates capacity requested will facilitate this (see **Appendix Two**).

National Planning Policy Justifications for a Policing Contribution

The police are a regular and constant participant in the statutory planning process evidencing the impact of growth through work with all our local councils in their plan making, preparation of guidance, preparation for the Community Infrastructure Levy (CIL) and the consideration of individual planning applications.

Nationally, the Association of Chief police Officers encourage Forces to use the planning process as an approach to offset the impact of growth on the police service.

The National Planning Policy Framework (NPPF) establishes a presumption in favour of sustainable development at paragraph 7 which has three dimensions: economic, social and environmental. The economic role of sustainable development emphasises the importance of coordinating the delivering of growth and infrastructure, whilst the social role seeks to achieve accessible local services that support a community's health, social and cultural wellbeing.

The above is further confirmed at paragraphs 17 and 70 of the NPPF, which state that securing sufficient community facilities and services that communities need is a core planning principle.

With regard to promoting healthy communities, paragraph 69 of the NPPF advises that planning policies and decisions should aim to achieve: ***“Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.”***

Paragraph 156 confirms that plan policies should deliver the provision of security and other local facilities. Plan policy and decision making should be seamless according to paragraph 186. Further, infrastructure planning should accompany development planning by local planning authorities (LPAs), as required by paragraph 177, who should in turn work with infrastructure providers (paragraph 162).

Within this policy context, the delivery of policing infrastructure is essential to ensure the delivery of sustainable communities and must be taken into account in considering planning application.

Conclusion

Summary of Contribution Requested

Recruitment and equipping of staff	£ 12,744
One PCSO (three-year funding)	£ 80,409
Police vehicle	£ 20,750
ANPR	£ 60,073
Premises (contribution towards)	£ 36,000
Total	£ 209,976

Without the necessary contribution the GB development will be unacceptable in planning terms. The lack of capacity in existing SC infrastructure to accommodate the population growth and associated demands occasioned by the development means that it is necessary for the developer of the site to provide the contribution that has been set out in this paper, and so ensure the proposed growth does not have an adverse impact on the level of policing and community safety enjoyed by the existing population that is policed by SC.

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SC would welcome the opportunity to meet and discuss the requested developer contributions towards policing in view of the GB development. In the meantime, should you have any queries, please do not hesitate to contact the SC lead for this area of work:

Leigh Jenkins
Business Liaison Manager
01473 782725
Leigh.jenkins@suffolk.pnn.police.uk

“Without prejudice to any other obligation imposed upon it, it shall be the duty of each local authority to exercise its various functions with due regard to the likely effect of those functions on, and the need to do all that it reasonably can, to prevent crime and disorder in its area: Section 17(1) of the Crime and Disorder Act 1998.”

Appendix One

The following table shows the current staffing levels for MSDC based on a population of 97,973, the area of the proposed GB development.

Staff Type	Current Staffing Level	Increased Staffing Level (NC growth of 648 population)
SNT Officers	14	0.09
SNT PCSOs	18	0.12
Response Officers	37	0.24
Other Officers Prorated (inc CID and other specialist teams)	51	0.34
Police Staff for MSDC Suffolk Pro rated	101	0.67

Officers and Staff Set-up Costs

Additional Officers	Approx Set-up Cost per Officer	Pro rata requirement for 1 officers
Recruitment	£1,060	£1,060
Training	£4,400	£4,400
Uniform & Personal equipment	£940	£940
Standard equipment (ICT and furniture)	£1,642	£1,642
Total costs	£8,042	£8,042

Additional central support services	Approx Set up cost per member of staff	Pro rata requirement for 1 staff
Recruitment	£1,060	£1,060
Standard equipment (ICT and furniture)	£1,642	£1,642
Total costs	£2,702	£2,702

Source of tables shown in Appendix One: SC Finance/HR and ICT

The costs shown above are reflective of the costs as at the time of this paper being submitted, these are however subject to change and will be recalculated at the point of planning permission being submitted.

Appendix Two

The GB development will require two additional members of staff. SC Estates allows for six SQ M per member of staff plus 20 percent additional for circulation space, mean a total requirement of 14.4 SQ M

One SQ M is based on an all-inclusive build cost of £2,500 per SQ M, which equates to a total build cost of **£36,000** (this cost assumes that land is supplied as part of the 106 agreement).

It may be that additional floor space required will be added to existing SC estate, in which case the build cost of £2,500 per Sqm will be used as guidance. As with all facets of this paper, SC would be willing to discuss options with the developer.

Appendix Three

Cost of Vehicles

The current vehicle fleet ratio is 2.4 officers to 1 vehicle, as previously mentioned there is no spare capacity within the existing fleet to absorb the additional needs of posts that will be required to police the additional activity resulting from the GB development.

Vehicle costs have been capitalised on 5 year lifetime average costs for a low/medium size equipped vehicle (excluding fuel).

On the basis of an additional 2 staff in the territorial policing and protective services, it is calculated that there will be a requirement for an additional 1 vehicles.

Additional vehicles and bicycles	Cost per Vehicle	Total cost for planned growth
1 vehicle (inc livery and emergency equipment)	£20,750	£20,750
Total cost		£20,750

The costs shown above are reflective of the costs as at the time of this paper being submitted, these are however subject to change and will be recalculated at the point of planning permission being submitted.

From: Jenkins, Leigh
Sent: 26 February 2015 11:05
To: Michelle Lyon
Subject: Police Contributions : 3310/14

Michelle,

I have re visited the figures for the proposed development, based on population growth that includes dwellings built and those proposed in the next stage, and you'll see that this would still necessitate the funding for a PCSO (even when considering that a PC was funded in the first phase). The Constabulary has sought to reduce costs by requesting funding for a PCSO, and not an police officer, reducing costs by around £50,000.

The justification for ANPR and a vehicle are increased, as a result of the premises on site no longer being sought (with staff working from the Needham, and travelling into the area of the development).

From our conversation it's appreciated that funding from the site for developer contributions will not facilitate all requests, that those applying for funding will need to revise the level of funding being applied for. The Constabulary is more than happy to meet with SCDC and discuss how policing and community safety needs can be addressed in the most cost effective manner.

The following table shows the current staffing levels for MSDC based on a population of 97,973, the area of the proposed GB development.

Staff Type	Current Staffing Level	Increased Staffing Level (NC growth of 1,037 population)
SNT Officers	14	0.15
SNT PCSOs	18	0.19
Response Officers	37	0.39
Other Officers Prorated (inc CID and other specialist teams)	51	0.53
Police Staff for MSDC Suffolk Pro rated	101	1.07

Officers and Staff Set-up Costs

Additional Officers	Approx Set-up Cost per Officer	Pro rata requirement for 1 officers
Recruitment	£1,060	£1,060
Training	£4,400	£4,400
Uniform & Personal equipment	£940	£940

Standard equipment (ICT and furniture)	£1,642	£1,642
Total costs	£8,042	£8,042

Additional central support services	Approx Set up cost per member of staff	Pro rata requirement for 1 staff
Recruitment	£1,060	£1,060
Standard equipment (ICT and furniture)	£1,642	£1,642
Total costs	£2,702	£2,702

Source of tables shown in Appendix One: SC Finance/HR and ICT

The costs shown above are reflective of the costs as at the time of this paper being submitted, these are however subject to change and will be recalculated at the point of planning permission being submitted.

Happy to discuss anything raised in the above, or additional requirements.

Regards,

Leigh Jenkins
Business Liaison Manager

Finance Department
Suffolk Constabulary
Police Headquarters, Martlesham Heath
Ipswich, Suffolk, IP5 3QS

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Michelle Lyon
Planning Officer
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk IP6 8DL

20 November 2014

Our Ref: E/CM/2014/35313/S

Dear Michelle,

App Ref: 3310/14
Site: Land Between Gipping and Bramford Road, Great Blakenham, Suffolk
Proposal: Erection of 270 dwellings and associated garaging/car parking, landscaping, public open space etc.

Thank you for consulting Sport England on the above application.

It is understood that the site forms part of, or constitutes a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No. 2184), in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that is allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.

Sport England has therefore considered the application in the light of its playing fields policy. The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. The policy states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies.”

Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport



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England have recognised the importance of such activities to the social and economic well-being of the country.

The proposal relates to the construction of 270 dwellings as part of the wider Great Blakenham development area, which was granted outline planning consent by the Secretary of State in 2008. A previous reserved matters application was originally approved in 2010.

The consultation with Sport England is statutory because the application site includes the private sports ground in the south-west corner. This site covers an area of 2.98 hectares and usually contains 2/3 football pitches and a bowling green. However, the application itself does not impact on this part of the site, with housing only proposed within the former cement works site to the east of the sports ground. The highway improvements required should the Snoasis development progress (new roundabout) which would affect the sports ground are not required for this residential development only proposal.

Sport England are therefore satisfied that with regard to our playing fields policy the proposal meets exception E3 in that the development only affects land incapable of forming a playing pitch or part thereof and does not adversely affect existing pitch provision on the site.

This being the case, Sport England **does not wish to raise an objection** to this application with regard to our statutory remit (protection of playing fields), nor do we wish to recommend any conditions to be imposed should planning consent be granted.

On a non-statutory basis, it is noted that the draft s106 heads of terms includes a £600,000 contribution to sports facilities, as required under the original outline consent. This money was originally proposed to be used on the sports ground referred to above, including enhancements required as a result of the roundabout.

Given there is no current need for the roundabout, I understand MSDC are considering widening the scope of the potential beneficiaries of the £600,000 s106 contributions for outdoor sport, to potentially be used on quantitative or qualitative improvements to other sites in the locality that would be expected to serve the residents of the new housing development. Sport England would support this approach provided it is used to enhance a facility that would serve residents of the new development site.

We understand that Mid Suffolk and Babergh District Councils are planning to carry out a joint playing pitch strategy which may help to identify priority projects on which this money could be spent to best meet new and existing residents in the area.

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Sport England would also welcome further consultation in due course on the proposed strategy for spending this contribution on outdoor sport.

I hope these comments are helpful in the consideration of this application.

The absence of an objection to this application in the context of the Town and Country Planning Acts, does not in any way commit Sport England's or any National Governing Body of Sport's support for any related application for grant funding.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact the undersigned at the address below.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip Raiswell'.

Philip Raiswell
Planning Manager
Tel. 0207 273 1824
Email: Philip.raiswell@sportengland.org

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3310/14



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Michelle Lyon
Planning Officer
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk IP6 8DL

20 November 2014

Our Ref: E/CM/2014/35313/S

TH
26/11/14 ML

Dear Michelle,

App Ref: 3310/14
Site: Land Between Gipping and Bramford Road, Great Blakenham, Suffolk
Proposal: Erection of 270 dwellings and associated garaging/car parking, landscaping, public open space etc.

Thank you for consulting Sport England on the above application.

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Sport England has therefore considered the application in the light of its playing fields policy. The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. The policy states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies.”

Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport





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The consultation with Sport England is statutory because the application site includes the private sports ground in the south-west corner. This site covers an area of 2.98 hectares and usually contains 2/3 football pitches and a bowling green. However, the application itself does not impact on this part of the site, with housing only proposed within the former cement works site to the east of the sports ground. The highway improvements required should the Snoasis development progress (new roundabout) which would affect the sports ground are not required for this residential development only proposal.

Sport England are therefore satisfied that with regard to our playing fields policy the proposal meets exception E3 in that the development only affects land incapable of forming a playing pitch or part thereof and does not adversely affect existing pitch provision on the site.

This being the case, Sport England **does not wish to raise an objection** to this application with regard to our statutory remit (protection of playing fields), nor do we wish to recommend any conditions to be imposed should planning consent be granted.

On a non-statutory basis, it is noted that the draft s106 heads of terms includes a £600,000 contribution to sports facilities, as required under the original outline consent. This money was originally proposed to be used on the sports ground referred to above, including enhancements required as a result of the roundabout.

Given there is no current need for the roundabout, I understand MSDC are considering widening the scope of the potential beneficiaries of the £600,000 s106 contributions for outdoor sport, to potentially be used on quantitative or qualitative improvements to other sites in the locality that would be expected to serve the residents of the new housing development. Sport England would support this approach provided it is used to enhance a facility that would serve residents of the new development site.

We understand that Mid Suffolk and Babergh District Councils are planning to carry out a joint playing pitch strategy which may help to identify priority projects on which this money could be spent to best meet new and existing residents in the area.



**SPORT
ENGLAND**

Creating a sporting habit for life

Sport England would also welcome further consultation in due course on the proposed strategy for spending this contribution on outdoor sport.

I hope these comments are helpful in the consideration of this application.

The absence of an objection to this application in the context of the Town and Country Planning Acts, does not in any way commit Sport England's or any National Governing Body of Sport's support for any related application for grant funding.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact the undersigned at the address below.

Yours sincerely,



Philip Raiswell
Planning Manager
Tel. 0207 273 1824
Email: Philip.raiswell@sportengland.org

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From: Stamp Elliot [<mailto:Elliot.Stamp@networkrail.co.uk>]
Sent: 15 December 2014 13:32
To: Michelle Lyon
Subject: Network Rail Consultation - 3310/14

Dear Michelle,

Thank you very much for consulting with Network Rail in regards to planning application 3310/14.

Following a more detailed review of the proposal and site history, I can confirm that Network Rail has no objection to the proposed planning application.

Network Rail would like to make the council aware of issues regarding the proposed / implemented footway / cycle way improvements on Gipping Road. The footway / cycle way run up to the level crossing on the west side of the tracks and then stop at the crossing. There are no improvements (footway / cycle way) on the eastern side of the crossing. Network Rail plan to raise this issue with Suffolk County Council at the next Road/Rail Partnership.

Thank you

Kind Regards



Elliot Stamp
Town Planner
1 Eversholt Street
London, NW1 2DN
Internal - 085 77247
External - 0207 9047247
Mobile - 07740 224772
Elliot.stamp@networkrail.co.uk

www.networkrail.co.uk/property
Please send all Notifications and Consultations to TownPlanningSE@networkrail.co.uk or by post to Network Rail, Town Planning, 5th Floor, 1 Eversholt Street, London, NW1 2DN

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Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587,
registered office Kings Place, 90 York Way London N1 9AG

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From: Stamp Elliot
Sent: 03 December 2014 15:39
To: Michelle Lyon
Subject: Network Rail Consultation - 3310/14

Dear Michelle,

Thank you very much for consulting with Network Rail in regards to planning application 3310/14.

Network Rail's Claydon level crossing is located in close proximity to the proposed development site. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail and railway crossings are of a particular interest in relation to safety.

The proposed 270 dwelling development is likely to generate an increase in the number of vehicles and pedestrians using the crossing. This increase in usage will lead to an increase in risk at the crossing.

Network Rail's local level crossing manager has explained that the development which has already been completed in the area has caused issues at the crossing. Elderly people walking over the crossing very slowly affects the operation of the crossing and leads to extended barrier down times. Extended barrier down times result in more disruption to the local community.

The increase in traffic using the crossing generated from the proposed development may increase the likelihood of a blocking back incidents occurring. Blocking back incidents can occur when vehicles traverse the crossing in a western direction and turn right into the scrap yard. This movement can cause vehicles to block back over the crossing. As a result vehicles may become stuck across the level crossing causing safety issues.

Network Rail is keen to further discuss the issues detailed above and opportunities to improve safety at the crossing with the developer and council. Perhaps a meeting could be arranged in order to discuss this situation further?

Thank you

Kind Regards



Elliot Stamp
Town Planner

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Date: 21 November 2014
Our ref: 136605
Your ref: 3310/14



Michelle Lyon
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich
IP6 8DL

Sustainable Development
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Ms Lyon

Planning consultation: Erection of 270 dwellings comprising 110 x two-bedroom houses, 131 x 3 bedroom houses and 29 x 4 bedroom houses and associated garaging/car parking, landscaping, public open space, play areas and access to Bramford Road, together with the construction of a convenience store with 6 x two-bedroom flats above, associated parking and servicing areas on land at Hackneys Corner.

Location: Land Between Gipping & Bramford Road, Great Blakenham

Thank you for your consultation on the above dated 03 November 2014 which was received by Natural England on 03 November 2014.

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.

The Wildlife and Countryside Act 1981 (as amended)
The Conservation of Habitats and Species Regulations 2010 (as amended)

Natural England's comments in relation to this application are provided in the following sections.

Statutory nature conservation sites – no objection

This application is in close proximity to the Little Blakenham Pit, Great Blakenham Pit and Sandy Lane Pit, Barham Sites of Special Scientific Interest (SSSI).

Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which these sites have been notified. We therefore advise your authority that these SSSI do not represent a constraint in determining this application. Should the details of this application change, Natural England draws your attention to Section 28(1) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.

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 is needed (which is the developer's responsibility) or 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.

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Biodiversity enhancements

This application may provide 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 National Planning Policy Framework. 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'*.

Landscape enhancements

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Impact Risk Zones for Sites of Special Scientific Interest

Natural England has recently published a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs). This helpful GIS tool can be used by LPAs and developers to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. Further information and guidance on how to access and use the IRZs is available on the [Natural England website](#).

We would be happy to comment further should the need arise but if in the meantime you have any

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queries please do not hesitate to contact us.

For any queries regarding this letter, for 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

Hannah Bottomley
Sustainable Development Consultation Team

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LAWSON PLANNING PARTNERSHIP Ltd



Michelle Lyon
Consultant Senior Planning Officer -
Development Management
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8 DL

aartiolary@lpppartnership.co.uk

Tel 01206 835150

Co. Reg. No. 5677777

6th June 2014

Dear Madam

Revised Proposal for Residential Development (426 Dwellings) at Former Masons Cement Works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham – Pre-Application Advice on Behalf of NHS England

Lawson Planning Partnership Ltd (LPP) has been instructed by NHS England to prepare pre-application advice on the likely healthcare infrastructure and funding implications linked to the revised proposals for residential development of the above site.

Please note that NHS England is responsible for commissioning all healthcare services, including the provision of primary healthcare facilities within their administrative areas, including within Mid Suffolk District.

Background

It is understood that the revised proposals comprise a total of 426 dwellings, involving 156 dwellings approved as part of planning permission reference 2326/05 and a further 270 dwellings. This scale of development has the potential 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 of the development, which would require appropriate mitigation.

An executed Section 106 Agreement linked to planning permission reference 2326/05 included covenants relating to phased payment of financial contributions towards increasing capacity at Needham Market Country Practice. An extract of the relevant S106 terms are *attached* at Appendix 1 to this letter.

We understand that, to date, 2 of the 3 financial contributions have been paid by the developer to the Council and are to be transferred to NHS England in due course.

We also understand that the developer and the Council now wish to revisit the healthcare infrastructure and funding requirements arising from the proposed development in light of viability

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

Planner:
Natalie Garrish, BA(Hons) DipLaw/CPE

Consultant:
Rod Lay, Dip EP CP Cert UD MRTPI

882 The Crescent, Colchester
Business Park, Colchester, Essex,
CO4 9YQ
www.lpppartnership.co.uk

concerns. A Healthcare Impact Assessment (HIA) has, therefore, been prepared to determine the level of developer contribution towards capital funding that is likely to be required to increase capacity within the catchment GP Practice.

The calculations below reflect the latest information on GP list sizes and the number of whole time equivalent GPs at the surgery. This information may need to be updated at such a time as proposals for the site's development are progressed, to ensure that the most up to date healthcare baseline and context is used to assess the scheme's impact.

Healthcare Impact Assessment

Determining the Population Arising

The calculations used to determine the likely new population arising are set out in Table 1 below.

Table 1: Population Arising from Proposed Development

New Unit Type	No. Units Proposed ²	Occupancy ²	New Population
Released Plots			
2 bed house	41	1.8	73.8
3 bed house	43	2.6	111.8
4 bed house	31	3.2	99.2
1 bed flat	14	1.3	18.2
2 bed flat	27	1.8	48.6
Sub Total 1	156		351.6
Revised Scheme			
2 bed house	107	1.8	192.6
3 bed house	145	2.6	377
4 bed house	18	3.2	57.6
Sub Total 2	270		627.2
Overall Total	426		979

Notes:

1. Taken from accommodation schedule.
2. Occupancy assumptions based on the averages for England (2004-2007) as set out in the "Household size by type of accommodation and by number of bedrooms" Table within the DCLG Survey of English Housing.
3. Rounded to nearest whole number.

The Capital Funding Implications of the Proposed Development

Table 2 provides a summary of the capacity position for the GP Catchment Practice once the additional staffing and floorspace requirements arising from the development proposal are factored in, including an estimate of the costs for providing new floorspace and/ or related facilities. The costs for additional car parking capacity are not addressed in the table as NHS England has yet to undertake a detailed audit of the transportation position.

A GP Catchment Plan to identify the location of the GP Practice serving the development proposal is *attached* to this letter.

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

Premises	List Size (01.04.14)	GP WTE ¹	Capacity ²	Spare Capacity ³	Additional Population Growth (426 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
Barham & Claydon Surgery, Norwich Road, IP6 0DJ	1,658	0.75	1,350	-308	979	0.54	70.2	£140,400
Total	1,658	0.75	1,350	-308	979	0.54	70.2	£140,400

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. Taken from Table 1 above.
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 2014 Price Index, adjusted for professional fees, fit out and contingencies budget (£2,000/ m²), rounded to nearest £.

As shown in Table 1, there is a patient list size capacity deficit at the catchment GP surgery. The HIA indicates that a developer contribution of **£140,400** would be required to mitigate the capital cost to the NHS for the provision of additional health services arising directly as a result of the development proposal.

Taking into consideration the developer's payment of 2 financial contributions to the Council in association with planning permission reference 2326/05 (totalling £80,000), and on the understanding that these contributions are to be transferred to NHS England in due course, a residual contribution of **£60,400** would be required to mitigate the capital cost to the NHS for the provision of health services arising directly as a result of the revised proposals.

Conclusion

An HIA has been undertaken to inform the likely developer contributions required to mitigate the healthcare impacts arising from the revised proposals for residential redevelopment of the Former Masons Cement Works and adjoining Ministry of Defence Land, Gipping Road, Great Blakenham. This assessment is based on a development comprising 426 dwellings, the latest information on GP list sizes and the current number of whole time equivalent GPs at the catchment surgery.

On this basis, the assessment indicates that a residual developer contribution of £60,400 is required to mitigate the 'capital cost' to the NHS for the provision of additional healthcare services arising directly as a result of the revised development proposal, taking into consideration contributions that have already been paid by the developer to the Council.

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Michelle Lyon

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6th June 2014

This necessary healthcare mitigation should be included as a Section 106 Head of Term of Agreement in association with the proposals, to be secured as part of a planning obligation linked to any subsequent planning permission and payable prior to occupation of the development.

Finally, depending on the programme for this development proposal, it should be noted that the calculations within this assessment may need to be revised to reflect the most current information on existing healthcare provision, or should the proposals be varied.

NHS England expects to be consulted on the planning application, in due course, so that the healthcare position and requirements can be restated, and updated as necessary.

Yours sincerely

Lawson Planning Partnership Ltd

Cc: Philip Isbell, Mid Suffolk District Council
Andrea Patman, NHS England

Appendix 1 – Extract from Section 106 Agreement for Permission Ref: 2326/05

“Healthcare Contribution”

the sum of One Hundred Thousand Nine Hundred and Twenty Three Pounds (£100,923) payable in three payments of Thirty Thousand Pounds (£30,000) BCIS Indexed (“the First Healthcare Contribution”) pursuant to paragraph 4.1 of the Second Schedule and the sum of Fifty Thousand Pounds (£50,000) BCIS Indexed (“the Second Healthcare Contribution”) pursuant to paragraph 4.2 of the Second Schedule and the sum of Twenty Thousand Nine Hundred and Twenty Three Pounds (£20,923) BCIS Indexed (“the Third Healthcare Contribution”) pursuant to paragraph 4.3 of the Second Schedule in each case to be spent by the Council to support an increase in the capacity of general practitioners and other services at the Needham Market

Country Practice

“Needham Market Country Practice”

the existing general practitioners’ practice situated on Barking Road Needham Market

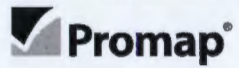
4 HEALTHCARE CONTRIBUTION

- 4.1 Prior to the Occupation of more than ten (10) Dwellings in Phase One the Owner shall pay the First Healthcare Contribution to the Council and such payment shall be used by the Council to support an increase in the capacity of general practitioners and other medical services at the Needham Market Country Practice
- 4.2 Prior to the Occupation of more than fifty (50) Dwellings in Phase One the Owner shall pay the Second Healthcare Contribution to the Council and such payment shall be used by the Council to support an increase in the capacity of general practitioners and other medical services at the Needham Market Country Practice
- 4.3 Prior to the Occupation of more than fifty (50) Dwellings in Phase Two the Owner shall pay the Third Healthcare Contribution to the Council and such payment shall be used by the Council to support an increase in the capacity of general practitioners and other medical services at the Needham Market Country Practice

Former Masons Cement works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham
Pre-Application Advice on Behalf of NHS England
GP Catchment Area Plan (June 2014)



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From: Aarti OLeary [<mailto:Aarti@lppartnership.co.uk>]
Sent: 11 December 2014 11:30
To: Michelle Lyon
Cc: Philip Isbell; James Lawson
Subject: Land Between Gipping & Bramford Road, Great Blakenham (Ref: 3310/14) - Consultation Response on behalf of NHS England

Michelle,

Please find attached a consultation response to the above planning application submitted on behalf of NHS England.

We would be grateful if you could confirm its safe receipt.

In addition, we have been advised by NHS England that Needham Market Country Practice has submitted a proposal for expenditure of the £80,000 healthcare contribution awaiting transfer to NHS England.

Once we have received the accounting details to allow the transfer of the contribution, we shall forward these to you along with a copy of the proposal.

Regards

Mrs Aarti O'Leary BSc (Hons), MA (Merit), MRTPI
Consultant to NHS England

Lawson Planning Partnership Ltd
882 The Crescent
Colchester Business Park
Colchester
CO4 9YQ

aarti@lppartnership.co.uk
Tel. 01206 835 150
Mobile: 07793 243 032

www.lppartnership.co.uk

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

aartioleary@lppartnership.co.uk

Tel 01206 835150

Co. Reg. No. 5677777

11th December 2014

Dear Mrs Lyon

Planning Application by Orbit Homes (2020) Ltd for a Mixed Use Development (Including 278 Dwellings on Land Between Gipping & Bramford Road, Great Blakenham (Ref: 3310/14) – 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 3rd November 2014, and advise that following a review of the applicant's submission NHSE wishes to raise a "**Holding Objection**" 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 Mid Suffolk District.

Background

The proposal is for a mixed use development including 276 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.

NHSE provided pre-application advice on the likely healthcare impacts arising from the proposed development in June 2014, a copy of which is enclosed with this letter.

The advice was based on the increased number of houses proposed since the outline planning permission for the scheme was granted, the latest information on GP list sizes, the current number of whole time equivalent GPs at the catchment surgery and the level of developer contribution paid to date towards mitigating the development's healthcare impacts.

The advice concluded that a residual developer contribution of £60,400 would be required to mitigate the 'capital cost' to the NHS for the provision of additional healthcare services arising

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

Director
James Lawson, BA(Hons) MA MRTPI

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

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

Senior Planner:
Aarti O'Leary, BA(Hons) MA MRTPI

Trainee Planner:
Natalie Garrish, BA(Hons) DipLaw/CPE

Consultant:
Rod Lay, Dip EP CP Cert UD MRTPI

**882 The Crescent, Colchester
Business Park, Colchester, Essex,
CO4 9YQ
www.lppartnership.co.uk**

directly as a result of the revised development proposal, taking into consideration contributions that have already been paid by the developer to the Council.

This necessary healthcare mitigation should be included as a Section 106 Head of Term of Agreement in association with the proposals, to be secured as part of a planning obligation linked to any subsequent planning permission and payable prior to occupation of the development.

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. NHSE's HIA has therefore been updated to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

The GP Catchment Plan to identify the location of the GP practice serving the proposed development (included with NHSE's pre-application advice) is attached to this consultation response.

Healthcare Impact Assessment

Determining the Population Arising

The calculations used to determine the likely new population arising are set out in Table 1 below.

Table 1: Population Arising from Proposed Development

New Unit Type	No. Units Proposed	Occupancy	New Population
Released Plots			
2 bed house	41	1.8	73.8
3 bed house	43	2.6	111.8
4 bed house	31	3.2	99.2
1 bed flat	14	1.3	18.2
2 bed flat	27	1.8	48.6
Sub Total 1	156		351.6
Revised Scheme			
2 bed house	110	1.8	198
3 bed house	131	2.6	340.6
4 bed house	29	3.2	92.8
2 bed flat	6	1.8	10.8
Sub Total 2	276		642.2
Overall Total	432		994³

Notes:

1. Taken from accommodation schedule provided by applicant to inform pre-application advice and Planning Statement submitted with current planning application.

2. Occupancy assumptions based on the averages for

England (2004-2007) as set out in the "Household size by type of accommodation and by number of bedrooms" Table within the DCLG Survey of English Housing.

3. Rounded to nearest whole number.

The Capital Funding Implications of the Proposed Development

Table 2 provides a summary of the capacity position for the GP Catchment Practice once the additional staffing and floorspace requirements arising from the development proposal are factored in, including an estimate of the costs for providing new floorspace and/ or related facilities. The costs for additional car parking capacity are not addressed in the table as NHS England has yet to undertake a detailed audit of the transportation position.

Table 2: Capital Cost Calculation for the Provision of Additional Health Services Arising from the Development Proposal & Developer Contribution

Premises	List Size (01.10.14)	No. GPs (WTE) ¹	Capacity ²	Spare Capacity ³	Additional Population Growth (432 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
Barham & Claydon Surgery, Norwich Road, Barham, IP6 0DJ	1,736	0.75	1,350	-386	994	0.55	71.5	£143,000
Total	1,736	0.75	1,350	-386	994	0.55	71.5	£143,000

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. Taken from Table 1 above.
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 2014 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 £143,000 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.

Taking into consideration the developer's payment of 2 financial contributions to the Council in association with planning permission reference 2326/05 (totalling £80,000), and on the understanding that these contributions are to be transferred to NHS England in due course, a residual contribution of **£63,000** would be required to mitigate the capital cost to the NHS for the provision of health services arising directly as a result of the revised proposals.

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 £63,000 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 £63,000 would fairly and reasonably address the identified healthcare impacts.

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Michelle Lyon

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11th December 2014

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

Cc: NHS England

Encl.



**Ministry
of Defence**

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

Your Reference: **3310/14**
Our reference: DIO/SUT/43/2/89 (2014/1004)

Dear Michelle

MOD Safeguarding – Wattisham Station

Proposal: Erection of 270 dwellings
Location: Land between Gipping & Bramford Road
Grid Ref: 612133, 250236
Planning Ref: **3310/14**

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 03/11/2014. I can confirm that the MOD has no safeguarding objections to this proposal.

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

Yours sincerely

D. Sylvester

Di Sylvester

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**Defence
Infrastructure
Organisation**

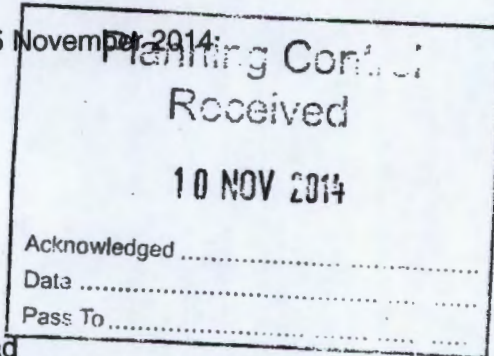
Safeguarding Department
Statutory & Offshore

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

Tel: +44 (0)121 311 2010 Tel (MOD): 94421 2010
Fax: +44 (0)121 311 2218
E-mail: DIO-safeguarding-statutory@mod.uk

www.mod.uk/DIO

05 November 2014



189

From: Claire Hupton

Sent: 26 January 2015 10:45

To: Michelle Lyon

Subject: RE: 3310/14 Landbetween Gipping and Bramfod Road Great Blakenham

Dear Michelle,

Thank you for your email. As the housing units, which were funded under the Kickstart programme have now been delivered we no longer wish to make a comment regarding this application.

Thank you for contacting me.

Regards.

Claire

Claire Hupton MRICS

Area Manager – Cambs, Norfolk & Suffolk

Health and Safety Executive
Hazardous Installations Directorate

Mid Suffolk District Council
Environment and Planning
Council Offices
High Street
Needham Market
Ipswich

Your Ref: 3310/14

Our Ref: MSDC.1238-2014-00014

08 December 2014

IP6 8DL

HSE advice produced by PADHI+ for Mid Suffolk District Council

Land Use Planning Consultation with Health and Safety Executive [Town and Country Planning (Development Management Procedure) (England) Order 2010, Town and Country Planning (Development Management Procedure) (Wales) Order 2012, or Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008]

This HSE advice refers to the proposed development 270 dwellings 6 Flats and a local centre with convenience store and public open space at Land between Gipping and Bramford Road, Great Blakenham, Ipswich, Suffolk, input into PADHI+ on 08 Dec 2014 by Mid Suffolk District Council.

The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the Consultation Distance of major Hazard sites/pipelines. This consultation, which is for such a development and also within at least one Consultation Distance, has been considered using PADHI+, HSE's planning advice software tool, based on the details input by Mid Suffolk District Council. Only the installations, complexes and pipelines considered by Mid Suffolk District Council during the PADHI+ process have been taken into account in determining HSE's advice. Consequently, **HSE does not advise, on safety grounds, against the granting of planning permission in this case.**

This advice is produced on behalf of the Head of the Hazardous Installations Directorate, HSE.

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From: Chris Edwards
Sent: 10 December 2014 15:36
To: 'Stuart Cook'; Michelle Lyon
Cc: Richard Larbi
Subject: RE: VIABILITY - Great Blakenham

Thanks Stuart,

It seems to capture the essence of the brief and is a fair assessment of Orbits final submission in my view. Many thanks for your assistance with this.

Kind regards

Chris

Chris Edwards
Corporate Manager - Asset Utilisation

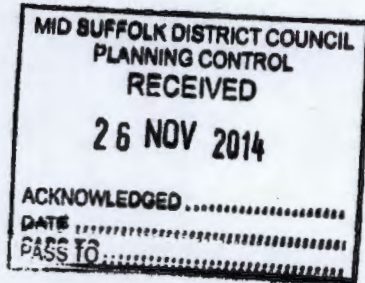


Suffolk Fire and Rescue Service

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

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

Your Ref: 3310/14
Our Ref: FS/F216153
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>



Date: 26/11/2014

Dear Sirs

Land between Gipping Road and Bramford Road, Great Blakenham IP6 0LG
Planning Application No: 3310/14

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

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.

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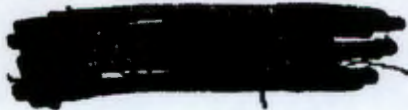
NOT PROTECTIVELY MARKED

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 Mrs A Kempen.

Mrs A Kempen
Water Officer

Copy: Mrs Erica Whettingsteel, EJW Planning Ltd, Lincoln Barn, Norwich Road,
Scoulton, Norfolk NR9 4NP

Enc: Sprinkler Information

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

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

Your Ref: 3310/14
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 24/11/14

Planning Ref: 3310/14

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING

**ADDRESS: Land between Gipping Road and Bramford Road, Great Blakenham
IP6 0LG**

DESCRIPTION: Erection of 270 dwellings and convenience store

NO: HYDRANTS POSSIBLY REQUIRED: REQUIRED

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

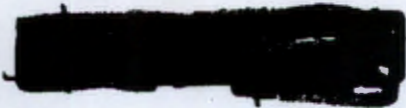
Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

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NOT PROTECTIVELY MARKED

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

A large black rectangular redaction box covering the signature of the sender.

Mrs A Kempen
Water Officer

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creating a better place



Mid Suffolk District Council
Planning Department
131, Council Offices High Street
Needham Market
Ipswich
IP6 8DL

Our ref: AE/2014/118455/01-L01
Your ref: 3310/14
Date: 17 November 2014

Dear Sir/Madam

ERECTION OF 270 DWELLINGS COMPRISING 110 X TWO-BEDROOM HOUSES, 132 X 3 BEDROOM HOUSES AND 28 X 4 BEDROOM HOUSES AND ASSOCIATED GARAGING/CAR PARKING, LANDSCAPING, PUBLIC OPEN SPACE, PLAY AREAS AND ACCESS TO BRAMFORD ROAD, TOGETHER WITH THE CONSTRUCTION OF A CONVENIENCE STORE WITH 6 X TWO-BEDROOM FLATS ABOVE, ASSOCIATED PARKING AND SERVICING AREAS ON LAND AT HACKNEYS CORNER. LAND BETWEEN GIPPING & BRAMFORD ROAD, GREAT BLAKENHAM

Thank you for consulting us about the above planning application which we have reviewed, as submitted, and offer the following advisory comments.

We understand from the Planning Statement submitted by EJW Planning in support of this application that it seeks approval for a re-plan of the remaining parts of the development already consented under the outline scheme for housing originally approved by the Secretary of State on 7 May 2008, under planning permission ref: 2326/05/OUT. The details of the scheme were approved under reserved matters application 3489/09 in March 2010.

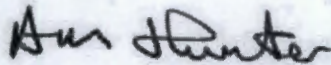
We were consulted on the earlier scheme under 2365/05/OUT – see our response letters dated 27 January 2006 and 12 April 2006 – and following receipt of further information we were able to remove our objections. We were subsequently consulted on the discharge of condition 11 of the approved scheme under 2326/05/OUT. We advised the Council that subject to receipt of further information to address our comments on the Ground Investigation letter report as well as issues raised concerning the Remediation Method Statement, we would be in a position to recommend discharge of condition 11.

It appears to us that the proposed re-plan of the remaining parts of the extant planning permission, does not give rise, in terms of our remit, to any material change to the impacts of the development proposal on the environment. Therefore we have no objection to the latest development proposal and no further comments to add to those already made in our earlier responses.

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

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Yours faithfully



Andrew Hunter
Sustainable Places - Planning Advisor

Direct dial 01473 706749

Direct fax 01473 271320

Direct e-mail andrew.hunter@environment-agency.gov.uk

End

2

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From: Browne Liam [mailto:LBrowne3@anglianwater.co.uk]
Sent: 04 November 2014 11:46
To: Planning Admin
Subject: RE: Consultation on 3310 / 14


Thank you for your email detailing the application. We have taken a brief look and have found that you propose to connect to a private pumping station, this therefore does not require our response on this application.

Ref: 3310/14

Kindest Regards

Planning Administrator

Office: 01733 414690 Mobile: 07902 597584
Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT

love every drop
anglianwater 

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**Developments Affecting Trunk Roads and Special Roads
Highways Agency Response to an Application for Planning Permission**

From: Divisional Director, Network Delivery and Development, East of England, Highways Agency.

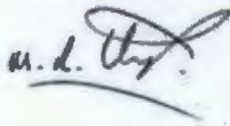
To: Mid Suffolk District Council

Council's Reference: 3310/14

Referring to the notification of a planning application dated 3 November 2015, your reference 3310/14, in connection with the A14, Erection of 270 dwellings comprising 110 x two-bedroom houses, 131 x3 bedroom houses and 29 x 4 bedroom houses and associated garaging/car parking, landscaping, public open space, play areas and access to Bramford Road, together with the construction of a convenience store with 6 x two-bedroom flats above, associated parking and servicing areas on land at Hackneys Corner. Land Between Gipping & Bramford Road, Great Blakenham. Notice is hereby given under the Town and Country Planning (Development Management Procedure) (England) Order 2010 that the Secretary of State for Transport:-

- a) offers no objection;
- ~~b) advises that planning permission should either be refused, or granted only subject to conditions~~
- ~~c) directs conditions to be attached to any planning permission which may be granted;~~
- ~~d) directs that planning permission is not granted for an indefinite period of time;~~
- ~~e) directs that planning permission not be granted for a specified period (see Annex A).~~

Signed by authority of the Secretary of State for Transport

Date: 16 January 2015	Signature: 
Name: Mark Knight	Position: Asset Development Team
The Highways Agency: Woodlands, Bedford Manton Lane Manton Industrial Estate Bedford, MK41 7LW	

From: Bradley Burgett
Sent: 05 January 2015 15:44
To: Michelle Lyon
Cc: 'Lorraine.O'Gorman@highways.gsi.gov.uk'
Subject: FW: FAO Michelle Lyons Planning app. ref 3310/14: Great Blakenham

Good Afternoon,

Please see below email.

Thanks

Bradley Burgett

Technical Support Officer – Development Control

Mid Suffolk District Council | Council Offices | High Street | Needham Market | IP6 8DL

Direct Phone: [01449 724550](tel:01449724550) Direct Email: bradley.burgett@midsuffolk.gov.uk

Enquiries: planningadmin@midsuffolk.gov.uk

Please be advised that any comments expressed in this email are offered as a informal professional opinion unless otherwise stated and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the content of this email.

From: O'Gorman, Lorraine [<mailto:Lorraine.O'Gorman@highways.gsi.gov.uk>]
Sent: 05 January 2015 15:13
To: Planning Admin
Subject: FAO Michelle Lyons Planning app. ref 3310/14: Great Blakenham

Hello,

I have just tried to send the email below to Michelle Lyons but it has bounced back.

Perhaps I have her name spelt incorrectly?

Could you please forward for her attention.

Thanks

Lorraine

Lorraine O'Gorman

Highways Agency | Woodlands | Manton Lane | Bedford | MK41 7LW

Tel: +44 (0) 1234 796162

Web: <http://www.highways.gov.uk>

GTN: 3013 6162

Safe roads, reliable journeys, informed travellers

Highways Agency, an executive agency of the Department for Transport.

From: O'Gorman, Lorraine

Sent: 05 January 2015 15:10

To: 'michelle.lyons@midsuffolk.gov.uk'

Subject: FW: Planning app. ref 3310/14: Great Blakenham

Hi Michelle,

Please accept my apologies for any confusion that may have occurred with regard to this application which I believe you discussed with my colleague David Abbott. The HD that was issued before Christmas should have been accompanied with the attached technical note which I had suggested was forwarded to the developers consultant. There are not major issues with the application but there are some issues we require further clarification on and I had suggested a meeting with the developer, yourselves and the HA in the new year to get this resolved as quickly as possible. Bearing in mind SCC's comments it may also be useful if they also were able to attend.

It may be the points raised in the TN can be addressed fairly quickly through email in which case we will lift the HD and provide our final response as soon as possible. Again please accept my apologies for the confusion with this application as I am aware you are keen to progress it as quickly as possible.

Kind Regards,

Lorraine

Lorraine O'Gorman

Highways Agency | Woodlands | Manton Lane | Bedford | MK41 7LW

Tel: +44 (0) 1234 796162

Web: <http://www.highways.gov.uk>

GTN: 3013 6162

Safe roads, reliable journeys, informed travellers

Highways Agency, an executive agency of the Department for Transport.

From: Abbott, David

Sent: 24 December 2014 12:20

To: 'michelle.lyons@midsuffolk.gov.uk'

Cc: O'Gorman, Lorraine; Knight, Mark

Subject: Planning app. ref 3310/14: Great Blakenham

Michelle

This case has temporarily landed on my desk in the absence of both Lorraine O'Gorman and, now, Eric Cooper. Eric asked if I would review the information which led to issuing or renewed holding direction with a view to getting you at least an interim response by early in the new year. I am unfamiliar with the background to this application (its well off my usual patch) and I share these thoughts realising there may be issues I am unaware of or that have already been resolved.

It appears the crux for us centres on a small number of issues which have also been identified by SCC in their review of the TA. These are (i) the age of the traffic data used for the baseline; (ii) the distribution assumptions (related to (i)); and (iii) the lack of junction assessment/modelling at the A14 J52 interchange. Our original holding direction issued by Lorraine on 17/11/14 was on the basis of insufficient information.

From looking at the information on this case on your website it appears arguments have been put forward for and against the veracity of the traffic data in relation to (i)

and (ii) but the need to model A14 J52 appears to have been dismissed on the basis that similar developments have been successfully assessed previously. Given the lapsed time since took place we cannot automatically concur with this. Whether or not the presented flows are flawed, we need to see evidence as part of the TA that A14 J52, and in particular the A14 exit slip roads, will adequately cope with these forecast traffic increases, flawed or otherwise. It may appear that, of themselves, the increases in flows on the slip roads are not substantial. However, in combination with corresponding increases to circulating flows passing those slip roads (of the order of 10% in at least one case) the effects could well turn out to be significant.

While a ten year horizon (from application registration) is still relevant, DfT Circular 02/2013 now places greater emphasis on the ability of the SRN to accommodate development either at opening year or at substantial phase completions. It would seem to make sense then initially for the applicant to model J52 at least at the base year with and without the development. It should at that point become clearer if further work would be required if any potentially severe congestion issues become apparent.

Lorraine is on leave now until the start of the new year and I will need to discuss this with her then. In the meantime I hope this helps to steer both you and the applicant's technical team in the right direction.

David

David Abbott, Asset Manager: Area 8

Highways Agency | Woodlands | Manton Lane | Bedford | MK41 7LW

Tel: +44 (0) 1234 796221 | Mobile: + 44 (0) 7771 677 517

Web: <http://www.highways.gov.uk>

GTN: 3013 6221

Safe roads, reliable journeys, informed travellers

Highways Agency, an executive agency of the Department for Transport.

The original of this email was scanned for viruses by the Government Secure Intranet virus scanning service supplied by Vodafone in partnership with Symantec. (CCTM Certificate Number 2009/09/0052.) This email has been certified virus free.

Communications via the GSi may be automatically logged, monitored and/or recorded for legal purposes.

Briefing Note 01

AECOM

Project:	HA Spatial Planning Arrangement 2011-2015	Job No:	60295882/ DS021
Subject:	Blakenham Fields, Great Blakenham		
Reference:	Transport Assessment – July 2014		
Made By:	Andrew Cuthbert	Date:	3rd December 2014
Checked By:	Liz Judson	Date:	4th December 2014
Verified By:	Simon Willison	Date:	4th December 2014
Approved By:	Andrew Cuthbert	Date:	5th December 2014

1. This Briefing Note comprises an initial 'in-principle' review of a Transport Assessment (TA) dated July 2014, prepared by Russell Giles Partnership (RGP) in support of Planning Application 3310/14 to vary the quantum of development proposed on the Blakenham Fields site at Great Blakenham, Suffolk. The Local Planning Authority is Mid-Suffolk District Council and the local road network in the vicinity is the responsibility of Suffolk County Council.
2. The site is located in the centre of the village of Great Blakenham, some 6km to the NW of Ipswich. It is located some 500m from the A14/B1113 Claydon junction (A14 J52) which would form the first point of access to the Strategic Road Network (SRN).
3. This is a brown field site, previously used as a cement works and it is located in an area generally characterised by heavy industry and suburban-type housing developments. The site has a number of extant planning consents dating back to 2010/2011 for a mixed-use development comprising 356 dwellings, B1 office floor space, a local retail centre and a primary school. This development is already in the process of being built out. The current planning application seeks to vary the consent by increasing the number of dwellings to 432 in exchange for the removal of the B1 office and the school. The net change proposed can be summarised as follows:

Table 1: Proposed change to the quantity of development proposed

Land Use	Consented	Proposed	Net Change
Residential Dwellings	356 dwellings	432 dwellings (*)	+ 76 dwellings
B1 office floor space	2,000 sq m GFA	None	- 2,000 sq m GFA
Local retail centre	500 sq m	500 sq m	None
Education	Primary school	None	-1 primary school

(*) – the figure of 440 has been adopted in the TA for robustness

4. When the TA supporting the 2011 consent was carried out, it took account of a major consented development nearby known as SnOasis. SnOasis was to be a winter sports themed leisure development with a regional catchment, located in a former quarry; and it brought with it mitigation in the form of significant works to the local highway network and a new railway station at Great Blakenham. The impact of Blakenham Fields was assessed in the context of SnOasis going ahead and the site access arrangements and highway mitigation measures reflected this.
5. The current TA takes a position in which SnOasis is now unlikely to go ahead and any replacement land-use on the SnOasis site would have to be supported by a fresh planning application which would have to take Blakenham Fields into account as committed development. The current status of SnOasis and the assumption that any future development on the SnOasis

Transportation

Direct Tel: 01245 771235
+44 (0)1245 771200
+44 (0)1245 771299
E-mail: andrew.cuthbert@aecom.com
www.aecom.com

Saxon House
27 Duke Street
Chelmsford
Essex CM1 1HT

- site would require a fresh planning application should be clarified with the Local Planning Authority.
6. The current TA introduces a new committed site known as the SITA site (an 'energy-from-waste' facility). The allowance made for this site in the traffic forecasting is said to be based on a TA which was fully scoped and agreed with Suffolk County Council.
 7. The current TA calculates the total increase in traffic flows associated with the development now proposed. The traffic forecasting appears to be carried forward from the methodology adopted in support of the 2011 planning consent. This is said to have been agreed with Suffolk County Council as local highway authority. It is unclear to what extent the Highways Agency was party to that agreement and this should be clarified.
 8. From a superficial overview, the traffic forecasting adopted for the current TA appears to be reasonably robust, with residential trip rates that reflect the site's village location and a trip distribution that assigns 60% of outbound and 42% of inbound traffic via A14 J52 (this imbalance being due to a banned right turn out of Bramford Road at its junction with the B1113, requiring this traffic to route via A14 J52 in the outward direction, where it would make a U-turn back into the B1113). If a full detailed audit of the TA is required, these features of the assessment would need to be re-visited.
 9. The total (gross) increase in flows at A14 J52 resulting from 440 dwellings and 500 sq m of retail floor space (the quantity of development adopted in the TA) is stated to be as follows:

Table 2: Total increase in flow at A14 J52 from the proposed development

Peak Hour	Outbound	Inbound	Two-way total
AM Peak	115 veh/hr	28 veh/hr	143 veh/hr
PM Peak	61 veh/hr	77 veh/hr	138 veh/hr

10. These flows appear to be correctly derived from the trip generation and distribution adopted. If a full detailed audit of the TA is required, the accuracy of these figures would need to be confirmed.
11. Para 5.4.10 of the TA states that no traffic capacity assessment has been undertaken in the current TA for A14 J52 because this junction has "*already been subject to detailed capacity assessments through other consented developments that have taken into account the permitted mixed uses on this site and the current development proposals provide a similar level of development on the site. Therefore the existing capacity assessments at those junctions would remain representative*".
12. From the Highways Agency's perspective, this statement is unsatisfactory for several reasons.
13. Firstly, on the basis of the traffic flow increases set out in the TA and summarised in Table 2 above, a full, up-to-date, traffic capacity assessment of the roundabout at A14 J52 would be required in order to support this level of growth.
14. However, secondly, these are 'gross' figures which include a significant amount of development that is proceeding in accordance with the extant planning consents. No indication is given in the TA as to the net change in generated traffic that would result from the variation in the land-use mix now being sought. Given the relative scale of the change set out in Table 1 above, it is possible that the net increase in traffic flows at A14 J52 for the current planning application relative to the consented land-use mix could be minimal. However, this would have to be

Transportation

Direct Tel: 01245 771235
 +44 (0)1245 771200
 +44 (0)1245 771299
 E-mail: andrew.cuthbert@aecom.com
 www.aecom.com

Saxon House
 27 Duke Street
 Chelmsford
 Essex CM1 1HT

205

From: O'Gorman, Lorraine

Sent: 16 January 2015 08:10

To: Michelle Lyon

Subject: RE: 3310/14 Land between Gipping and Bramford Road Great Blakenham

Hi Michelle,

Thanks for getting back to me. As I said in my initial response it was just a matter of clarifying a few issues and nothing major and this has been done through the developers response providing confidence that the development will not impact on the A14.

As such we will lift the Holding Direction and Issue a TR110 to that effect later today.

My apologies again for the confusion just prior to Christmas.

Kind Regards,

Lorraine

Lorraine O'Gorman

Highways Agency | Woodlands | Manton Lane | Bedford | MK41 7LW

**Developments Affecting Trunk Roads and Special Roads
Highways Agency Response to an Application for Planning Permission**

From: Divisional Director, Network Delivery and Development, East of England, Highways Agency.

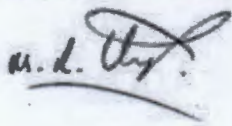
To: Mid Suffolk District Council

Council's Reference: 3310/14

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- a) offers no objection;
- ~~b) advises that planning permission should either be refused, or granted only subject to conditions~~
- ~~c) directs conditions to be attached to any planning permission which may be granted;~~
- ~~d) directs that planning permission is not granted for an indefinite period of time;~~
- ~~e) directs that planning permission not be granted for a specified period (see Annex A).~~

Signed by authority of the Secretary of State for Transport

Date: 16 January 2015	Signature: 
Name: Mark Knight	Position: Asset Development Team
The Highways Agency: Woodlands, Bedford Manton Lane Manton Industrial Estate Bedford, MK41 7LW	

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From: Abbott, David
Sent: 24 December 2014 12:25
To: 'michele.lyon@midsuffolk.gov.uk'
Cc: O'Gorman, Lorraine; Knight, Mark
Subject: FW: Planning app. ref 3310/14: Great Blakenham

Michelle

This case has temporarily landed on my desk in the absence of both Lorraine O'Gorman and, now, Eric Cooper. Eric asked if I would review the information which led to issuing or renewed holding direction with a view to getting you at least an interim response by early in the new year. I am unfamiliar with the background to this application (its well off my usual patch) and I share these thoughts realising there may be issues I am unaware of or that have already been resolved.

It appears the crux for us centres on a small number of issues which have also been identified by SCC in their review of the TA. These are (i) the age of the traffic data used for the baseline; (ii) the distribution assumptions (related to (i)); and (iii) the lack of junction assessment/modelling at the A14 J52 interchange. Our original holding direction issued by Lorraine on 17/11/14 was on the basis of insufficient information.

From looking at the information on this case on your website it appears arguments have been put forward for and against the veracity of the traffic data in relation to (i) and (ii) but the need to model A14 J52 appears to have been dismissed on the basis that similar developments have been successfully assessed previously. Given the lapsed time since took place we cannot automatically concur with this. Whether or not the presented flows are flawed, we need to see evidence as part of the TA that A14 J52, and in particular the A14 exit slip roads, will adequately cope with these forecast traffic increases, flawed or otherwise. It may appear that, of themselves, the increases in flows on the slip roads are not substantial. However, in combination with corresponding increases to circulating flows passing those slip roads (of the order of 10% in at least one case) the effects could well turn out to be significant.

While a ten year horizon (from application registration) is still relevant, DfT Circular 02/2013 now places greater emphasis on the ability of the SRN to accommodate development either at opening year or at substantial phase completions. It would seem to make sense then initially for the applicant to model J52 at least at the base year with and without the development. It should at that point become clearer if further work would be required if any potentially severe congestion issues become apparent.

Lorraine is on leave now until the start of the new year and I will need to discuss this with her then. In the meantime I hope this helps to steer both you and the applicant's technical team in the right direction.

David

David Abbott, Asset Manager: Area 8

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**Developments Affecting Trunk Roads and Special Roads
Highways Agency Response to an Application for Planning Permission**

From: Divisional Director, Network Delivery and Development, Eastern Region, Highways Agency.

To: Mid Suffolk District

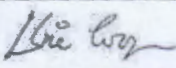
Council's Reference: 3310/14

Referring to the notification of a planning application dated 3 November 2014, your reference 3310/14, in connection with the A14, application for the erection of 270 dwellings comprising 110 x two-bedroom houses, notice is hereby given under the Town and Country Planning (Development Management Procedure) (England) Order 2010 that the Secretary of State for Transport:-

- ~~a) offers no objection;~~
- ~~b) advises that planning permission should either be refused, or granted only subject to conditions~~
- ~~c) directs conditions to be attached to any planning permission which may be granted;~~
- ~~d) directs that planning permission is not granted for an indefinite period of time;~~
- e) directs that planning permission not be granted for a specified period (see Annex A).

(delete as appropriate)

Signed by authority of the Secretary of State for Transport

Date: 19 December 2014	Signature: 
Name: Eric Cooper	Position: ASSET DEVELOPMENT TEAM
The Highways Agency: Woodlands, Manton Lane Bedford MK41 7LW	

Reason for the Direction at E) above

The Secretary of State requires sufficient time to determine whether the proposed development would generate traffic on the trunk road to an extent that would be incompatible with the use of the trunk road as part of the national system of routes for through traffic in accordance with Section 10(2) of the Highways Act 1980, and with safety of traffic on the trunk road.

The direction remain in effect until **30 January 2015**

Safe roads, reliable journeys, informed travellers

Our ref: M121502
 Your ref: 3310/14

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

Lorraine O'Gorman
 Network Delivery & Development - East
 Woodlands
 Manton Lane
 Bedford MK41 7LW

Direct Line: 01234 796

19 December 2014

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
 ORDER 2010**

PLANNING APPLICATION: 3310/14

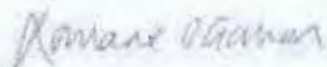
Location: Land Between Gipping & Bramford Road, Great Blakenham
Proposal: Erection of 270 dwellings comprising 110 x two-bedroom houses, 131 x 3 bedroom houses and 29 x 4 bedroom houses and associated garaging/car parking, landscaping, public open space, play areas and access to Bramford Road, together with the construction of a convenience store with 6 x two-bedroom flats above, associated parking and servicing areas on land at Hackneys Corner.

Following our previous holding direction, please find attached an extension to the 31st January 2015 and a briefing note that details further discussion required regarding this development. Our view at the moment is that there is just some further clarification required on matters not covered within the Transport Assessment. We are confident these can be easily clarified with yourselves and the developer.

Should you wish to have a meeting in the new year to discuss these in greater detail then please let me know. As soon as they are resolved we will be able to lift the Holding Direction and provide our final response. If you could forward the attached briefing note to the applicants consultant.

Please find attached a Direction under Article 25 of the Town and Country Planning (Development Management Procedure) Order 2010 which shall be maintained until such time as the Secretary of State has assessed the traffic implications for the strategic trunk road network. The Direction shall be maintained until 31st January 2015.

Yours Sincerely



Lorraine O'Gorman
 Asset Development Manager
 Email: PlanningEE@highways.gsi.gov.uk



An executive agency of the
 Department for Transport.

**Developments Affecting Trunk Roads and Special Roads
Highways Agency Response to an Application for Planning Permission**

From: Divisional Director, Network Delivery and Development, East of England, Highways Agency.

To: Mid Suffolk District Council

Council's Reference: 3310/14

Referring to the notification of a planning application dated 3 November 2014, your reference 3310/14, in connection with the A14, Erection of 270 dwellings comprising 110 x two-bedroom houses, 131 x 3 bedroom houses and 29 x 4 bedroom houses and associated garaging/car parking, landscaping, public open space, play areas and access to Bramford Road, together with the construction of a convenience store with 6 x two-bedroom flats above, associated parking and servicing areas on land at Hackneys Corner. Land Between Gipping & Bramford Road, Great Blakenham. Notice is hereby given under the Town and Country Planning (Development Management Procedure) (England) Order 2010 that the Secretary of State for Transport:-

- a) offers no objection;
- ~~b) advises that planning permission should either be refused, or granted only subject to conditions~~
- ~~c) directs conditions to be attached to any planning permission which may be granted;~~
- ~~d) directs that planning permission is not granted for an indefinite period of time;~~
- e) directs that planning permission not be granted for a specified period (see Annex A).

Signed by authority of the Secretary of State for Transport

Date: 19 December 2014

Signature: 

Name: Mark Knight

Position: Asset Development Team

The Highways Agency: Woodlands, Bedford
Manton Lane
Manton Industrial Estate
Bedford, MK41 7LW

Reason For Direction Given at e)-

There is insufficient information presently available to the Secretary of State to determine whether the proposed development would generate traffic on the trunk road to an extent that would be incompatible with the use of the trunk road as part of the national system of routes for through traffic in accordance with Section 10(20) of the Highways Act 1980, and with safety of traffic on the trunk road.

The direction shall be maintained until such time as the Secretary of State has received sufficient information about the traffic implications to enable him to come to a view.

The direction shall remain valid until 31st January 2015.