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	<b>PLANNING REFERRALS COMMITTEE</b>
<b>DATE:</b>	<b>FRIDAY, 21 FEBRUARY 2020 9.30 AM</b>
<b>VENUE:</b>	<b>KING EDMUND CHAMBER - ENDEAVOUR HOUSE, 8 RUSSELL ROAD, IPSWICH</b>

For consideration at the meeting on Friday, 21 FEBRUARY 2020, the following additional or updated papers that were unavailable when the Agenda was printed.

## **T A B L E D   P A P E R S**

Page(s)

- a      **DC/18/04247 LAND OFF BURY ROAD, THE STREET, WOOLPIT, 3 - 16  
IP30 9SA**

For more information about this meeting, including access arrangements and facilities for people with disabilities, please contact the Committee Officer, Robert Carmichael - 01449 724930 - [committees@babberghmidsuffolk.gov.uk](mailto:committees@babberghmidsuffolk.gov.uk)

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# Agenda Item 7a

**From:** James Alflatt <[James.Alflatt@bidwells.co.uk](mailto:James.Alflatt@bidwells.co.uk)>  
**Sent:** 22 November 2018 18:05  
**To:** Bradly Heffer <[Bradly.Heffer@babberghmidsuffolk.gov.uk](mailto:Bradly.Heffer@babberghmidsuffolk.gov.uk)>; Gemma Pannell <[Gemma.Pannell@babberghmidsuffolk.gov.uk](mailto:Gemma.Pannell@babberghmidsuffolk.gov.uk)>  
**Cc:** Robert Eburne <[Robert.Eburne@hopkinshomes.co.uk](mailto:Robert.Eburne@hopkinshomes.co.uk)>; Simon Bryan <[Simon.Bryan@hopkinshomes.co.uk](mailto:Simon.Bryan@hopkinshomes.co.uk)>; David <[David@evolution-planning.co.uk](mailto:David@evolution-planning.co.uk)>; Jake Lambert <[jake.lambert@bidwells.co.uk](mailto:jake.lambert@bidwells.co.uk)>  
**Subject:** RE: DC/18/04247 Land off Bury Road, Woolpit

Bradly,

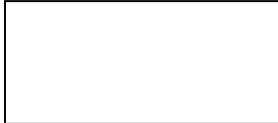
Hope this finds you well.

Just picking up some of the points from our recent meeting, with regards to Historic England. Please see below correspondence between our heritage consultants (CgMS) and David Eve. As discussed, I would draw your attention to the fact that Historic England would not object to the application and acknowledge that the way the masterplan has set the proposed development away from the conservation area and is of a lower density in this area is a very positive approach endorsed by Historic England. Hopefully the below response from David expands upon their previous representations, confirming that they do not object to the application.

Any further queries regarding this, then please don't hesitate to contact me. We will revert back to you separately on both the ecology and LLFA matters once the required information is available.

Kind Regards,

James



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**James Alflatt** BA(Hons) DipTP MSc MRTPI PIEMA  
Partner, Planning

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**From:** Eve, David [<mailto:David.Eve@HistoricEngland.org.uk>]  
**To:** Thomas Rumley  
**Subject:** [EXT]Re: HE Ref: P00972487 - Land off Bury Road Woolpit

Dear Tom,

thank you for discussing the above case on the phone with me and for your helpful summary of the discussion in your previous email. I think this summarises out position well, namely that we acknowledge the way the proposed layout has responded to the constraints of the historic environment and would not object to the application but do retain some concerns about the impact on views of the parish church from the north. The way proposed building is set away from the Conservation area boundary and the lower density of development with open space adjacent is very positive and does much to reduce this impact. We would therefore leave it to the Council to consider if further improvement could be made in this area, but as I say, would not object to the application.

I hope this clarifies the situation.

Best wishes

David

David Eve | Inspector of Historic Buildings and Areas (Norfolk, Suffolk and Bedfordshire)  
Direct Line: 01223 582721  
Mobile: 07968 229581

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**From:** Thomas Rumley <[thomas.rumley@cgms.co.uk](mailto:thomas.rumley@cgms.co.uk)>  
**Sent:** 24 October 2018 10:46  
**To:** Eve, David  
**Cc:** Myk Flitcroft  
**Subject:** Re: HE Ref: P00972487 - Land off Bury Road Woolpit

Hi David,

Thank you for discussing your response to planning application DC/18/04247 at Woolpit on Monday. I have summarised our telephone call conversation below. Please can you review this and confirm whether I have interrupted your follow-up comments correctly.

- You were aware and reviewed prior to your response the application's proposals plans for density, character areas, open space and landscape plans.
- You broadly agree with our assessment that there would be some harm to the significance of less St Mary's Church and the Conservation Area and that this would amount to less than substantial harm. However, you do not object to the proposals in principal.
- You raised concerns over the location of housing in the south-east quadrant of the development in regards to experiencing a countryside setting on entry/exiting the village however, you are aware of the design mitigation that we are proposing (lower density within this area, retention of open space, the position of a school site and extension of the cemetery) and indicated that these design/mitigation measures have responded better than other areas of new/recent development within Woolpit.
- Views towards the Church of St Mary's Church (Woolpit) and Church of St John (Elmswell) from the Site are not considered designed views but you welcome the incorporation of sight lines through the development which will help to retain/create new views of these churches. You suggested that opening these/widening of the sight lines in the south-east quadrant would be preferable however, we discussed that this area will contain a lower housing density and a country character in the built form (as described within the Design and Access Statement), which will help to preserve more sensitive areas and views to the church.

In the interim between our discussion, my client has asked whether you would consider revising your response to reflect our conversation?

Kind regards,

Tom

**Tom Rumley BSc(Hons) MSc**  
**Senior Heritage Consultant – CgMs/RPS Historic Environment**  
**Tel: 01636 642 707**  
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## **CgMs Heritage**

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**From:** James Alflatt

**Sent:** 15 November 2018 18:05

**To:** 'Bradly Heffer' <[Bradly.Heffer@babberghmidsuffolk.gov.uk](mailto:Bradly.Heffer@babberghmidsuffolk.gov.uk)>; 'Gemma Pannell' <[Gemma.Pannell@babberghmidsuffolk.gov.uk](mailto:Gemma.Pannell@babberghmidsuffolk.gov.uk)>

**Cc:** Robert Eburne <[Robert.Eburne@hopkinshomes.co.uk](mailto:Robert.Eburne@hopkinshomes.co.uk)>; 'Simon Bryan' <[Simon.Bryan@hopkinshomes.co.uk](mailto:Simon.Bryan@hopkinshomes.co.uk)>; David <[David@evolution-planning.co.uk](mailto:David@evolution-planning.co.uk)>

**Subject:** DC/18/04247 Land off Bury Road, Woolpit

Bradly/Gemma,

Good to meet with you both yesterday and hopefully you found our meeting a useful update/review with regards to the consultee responses received on the above application and our direction of travel in addressing the outstanding issues. Thought it would be useful to outline our agreed actions:

**Response to SWT and Place Services**

Bidwells to liaise with Applied Ecology (Project Ecologist) and issue rebuttal correspondence to Council

**Response to LLFA**

MLM continue to finalise issue with LLFA including undertaking necessary dye testing. As discussed this was attempted on site this week, however the watercourse was dry. This will be re-attempted once weather conditions change.

One updated version of the FRA will be provided to the Council, once all LLFA matters have been addressed, and the LLFA have agreed the updated draft. The timing for this will be dictated by the timing of the above investigations.

**Parish Council**

Agreed that we would not be engaging any further with the Parish Council, as many of the issues raised, can now be rebutted by the positive statutory consultee responses received.

**Historic England**

Bidwells will share with Council updated response to be received from David Eve, following our archaeological consultants further discussions

**S106**

Council to instruct Council lawyers and Hopkins to instruct Birketts to commence drafting of the s106

**Conditions**

Council to issue preliminary set of draft conditions, based upon responses received, so we can review and agree

**Viability**

Agreed this would be issued shortly, and the Council was likely to appoint the District Valuer to review the appraisal.

**Committee Dates**

Subject to addressing technical matters prior to Christmas, agreed that committee dates in new year would be considered.

Hopefully the above picks up the key points, please don't hesitate to come back to me if you have any further queries.

Kind Regards,

James



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**James Alflatt** BA(Hons) DipTP MSc MRTPI PIEMA  
Partner, Planning

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**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Vincent Pearce – Principal Planning Officer

From: Julie Abbey-Taylor, Strategic Housing Team Manager

Date: 18.2.2020

SUBJECT: - **Application Reference: DC/18/04247**

Proposal: Outline Planning application for the erection of up to 300 dwellings, construction of a new spine road, land for new primary school, burial ground extension, village car park and associated infrastructure on land off Bury Road, Woolpit

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**Key Points**

**1. Background Information**

A development proposal for up to three hundred (300) residential dwellings
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This is an open market development and should offer 105 affordable housing units which = 35% policy compliant position. The applicant is not proposing a policy compliant position in terms of numbers of AH and has included 20% affordable housing provision – 60 dwellings on the basis of scheme viability submitted by the applicant.
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**2. Housing Need Information:**

2.1 This information has been updated to take account of the revised Strategic Housing Market Assessment (SMHA) document, which was updated in 2019 and confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for **127 new affordable homes per annum which is an increase of 30 dwellings per annum against the 2017 SHMA report.**

2.3

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property-owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa.690 applicants registered for affordable housing in Mid Suffolk at January 2020.

2.7 A Local Housing Needs survey was carried out by Community Action Suffolk in partnership with the Parish and District Council in 2017.

2.8. This site is a S106 planning obligation site, so the affordable housing provided will be to meet district wide need hence the **690** applicants registered is the important number.

### 3. Proposed Mix for Open Market homes.

PRIVATE MARKET HOUSING			AFFORDABLE HOUSING*		
No. of Bed-rooms	No. of Dwell-ings	%	No. of Bed-rooms	No. of Dwellings	%
1 bed	16	7	1 bed	10	17
2 bed	56	23	2 bed	33	55
3 bed	102	42.5	3 bed	12	20
4 bed	66	27.5	4 bed	5	8
Total	240	100	Total	60	100

The table above only refers to bedroom numbers not property types. The inclusion of bungalows/chalet bungalows would be welcomed as this will provide opportunities for older people to downsize and developers need to assist with meeting the needs of our aging demographic by providing suitable housing for people to downsize to. Looking at the table above and one below, there is an over provision of 3 bed homes and under provision of 2 bed accommodation when compared to the % amounts for 1 to 4 bed roomed accommodation in the open market sector.

**See table below from the 2019 Strategic Housing Market Assessment which sets out the demand/supply for owner-occupied properties up to 2036.**

**Table 4.4e Size of new owner-occupied accommodation required in Mid Suffolk over the next 18 years**

Size of home required	Current size profile	Size profile 2036	Change required	% of change
One bedroom	707	1,221	515	7.2%
Two bedrooms	5,908	8,380	2,472	34.4%
Three bedrooms	13,680	15,784	2,104	29.3%
Four or + bedrooms	12,208	14,303	2,096	29.2%
<b>Total</b>	<b>32,502</b>	<b>39,688</b>	<b>7,186</b>	<b>100.0%</b>

- The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:
  - 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.

- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

#### **4. Proposed mix for Affordable Housing**

4.1 105 of the proposed dwellings on the development should be for affordable housing if providing at 35% of the total development. The application, however, is offering only 20% affordable housing which provides 60 dwellings on the site. Again, information is only provided on the basis of bedroom numbers, not property types or tenure.

In order to justify a level of affordable housing at 20%, a viability appraisal must be submitted and reviewed. If 20% is the final position, this would provide 60 dwellings and they should be provided in the form set out below: -

##### **Rented (45): -**

- 6 x 1 bed 2-person flats @ 50sqm – reduction on the number proposed
- 4 x 2 bed 4-person flats @ 70 sqm
- 4 x 2-bedroom 3-person bungalows @ 61sqm
- 24 x 2 bed 4-person houses @ 79 sqm
- 7 x 3 bed 5-person houses @ 93 sqm

##### **Shared Ownership (15): -**

4 x 2 bed 4-person flats @ 70 sqm  
 8 x 2 bed 4-person houses @ 79 sqm  
 3 x 3 bed 5-person house @ 93 sqm.

##### **If 35% affordable housing was to be secured, we would require the following mix: -**

##### **Rented (73 dwellings): -**

6 x 1 bed 2-person flats @ 50 sqm  
 6 x 2 bed 4-person flats @ 70 sqm  
 6 x 2 bed 3-bungalows @ 63sqm  
 36 x 2 bed 4-person houses @ 79sqm  
 17 x 3 bed 5-person houses @ 93 sqm  
 2 x 3 bed 6-person houses @ 102sqm

##### **Shared Ownership (32 dwellings): -**

4 x 2 bed 4-person flats @ 70 sqm  
 4 x 2 bed 3-person bungalows @ 61 sqm

16 x 2 bed 4-person houses @ 79 sqm  
8 x 3 bed 5-person houses @ 93sqm

**The above mix is requested and to be included in the S106 agreement if the permission is granted.**

#### **5. Other requirements for affordable homes:**

- Properties must be built to current Nationally Described Space Standards in accordance with Housing Technical Standards March 2015.
- The council is granted 100% nomination rights to all the affordable units on first lets and a minimum of 75% on relets. A draft Nomination agreement should form one of the S106 agreement schedules.
- Adequate parking and cycle storage provision is made for the affordable housing units.
- Shared ownership initial shares should not exceed 70%.
- The affordable housing should be delivered at the same time as open market dwellings – a trigger mechanism should be included in the S106 agreement as set out below:  
Standard clauses in the S106 covering delivery of the affordable homes: -
  - (a) not Occupy or permit Occupation of more than fifty per cent (50%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until fifty per cent (50%) of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider; and
  - (b) not Occupy or permit Occupation of more than eighty per cent (80%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until all of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider.

Julie Abbey-Taylor, Strategic Housing Team Manager.

## (2) MID SUFFOLK DISTRICT COUNCIL

**Our ref:** Woolpit NP Reg 16 Consultation

**Date:** Thursday 6<sup>th</sup> February 2020

Dear Janet,

- 1. Consultation under Regulation 16 of the N'hood Planning (General) Regulations 2012 (as amended): The Woolpit Neighbourhood Development Plan 2016 - 2036**
- 2. Response from Mid Suffolk District Council**

Following formal submission of the Woolpit Neighbourhood Plan (the Woolpit NP) we have revisited our comments we made on the Regulation 14 document and have taken time to look at this latest draft Plan in detail. Many of suggestions put forward have been implemented but, regrettably, we find it necessary to place on record the following which focuses primarily on the matter of housing numbers. We also include links to quoted sources at the end of this letter.

### **Section 4 Housing Policies and Calculation of Housing Need (page 65)**

In our Reg 14 response we advised that the housing numbers set out in our August 2017 Joint Local Plan were out of date and had been superseded by the introduction of a new standard methodology for calculating district-wide housing need following the revision to the National Planning Policy Framework in July 2018. Whilst not being able to give the Neighbourhood Planning Group certainty on the likely requirement for Woolpit at the time [April 2019] we did advise that a figure higher than that being provided in the Neighbourhood Plan could not be ruled out.

The preparation of the Joint Local Plan is based upon the identification of a spatial strategy, which considers consultation responses to the 2017 document, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area, and the infrastructure capacity and opportunities, all of which is set out in paragraph 9.8 on page 38 of the Joint Local Plan Preferred Options document (July 2019).

In the submitted Consultation Statement, mention is made that the total housing requirement for the Woolpit NP has been amended from 252 dwellings to 255 dwellings as set out in the appendix on page 65 of the submitted Plan. However, this applies to an assumption that Core Villages meet 25% of the District housing requirement, with 20% distributed *pro-rata* among all the Core Villages, and the extra 5% *pro-rata* among only those Core Villages within 2-kilometres of an A-road. It continues to follow the out of date housing numbers of 2017, as noted above. The appendix also notes that a preferred spatial distribution policy had not been published, despite this being published the week in advance of the Mid Suffolk Council meeting that took place on 27<sup>th</sup> June 2019 and, subsequently, in the Joint Local Plan Preferred Options consultation document published on 22<sup>nd</sup> July 2019, i.e. before the Woolpit NP Consultation Statement was published.



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In early July 2019 there was therefore an opportunity for the Woolpit NP Group to revisit the housing requirement, to amend their draft plan accordingly, and to decide whether it would be appropriate or not for them to re-consult on their plan at the Regulation 14 stage.

The Preferred Options Joint Local Plan policy SP04 (page 39) identifies a spatial distribution, which is not focused towards the Ipswich Fringe as stated in the Woolpit NP appendices. This emerging policy clearly identifies a total of 43% of the total new homes planned for, being delivered in core villages in Mid Suffolk District, of which Woolpit is one. Therefore, when assessing the location of Woolpit in accordance with emerging Joint Local Plan as set in paragraph 9.8, a minimum requirement of 727 homes is identified as at 1<sup>st</sup> April 2018, and which also contained any outstanding planning permissions granted but not yet completed as at 1<sup>st</sup> April 2018.

The A14 corridor is part of the Strategic Road Network and therefore cannot be compared to other 'A' roads in Mid Suffolk. Furthermore, the A14 corridor runs in parallel with the Ipswich to Norwich and Ipswich to Cambridge railway line and is defined as a strategic transport corridor in the Preferred Options Joint Local Plan.

Therefore, the emerging Joint Local Plan proposes to allocate sites LA093 – Land East of Green Road (49 dwellings) and LA094 – Land South of Old Stowmarket Road (120 dwellings), [WPT4 and WPT3 in the Neighbourhood Plan], both of which have planning permission granted. In respect of site WPT4 / LA093, this is currently under construction. A reserved matters application is currently being considered for 115 dwellings on site WPT3 / LA094.

The Preferred Options Joint Local Plan also allocates sites LA095 – Land North East of The Street (500 dwellings), LA096 – Land North East of Heath Road (10 dwellings) and LA097 – Land West of Heath Road (30 dwellings). These sites are not allocated in the Woolpit NP although we acknowledge a site also on Land South of Old Stowmarket Road is allocated for 40 dwellings in the Neighbourhood Plan (reference WPT5), on which an outline planning application is currently being considered for 40 dwellings.

The difference between the housing requirement identified in the Joint Local Plan and that contained in the Neighbourhood Plan is effectively the quantum identified on site allocation LA095. Within this site allocation is land for a pre-school and primary school, which is required to support the plan-led growth identified in both Woolpit and Elmswell. As established in the Babergh & Mid Suffolk Infrastructure Delivery Plan (IDP) (July 2019) the new primary school is identified as a 210-place school initially and able to expand to 420 places. The site allocation LA095 also aims to deliver other key infrastructure required to enable the sustainable growth of the area, such as the new cycle/pedestrian link between Elmswell and Woolpit, as well as mitigation measures and developer contributions towards highways, public transport and health provision.

In considering the housing requirement identified in the Preferred Options Joint Local Plan and the sites identified for allocation, it is necessary to consider the evidence informing the local plan process. For this reason, there is concern in relation to the extent to which this Neighbourhood Plan meets the basic conditions in its current form. You will also be well aware that PPG is clear<sup>1</sup> that '*the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested*'. What is not clear is how this Neighbourhood Plan has taken into account the emerging local plan for the District and the identified requirements and spatial strategy set out therein.

<sup>1</sup> PPG on Neighbourhood Planning paragraph 009 Reference ID: 41-009-20190509.

We trust that our comments above are helpful in setting out this Council's latest position with regards to housing numbers and we would be happy to answer any further questions you may have.

Yours sincerely

Robert Hobbs  
Corporate Manager – Strategic Planning  
Babergh & Mid Suffolk District Councils – Working Together

**Useful links:**

1. Report to Mid Suffolk Council dated 27 June 2019 on emerging Joint Local Plan:

<https://baberghmidsuffolk.moderngov.co.uk/documents/s15293/MC197.pdf>

2. Babergh & Mid Suffolk Infrastructure Delivery Plan (IDP) (July 2019):

<https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/BMSDC-IDP-July-2019-.pdf>

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