

Public Document Pack



PLANNING REFERRALS COMMITTEE	
DATE	Wednesday, 26 July 2017
PLACE	Council Chamber, Council Offices, Needham Market
TIME	2.30 pm

Please ask for: Committees@baberghmidsuffolk.gov.uk
Direct Line: 01449 724673
Email: Committees@baberghmidsuffolk.gov.uk

The Council, members of the public and the press may record/film/photograph or broadcast this meeting when the public and press are not lawfully excluded. Any member of the public who attends a meeting and objects to being filmed should advise the Committee Clerk.

A G E N D A

- | | | |
|----------|--|----------------|
| 1 | Apologies for absence/substitutions | <u>Page(s)</u> |
| 2 | To receive any declarations of pecuniary or non-pecuniary interest by Members | |
| 3 | Declarations of Lobbying | |
| 4 | Declarations of Personal Site Visits | |
| 5 | Questions by the Public | |

The Chairman to answer any questions from the public of which notice has been given no later than midday three clear working days before the day of the meeting in accordance with Committee and Sub-Committee Procedure Rule 7.

6 **Questions by Councillors**

The Chairman to answer any questions on any matter in relation to which the Council has powers or duties which affects the District and which falls within the terms of reference of the Committee, of which due notice has been given no later than midday three clear working days before the day of the meeting in accordance with Committee and Sub-Committee Procedure Rule 8.

7 RF/17/2 Schedule of planning applications

1 - 2

a 3506/16 Barking Road, Needham Market (Pages 3 - 132)

Notes:

1. The Council has adopted a Charter on Public Speaking at Planning Committee. A link to the Charter is provided below:

<http://babermidsuffolk.moderngov.co.uk/documents/s3945/Charter%20on%20Public%20Speaking%20at%20Planning%20Committee.pdf>

Those persons wishing to speak on a particular application should arrive in the Council Chamber early and make themselves known to the Officers. They will then be invited by the Chairman to speak when the relevant item is under consideration. This will be done in the following order:

- Parish Clerk or Parish Councillor representing the Council in which the application site is located
- Objectors
- Supporters
- The applicant or professional agent / representative

Public speakers in each capacity will normally be allowed 3 minutes to speak.

2. Ward Members attending meetings of Development Control Committees and Planning Referrals Committee may take the opportunity to exercise their speaking rights but are not entitled to vote on any matter which relates to his/her ward.

Members:

Councillor Kathie Guthrie – Chairman – Conservative and Independent Group Councillor
Councillor Matthew Hicks – Chairman – Conservative and Independent Group

Councillor Roy Barker - Vice Chairman - Conservative and Independent Group
Councillor Lesley Mayes - Vice Chairman - Conservative and Independent Group

Conservative and Independent Group

Councillors: Michael Burke
Gerard Brewster
David Burn
Julie Flatman
Jessica Fleming
Lavinia Hadingham
Barry Humphreys MBE
Diana Kearsley
John Levantis
Jane Storey
David Whybrow

Liberal Democrat Group

Councillors: John Field
Mike Norris

Green Group

Councillors: Anne Killett
Sarah Mansel
Keith Welham

Ward Members

Ward Members who are not Committee Members have the right to speak but not to vote on issues within their Wards.

Mid Suffolk District Council

Vision

“We will work to ensure that the economy, environment and communities of Mid Suffolk continue to thrive and achieve their full potential.”

Strategic Priorities 2016 – 2020

1. Economy and Environment

Lead and shape the local economy by promoting and helping to deliver sustainable economic growth which is balanced with respect for wildlife, heritage and the natural and built environment

2. Housing

Ensure that there are enough good quality, environmentally efficient and cost effective homes with the appropriate tenures and in the right locations

3. Strong and Healthy Communities

Encourage and support individuals and communities to be self-sufficient, strong, healthy and safe

Strategic Outcomes

Housing Delivery – More of the right type of homes, of the right tenure in the right place

Business growth and increased productivity – Encourage development of employment sites and other business growth, of the right type, in the right place and encourage investment in infrastructure, skills and innovation in order to increase productivity

Community capacity building and engagement – All communities are thriving, growing, healthy, active and self-sufficient

An enabled and efficient organisation – The right people, doing the right things, in the right way, at the right time, for the right reasons

Assets and investment – Improved achievement of strategic priorities and greater income generation through use of new and existing assets ('Profit for Purpose')

Suffolk Local Code of Conduct

1. Pecuniary Interests

Does the item of Council business relate to or affect any of your/your spouse /partner's pecuniary interests?

Yes

Declare you have a pecuniary interest

Leave the room. Do not participate or vote (Unless you have a dispensation)

Breach = criminal offence

No

No interests to declare

2. Non-Pecuniary Interests

Does the item of Council business relate to or affect any of your non-pecuniary interests ?

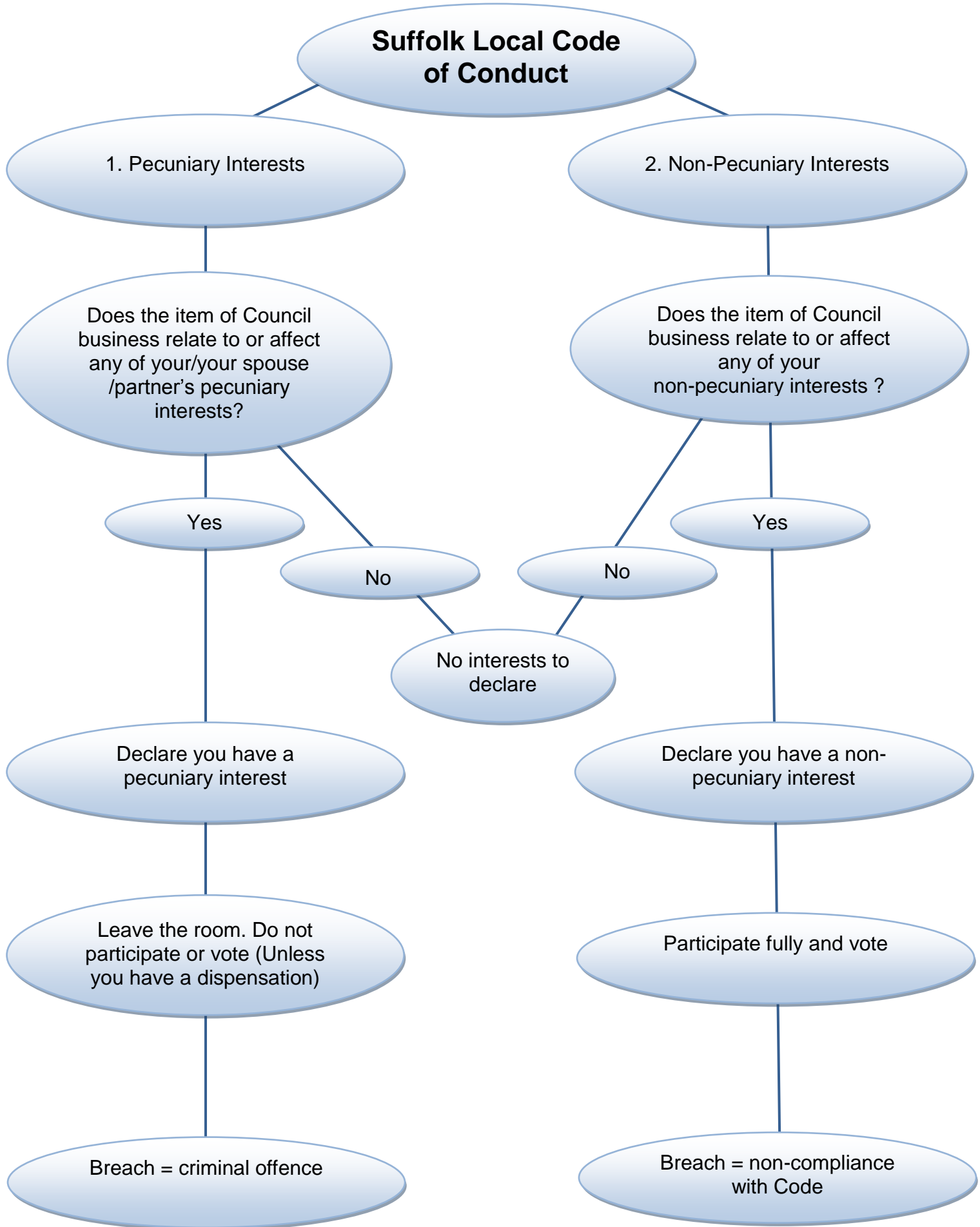
Yes

Declare you have a non-pecuniary interest

Participate fully and vote

Breach = non-compliance with Code

No



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Agenda Item 7

RF/17/2

MID SUFFOLK DISTRICT COUNCIL

PLANNING REFERRALS COMMITTEE

SCHEDULE OF APPLICATION FOR DETERMINATION BY THE COMMITTEE

26 JULY 2017

Item	Ref No.	Location And Proposal	Ward Member	Officer (Full)	Page No.
1.	3506/16	<u>Barking Road,</u> <u>Needham Market</u> Outline 152 Residential dwellings, vehicular access, open space and landscaping	Anne Killett, Wendy Marchant, Mike Norris	Sian Bunbury	3-132

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Agenda Item 7a

Committee Report

Committee Date: 26 July 2017

Item No: 1

Reference: 3506/16
Case Officer: Sian Bunbury

Description of Development: Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice

Location: Barking Road, Needham Market IP6 8HG

Parish: Barking, Needham Market

Ward: Barking & Somersham, Needham Market

Ward Members: Anne Killett, Wendy Marchant, Mike Norris

Site Area: 9.96ha

Conservation Area: No

Listed Building: None

Received: 15/08/2016 17:01:05

Expiry Date: 27/02/2017

Application Type: Outline Planning Permission

Development Type: Dwellings - Residential

Environmental Impact Assessment:

Applicant: Hopkins Homes Limited

Agent: Bidwells LLP

DOCUMENTS SUBMITTED FOR CONSIDERATION

List of applications supporting documents and reports :

Planning Application forms dated 15/08/16

Location Plan dwg.no. 001 received 15/08/16

Site Access Arrangement dwg.no. 002A

Site Access Layout dwg. no.SK101 rev A

Design and Access Statement
Planning Statement received 15/08/16
Statement of Community Involvement
Development Framework Plan
Illustrative Master Plan Rev A
Extended Phase 1 Habitat Survey
Phase 2 Ecological Surveys and Assessment
Flood Risk Assessment Revision A
Drainage Strategy Version B dwg.no. SK100/Rev B
Stormwater Maintenance Regime dated March 2017
Geophysical Survey Report received 15/08/16
Ground Investigation Report number 14333SI dated January 2016 received 15/08/16
Transport Assessment
Interim Residential Travel Plan Revised Revision A
Arboricultural Impact Statement including Tree Survey and Protection Plan dwg.no.1 Plans 1, 2 and 3
Landscape and Visual Impact Assessment received 15/08/16, including Landscape Strategy Acoustic Survey, Utilities Report
Archaeological Desk Based Assessment and Archaeological Evaluation Report dated January 2017

The application, plans and documents submitted by the Applicant can be viewed online via the following link:

<http://planningpages.midsuffolk.gov.uk/online-applications/>

Alternatively, a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

SUMMARY

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The officers recommend approval of this application.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason:

1. The application was considered at Development Control Committee B on 14 June and Members were minded to defer the application for a site visit (to be referred to Referrals Committee).

PART TWO – APPLICATION BACKGROUND

This section details history, policies, advice provided, other legalisation and events that form the background in terms of both material considerations and procedural background.

History

2. The planning history relevant to the application site is listed below. A detailed assessment of the planning history including any material Planning Appeals will be carried out as needed in Part Three:

Details of Previous Committee / Resolutions

- 3 The application was considered at Development Control Committee B on June 14th and Members were minded to defer the application for a site visit and referral to Referrals Committee.

Details of Member site visit

4. A site visit was held on July 19th.

Details of any Pre Application Advice

5. Pre-application meetings were held with MSDC Officers to agree the scope of the application and discuss the illustrative Master Plan and community involvement.

PART THREE – ASSESSMENT OF APPLICATION

Consultations

6. MSDC – Environmental Health (Noise/other). No objection providing mitigation measures relating to glazing and acoustic barrier are implemented.

MSDC – Environmental Health (Land Contamination). No objection

MSDC – Arboricultural Officer – No objection. Recommend conditions relating to Arboricultural Method Statement and Tree Protection Plan.

SCC – Archaeological Service. Recommend standard conditions

SCC Highways. PROW – No objection. There are no public rights of way either within or directly adjacent to the proposed development area. SCC may seek contributions for improvements to the network.

SCC Floods – Recommend conditions relating to submission of a surface water drainage scheme, a Sustainable Urban Drainage System (SUDS) and a construction surface water management plan.

SCC Natural Environment Team (Landscape) – A Landscape and Visual Assessment has been provided as part of the application and the Development Framework Plan suggests that some dwellings may be as high as 3 storeys. Effects on the characteristic arable land cover and widespread visual effects of a high magnitude could be reasonably minimised by robust mitigation. Suggest that dwellings should be a maximum of 2.5 storeys and suggests conditions relating to submission of hard and soft landscaping masterplan, management plan and Design Code.

Environment Agency – Original objection removed following receipt of an amended Flood Risk Assessment. The application should be assessed by MSDC in accordance with our remit.

Anglian Water – Will have capacity for flows. No comment re surface water management.

Suffolk Wildlife Trust – Following receipt of additional survey information regarding hazel dormouse recommend that habitat should be maximised. Require clarification on open space provision, which should be included as part of reserved matters, which should be based on up-to-date ecological survey information.

Place Services (Ecology) – Original objection withdrawn following receipt of additional information. The mitigation measures should be secured. A long term Landscape and Ecological Management Plan should be prepared and secured through condition. Recommends conditions relating to Biodiversity mitigation and enhancement, Landscape and Ecological Management Plan and Lighting Design.

SCC Highways – Additional information, specifically the clarification of traffic speeds, speed limit and achievable visibility splays at the proposed access, resolves the matters that led to an earlier recommendation of refusal.

Do not object subject to a S106 to its satisfaction, and conditions.

Recommended conditions in relation to:

Visibility, laying out and provision of vehicular access to B1078, discharge of surface water, details of estate roads and footpaths and their construction, details of storage and presentation of bins, details of manoeuvring and parking of vehicles, Construction Management Plan.

The applicant has agreed to construct a cycleway 3m wide along the site frontage from the access to the southern limits of the Health Centre. Onwards to Foxglove Avenue it would be 1.8m minimum.

Natural England – No objection. Operational lighting should be designed through a lighting strategy.

NHS England – The proposal will impact on a GP surgery. Acknowledge that the development will be liable for CIL charges. Is not clear whether the developer is proposing to deliver the new car park fully complete or supply the land. Needs further details. The existing GP practice does not have capacity to accommodate the additional growth and mitigation is required in accordance with the NPPF.

SCC Infrastructure – Seek contributions through CIL for primary school provision and libraries. Site mitigation required for passenger transport links and Public Rights of Way.

MSDC – Housing. No objection. Sets out required mix for 53 Affordable Houses.

Suffolk Police – Design out Crime – Comment re design and layout which can be explored at stage of Reserved Matters.

SCC Fire and Rescue – Recommend conditions for hydrant provision. Details to be provided via Building Regulations.

Needham Market Town Council – Object on the following grounds, and having expressed frustration over lack of dialogue, Local Plan or five-year Housing Land supply. The proposal should not be allowed to proceed in isolation of the longer term aspirations for the town.

- The sewerage and surface water systems may require a balancing pond.
- A roundabout at the Barking Road entrance would be advantageous.
- A pedestrian access should be included from the development onto Foxglove Avenue.
- Considerable concern whether the infrastructure of the town can cope with increase in residents, particularly the doctors' surgery and schools.
- The access road should be wide enough to allow a bus service.
- Parking control/restrictions should be included.

Barking Parish Council – Object

1. Part of the site lies within the Parish of Barking, which is in the ' countryside' designation of the Local Plan, and the development is a departure from the Local Plan as there are restricted facilities and services in the Parish.
2. The development will lead to a Parish boundary review.
3. The proposed development, including night time light pollution will have a negative impact on the visual character of the area. Most of the Parish is designated a Special Landscape Area.
4. The lack of a 5-year Housing Land Supply is allowing developers to ride roughshod over small countryside communities.
5. There is land available within the Needham Market boundary.
6. Barking Village Design Statement (2002) and Parish Plan (2011) are largely ignored as they refer to retaining the character of the landscape and village; respecting views in and out of the village, not making incursions into agricultural land and providing for limited housing need.
7. Concern of highway implications and assessment, volume and speed of traffic.
8. Wildlife habitats should be protected not lost forever.
9. Government guidelines to protect countryside, nature, wildlife and historic sites and buildings.

10. The development will relate to Needham Market rather than Barking and the Parish has been largely ignored by the developers.
11. There is a history of flooding in the locality and the 'dry' pond adjacent to the proposed surgery car park is a token.
12. The Doctors Practice has said that it can cope but where is the evidence. Cannot currently meet the needs of the community.
13. There is no strong case for a large housing development within Barking. Any new homes should be within the settlement boundary
14. Permission would inevitably lead to further development on adjacent land.
15. The application should not be dealt with in isolation from a long term strategy by Mid Suffolk District Council.

Representations

7. Summary of neighbour and 33 other representations

- The proposal will result in traffic congestion on local roads, including those leading to the A14 and A140 through the narrow railway bridge, and adding to traffic generated from the Chalk Quarry development (266 dwellings).
- The submitted traffic survey seems to largely relate to public transport. The noise generated from the volume of traffic has not been addressed.
- The roads are heavily used and there have been fatalities.
- There is no footpath from the proposed estate and Foxglove Avenue into Needham Market.
- Impact on local infrastructure: Doctors' Surgery, Schools and employment opportunities.
- Environmental issues: flooding – many houses in Foxglove Avenue have been flooded, and surface water has not been addressed. Wildlife: The Phase 1 Ecology Report is insufficient (Officer's note: a later Phase 2 Survey was submitted.) Archaeology: there is a lack of information to demonstrate mitigation.
- Overdevelopment as there is no pressing need for additional units on top of those in Needham Market which already have permission. Development is not needed on this agricultural field.
- The site is outside the Settlement Boundary.
- If allowed this development will erode the rural character and way of life of the character of Needham Market.
- Development should be on the Stowmarket side of Needham Market, towards the centre of employment.

Summary in support:

- The development will help to sustain shops in Needham Market, and houses are needed in walking distance, with improved links and widening of the footpath in Barking Road.
- Should be minimum 30% affordable housing.
- Redesign of the surgery car park and access onto the Barking Road.

The Site and Surroundings

8. The site is located on the south western edge of Needham Market and is partly within the parish of Barking. The site is in agricultural use and an area of woodland (protected by TPO) lies within the western part of the site, with a Special Landscape Area adjacent to the west and south. To the north of the site lies established housing and a Doctors Surgery. The site rises from the B1113 where a single access point is proposed, crossing a watercourse. An industrial sandblasting premises lies to the south of the site.

The Proposal

Please note details of the proposed development including plans and application documents can be found online.

9. The application is in outline for the construction of 152 dwellings with matters other than the vehicular access being reserved matters. A Development Framework indicates parameters for the scheme and an illustrative masterplan shows an indication of the possible layout and matters relating to appearance, layout, landscaping and scale. The proposal includes market and affordable homes, garages, parking, estate roads, public open space, play areas, landscaping and amenity green open space, sustainable drainage systems, with associated infrastructure including additional car parking and improved vehicular access to Needham Market Country Practice (the GP Surgery).

NATIONAL PLANNING POLICY FRAMEWORK

10. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.
 - Paragraph 6 - The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.
 - Paragraph 7- details the three roles of sustainable development as economic, social and environmental and that development should seek to provide enhancements to these roles.
 - Paragraph 8 - states that the three roles of sustainable development should be sought jointly and not in isolation.
 - Paragraphs 11-15 identify the presumption in favour of sustainable development.
 - Paragraph 17- lists the 12 core planning principles. Most notable are, that all development should secure high quality design, high level of amenity, support the transition to a low carbon future and actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

- Paragraph 32 and 34 necessitates that all decisions should take account of whether safe and suitable access to the site can be achieved for all people. The need to travel should be minimised and the use of sustainable transport should be maximised.
- Paragraph 47 seeks to deliver a wide choice of high quality homes.
- Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- Paragraph 55 sets out that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and not be considered isolated.
- Paragraph 56 to 60 - Good design is a key aspect of sustainable development is indivisible from good planning. Achieve high quality design which function well, establish strong sense of place, safe and visually attractive places.
- Paragraph 64 – Development of poor design must not be supported.
- Paragraph 69 - To promote healthy communities, clear and legible pedestrian routes and high quality public space.
- Paragraph 73 - Access to high quality open space.
- Paragraph 75 – Protection and enhancement of Public Rights of Way.
- Paragraphs 93 -103 identify the challenge of meeting climate change and flooding.
- Paragraphs 109,112, 118 and 119 The planning system should contribute to and enhance the natural and local environment and protect wildlife.
- Paragraph 123 – Planning and noise.
- Paragraph 183 – 185 Neighbourhood Plans.
- Paragraph 186 and 187 – Approaching decision taking in a positive way and looking for solutions rather than problems.

CORE STRATEGY

11. Summary of relevant policies Core Strategy 2008 and Core Strategy Focused Review:
- Policy CS1 "Settlement Hierarchy" sets out the distribution of housing across the district.
 - Policy CS2 "Development in the Countryside and Countryside Villages" defines the categories of development which may be supported in the countryside. This does not include new private market dwellings.
 - Policy CS4 "Adapting to Climate Change" details that development proposals will contribute to the delivery of sustainable development and to plan for climate change through addressing its causes and potential impacts in terms of flood risk, biodiversity and pollution.
 - Policy CS5 "Mid Suffolk's Environment" states that all development will maintain and enhance the environment and retain local distinctiveness of an area. It will protect and conserve landscape qualities.
 - Policy CS6 "Services and Infrastructure" states that new development will provide or support appropriate infrastructure.
 - Policy CS8 "Provision and Distribution of Housing"
 - Policy CS9 "Density and Mix" details that New housing development should provide a mix of house types, sizes and affordability.

- Policy FC1 "Presumption in favour of sustainable development" details that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- Policy FC1.1 "Mid Suffolk approach to delivering Sustainable Development" sets out that development proposals will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development. Proposals for development must conserve and enhance the local character of the different parts of the district.

NEIGHBOURHOOD PLAN / SUPPLEMENTARY PLANNING DOCUMENTS

12. The Barking Village Design Statement (2002) and Parish Plan (2011) refer to retaining the character of the landscape and village; respecting views in and out of the village, not making incursions into agricultural land and providing for limited housing need. Matters relating to the economy and highways are identified. The Design Statement has been adopted by MSDC as Supplementary Planning Guidance and is a Material Consideration in determining planning applications.

Needham Market Town Council are preparing a Neighbourhood Plan.

SAVED POLICIES IN THE LOCAL PLAN

13. Summary of policies in the Mid Suffolk Local Plan 1998:
- Policy GP1 "Design and layout of Development" sets out the design principles for all development in Mid Suffolk. Proposals should maintain or enhance the character and appearance of their surroundings and the site. Development should respect the scale and density of surrounding development, incorporate and protect important natural landscape features and make proper provision for parking in manner which does not dominate the appearance of the development.
 - Altered Policy H4 "A Proportion of Affordable Housing in new housing developments" development over 5 dwellings in the countryside shall provide up to 35% affordable units.
 - Policy H13 "Design and Layout of Housing Development" details that new housing development will be expected to achieve a high standard of design and layout and be of a scale and density appropriate to the site and its surroundings. It should respect the character of the site and the relationship with the surrounding area, not unduly affect amenities of neighbouring residents, have adequate privacy and private amenity, retain landscape features unless impracticable or unnecessary and provide satisfactory access to the highway network.
 - Policy H14- Encourage a variety of house types and designs to cater for different accommodation needs and to avoid undue uniformity.
 - Policy H15 "Development to Reflect Local Characteristics" states that new housing should be consistent with the pattern and form of development in the neighbouring area, the character of its setting, site constraints and the sites configuration including its natural features.

- Policy H16 “Protecting Existing Residential Amenity” details that the permission will be refused if the development will materially reduce the amenity and privacy of adjacent dwellings or erodes the character of the surrounding area.
- H17 “Keeping Residential Development Away From Pollution” states that residential development will be refused if affected by excessive traffic noise, or have significantly reduced amenity or safety by virtue of proximity to agricultural or industrial premises.
- CL2 “Development Within Special Landscape Areas” where care will be taken to safeguard landscape quality, and where development should be sensitively designed with high standards of layout, materials and landscaping.
- CL5 “Protecting Existing Woodland” states that development which would result in the loss or damage to woodland will be refused.
- CL6 “Tree Preservation Order “these will be used where removal of trees or woodland would be detrimental to visual amenity.
- CL8 “Protecting Wildlife Habitats” states that development will be refused where there is significant loss or alteration of habitats and where development is permitted the retention of important habitats will be sought.
- Policy T9 “Parking Standards” states that development proposals shall accord with the adopted parking standards
- Policy T10 “Highway Considerations in Development” details that regard will be given to the safe access to and egress from the site, suitability of existing roads for safe access and amount and type of traffic generated, adequate space for parking and turning cars within the site.
- RT4 “Amenity open space and play areas within residential development”
- RT12 “Footpaths and Bridleways” states that the footpath and bridleways network will be improved and modified.

Housing Land Supply

14. The National Planning Policy Framework (2012) (NPPF) requires local planning authorities to boost significantly the supply of housing, to achieve this a five-year housing land supply with an additional buffer, as set out in paragraph 47 of the framework, should be identified and maintained.
15. The local planning authority accepts that it cannot currently demonstrate a five year housing land supply in the district, as required by the NPPF. In these circumstances any adopted or emerging policy which can be considered to restrict the supply of housing land is considered 'out of date' in respect of paragraph 49 of the NPPF.
16. Paragraph 14 of the NPPF states that there is a presumption in favour of sustainable development. It says that where relevant policies are out of date, planning permission should be granted for development unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or where specific policies in the NPPF indicate development should be restricted. Specifically,

“another way of putting the matter is that the scales, or the balance, is weighted, loaded or tilted in favour of the proposal. This is what the presumption in favour of sustainable development means: it is a rebuttable presumption, although will only yield in the face of significant and demonstrable adverse impacts” (see CEBC vs SSCLG [2016] EWHC 571 (Admin)).

Officer’s Assessment and Main Considerations

17. From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.
18. The application is in outline, with the access being part of the proposal but all other matters reserved. In assessing the principle of the proposal the following are identified as the main considerations:

The Principle Of Development

19. Policy CS1 of the Core Strategy identifies a settlement hierarchy as to sequentially direct development, forming part of a strategy to provide for a sustainable level of growth. The Policy identifies categories of settlement within the district, with Towns representing the most preferable location for development, followed by the Key Service Centres, Primary then Secondary Villages. The Countryside is identified as the areas outside of those categories of settlement referred to above. Needham Market is identified as a Town which would be the main focus of development.
20. Policy CS2 of the Core Strategy restricts development in The Countryside to defined categories, including, rural exception housing, consisting of the following;
 - agricultural workers dwellings
 - possible conversion of rural buildings
 - replacement dwellings
 - affordable housing on exception sites
 - sites for Gypsies and Travellers and travelling showpeople
21. Policy H7 of the Local Plan seeks to restrict housing development in The Countryside in the interests of protecting its existing character and appearance.
22. The proposal site is located adjacent to the Settlement Boundary and therefore in The Countryside, where Policy CS1 and CS2 of the Core Strategy states that only development for rural exception housing will be permitted. The proposal does not represent rural exception housing for the purposes of the Core Strategy, whilst remaining inconsistent with Policy H7 of the Local Plan. Thereby, the erection of up to 152 dwellings on the site would, under normal circumstances, be contrary to the adopted development plan. However, these policies are considered out of date due to the current lack of a 5 year housing land supply as set out above.

23. It falls to the local planning authority as decision maker to assess the weight, if any, that should be given to the existing policies. Officers consider this assessment should, in the present application, have regard to factors including whether the policies continue to perform a material planning objective and whether it is consistent with the policies of the NPPF.
24. Policies CS1 and CS2 of the Core Strategy and H7 of the Local Plan form part of a suite of policies to control the distribution of new housing which can be afforded weight, since they contribute to ensuring that development is sustainably located and unsustainable locations are avoided. This planning objective remains important and is consistent with the NPPF presumption in favour of sustainable development, by limiting development in less sustainable locations with a limited range of services to meet the needs of new residents in a sustainable manner. However, in the absence of a five-year supply and subsequent demand for housing, Officers are of the view that these policies are afforded limited weight.
25. In this case, despite its location within the countryside, the proposal to develop a scheme of up to 152 dwellings outside of the settlement boundary of a Town is acceptable in principle, as detailed below. The balance in favour of sustainable development is assessed in the light of the impacts of the development and the appropriate mitigation and amelioration measures.

Sustainability Assessment Of Proposal

29. Paragraph 7 of the NPPF identifies three dimensions to sustainable development: economic, social and environmental considerations and indicates that planning should seek gains in relation to each element. These dimensions give rise to the need for the planning system to perform a number of roles:

- economic, contributing to building a strong economy and in particular by ensuring that sufficient land of the right type is available in the right places

- social, supporting, strong vibrant and healthy communities by providing the supply of housing required to meet future need in a high quality environment with accessible local services and

- environmental, contributing to the protection and enhancement of the natural, built and historic environment and mitigate and adapt to climate change

The dimensions of sustainable development, in the context of the proposed development, are assessed in detail below.

Economic

30. The provision of up to 152 dwelling houses will give rise to employment during the construction phase of the development. Furthermore, future occupiers of the development would be likely to use local services and facilities. Both factors will be of benefit to the local economy.

Social

Provision of New Housing

31. The development would provide a significant benefit in helping to meet the current housing shortfall in the district through the delivery of up to 152 additional dwellings, including 35% affordable housing provision. This would be in accordance with Altered Policy H4 of the Local Plan.
32. These social and economic benefits weigh in favour of the scheme and the wider matter of the sustainability of the site in terms of access to local services is discussed further below.

Environmental

Services and Facilities

33. Paragraph 55 of the NPPF seeks to promote sustainable development in rural areas advising 'housing should be located where it will enhance or maintain the vitality of rural communities', and recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby.
34. The site is located in the countryside; however, given that the site is adjacent to the Needham Market settlement boundary, the site has a good relationship to the town geographically and in relation to services/facilities.
35. A bus service is available that connects Needham Market to a number of settlements, including Ipswich and Stowmarket.
36. There are existing bus stops on Barking Road and Foxglove Avenue. Additionally, a Planning Obligation is sought, secured through a Section 106 Legal Agreement, to create pedestrian links and improve the existing bus stop by raised kerbs and passenger information.
37. The proposal includes the provision of a cycleway and footpath, secured by way of condition, to connect the site to the existing footpath network.
38. Given the above, Officers consider the proposal is located as to enable future occupiers access to services and facilities within Needham Market, whilst alternative methods of transport additional to the private car offer a sufficiently attractive alternative for occupiers of the proposed accommodation, consistent with the environmental and social dimensions of sustainable development contained within the NPPF.

Site Access, Parking And Highway Safety Considerations

39. Policy T10 of the Local Plan gives regard to a number of highway matters, including; the provision of safe access, the safe and free flow of traffic and pedestrian safety, safe capacity of the road network and the provision of adequate parking and turning for vehicles.

40. The Policy is supplemented by Policy T9 of the Local Plan, requiring proposals to provide areas of parking and manoeuvring in accordance with the parking standards adopted by the district.
41. Policies T10 and T9 are not policies relating to housing supply and are not therefore considered to be out of date.
42. Section 4 of the NPPF seeks the promotion of sustainable transport whilst paragraph 75 seeks to protect and enhance public rights of way and access.
43. Access details form part of the application and have been subject to consideration by SCC Highways. Additional information, specifically the clarification of traffic speeds, speed limit and achievable visibility resolves the matters that resulted in the earlier recommendation of refusal.
- The terminal signs for the speed limit on Barking Road are incorrectly located and should be approximately 25m to the south of the current location. The applicant has modified the location of the access road slightly to the north of the original proposed location which will provide visibility of 2.4m x 110m to the south of the access and 2.4m x 90m to the north. Traffic management works will be undertaken at the south end of the speed limit on the B1078 Barking Road, and a legal obligation will be entered into to reduce the speed limit between Needham Market and Barking.
- The applicant has agreed to construct a 3m wide cycleway along the site frontage from the new access road, southwards, with a 1.8m wide footway connecting to the existing network.
- An alternative internal highway layout would be achievable and is possible to accord with Manual for Streets.
- Other considerations relate to the provision of street lighting along Barking Road, the implementation of a Travel Plan, improvements to the Public Right of Way network all with a S106 contribution.

Design And Layout

44. An illustrative layout has been submitted but which only indicates a possible layout and housing mix. The layout is broadly acceptable and illustrates that the development of the dwellings with associated open spaces and landscaping, together with infrastructure and car parking can be accommodated without having a significant adverse impact on the character of the locality.

Landscape Impact

45. The site is on rising land with a small area of woodland on the western side of the site and is otherwise largely arable. The site abuts a Special Landscape Area. The loss of arable land will change the character of the area with widespread visual effects and changes to outlooks from adjoining dwellings, local roads and rights of way. A detailed Landscaping Masterplan would be required to minimise landscape and visual impacts and deal with hard and soft landscaping, ecological mitigation, open space and SUDS layout.

46. It is axiomatic that the introduction of development to an otherwise undeveloped parcel of agricultural land would cause some environmental harm, attributed to the urbanising effect on the landscape. However, given the above characteristics, it is considered that the sites contribution to the wider countryside or quality of the landscape is localised to immediacy of the site, whilst the proposal would be primarily viewed in the context of existing residential properties, mitigating the impact of the development. As such, the environmental harm arising from the development is not deemed to be significant.

Environmental Impacts - Trees, Ecology And Land Contamination

47. The Tree Officer has raised no objection but would require an Arboricultural method Statement and Tree Protection Plan to be submitted. Details of landscaping and additional planting would form part of an application for Approval of Reserved Matters.
48. The NPPF and Policy CS5 and statutory obligations on the Local Authority require the impact on ecology to be assessed. Whilst the works will result in impacts on important ecological features this can be made acceptable and will contribute to biodiversity net gain. Consultation responses have acknowledged the receipt of an Ecological Appraisal and recommend mitigation measures to be included in any conditions.
49. No objection has been raised by the Environmental Health team in response of Land Contamination.

Impact On Residential Amenity

50. Paragraph 17 of the NPPF sets out a number of core planning principles as to underpin decision-taking, including seeking to secure a good standard of amenity for all existing and future occupants of land and buildings.
51. Policy H13 of the Local Plan seeks to ensure new housing development protects the amenity of neighbouring residents.
52. The application is in outline only and therefore the layout plan submitted is for illustrative purposes. However, Officers consider, at this stage, that the site is capable of accommodating the amount of development proposed, without having a detrimental impact on the residential amenity of future occupiers of the proposal and neighbouring properties.

Flood Risk

53. The proposal is classified as 'more vulnerable' development in terms of flood risk vulnerability. The site lies within Flood Zones 1, 2 and 3 and access to and from the development crosses the watercourse and the area at highest risk of flooding. Accordingly an access bridge is proposed which would require consent from SCC. This development should not increase flood risk to the town, and ideally should reduce the risk of flooding.

54. A revised Flood Risk Assessment was submitted which enabled the Environment Agency to withdraw its original objection as the proposals site buildings and surface water attenuation areas within Flood Zone 1. Advice is given that flood evacuation should be assessed by the Local Authority.
55. Local objections have been received concerning local flooding, particularly of properties in Foxglove Avenue. SCC Flood Authority advise that the proposed development will help to improve the historic surface water flooding in the locality. Run-off will be diverted and conveyed through the site's surface water drainage balancing system in a controlled manner.

S106 Planning Obligations and CIL

56. The Community Infrastructure Levy is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area.
57. Mid Suffolk District Council adopted a CIL Charging Schedule On 21st January 2016 and started charging CIL on planning permissions granted from 11th April 2016. Mid Suffolk are required by Regulation 123 to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.
58. The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:
 - Provision of passenger transport
 - Provision of library facilities
 - Provision of additional pre-school places at existing establishments
 - Provision of primary school places at existing schools
 - Provision of secondary, sixth form and further education places
 - Provision of waste infrastructure
 - Provision of health facilities
59. Details of specific CIL contribution requirements which would form the basis of a future bid to the District Council, should planning permission be granted and implemented are as follows:

Education.

- The local catchment Primary School is Bosmere Community Primary School which is forecast to have no surplus places, although there are sufficient places at Stowmarket High School. An educational contribution of £3,045.25 per dwelling - £462,878.00 for the primary school is sought which would be reviewed at key stages of the application process.

Transport.

- Travel Plan, Evaluation and Support Contribution of £1,000 per annum for minimum of five years or one year after occupation, whichever is the longest. Travel Plan Implementation Bond, or cash deposit of £102,339 (£673 per dwelling).
- Off-site improvements to the Public Right of Way network will require a contribution of £46,563.00 which should be index linked and any unspent balance repayable after 5 years from the date of payment.
- Creating pedestrian links to bus stops and improving existing bus stops £5,000 and providing two Real Time Passenger Information Screens £20,000.

Libraries. £216.00 per dwelling - £32,832.00

Health facilities.

NHS England have confirmed the proposed development is likely to have an impact on the services of the GP Practice operating nearby which does not have capacity for the additional growth resulting from this development. It is acknowledged that the proposed development will be liable for CIL and would form the basis of a future bid to the District Council for CIL funds.

60. The above are considered to fall within the Councils CIL 123 list. As such, these infrastructure improvements should be dealt with by a future bid for CIL funds.

61. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations, including where tariff style charges are sought, may only constitute a reason for granting planning permission if they meet the tests, as set out in The Community Infrastructure Levy Regulations 2010. The tests comprise the following:

- that they are necessary to make the development acceptable in planning terms,
 - directly related to the development,
 - and fairly and reasonably related in scale and kind.
- Suffolk County Council have set out requests for Planning Obligations to be secured through a s106 agreement. Comprising the following:
- Travel Plan, Evaluation and Support Contribution of £1,000 per annum for minimum of five years or one year after occupation, whichever is the longest. Travel Plan Implementation Bond, or cash deposit of £102,339 (£673 per dwelling).
 - Off-site improvements to the Public Right of Way network will require a contribution of £46,563.00 which should be index linked and any unspent balance repayable after 5 years from the date of payment.
 - Creating pedestrian links to bus stops and improving existing bus stops £5,000 and providing two Real Time Passenger Information Screens £20,000.
 - Obtaining a legal Order to reduce the speed limit between Barking and Needham Market and to implement the Order £10,000.

Officers consider that the sum meets the tests for obligations set out in The Community Infrastructure Levy Regulations, and thereby recommended the obligation be secured through a Section 106 Legal Agreement.

62. In accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured by way of a planning obligation deed are (a) necessary to make the Development acceptable in planning terms (b) directly related to the Development and (c) fairly and reasonably relate in scale and kind to the Development.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

63. The scheme would result in housing subject to both CIL and council tax.

PART FOUR – CONCLUSION

Planning Balance

64. The proposal site is within the countryside, where Policy CS1 and CS2 of the Core Strategy states that only development for rural exception housing will be permitted. The proposal does not represent rural exception housing for the purposes of the Core Strategy, whilst remaining inconsistent with Policy H7 of the Local Plan. Thereby, the residential development of the site for up to 152 dwelling would, under normal circumstances, be contrary to the adopted development plan.
65. However, Officers recognise that the aforementioned policies are currently considered out of date, and that the application therefore needs to be determined in accordance with paragraph 14 of the National Planning Policy Framework, with the presumption in favour of sustainable development, approving development unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
66. In this case the adverse environmental impact, associated with the introduction of development to an otherwise undeveloped parcel of agricultural land, does not significantly and demonstrably outweigh the benefits of the development, including the significant benefit in helping to meet the current housing shortfall in the district, as well as the social and economic benefits and support for local services. The proposal would thereby represent sustainable development and should be granted in accordance with the presumption in favour of sustainable development.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

67. When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising.
68. In this case the planning authority has received amended information and furthered consultation to resolve issues particularly those in relation to biodiversity, flooding and highways.

Identification of any Legal Implications of the decision

69. It is not considered that there will be any adverse Legal Implications for planning consideration should the decision be approved.
70. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following have been considered in respect of the proposed development.
- Human Rights Act 1998
 - The Equalities Act 2010
 - Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
 - Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
 - The Conservation of Habitats and Species Regulations 2010
 - Localism Act
 - Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

(1) That the Corporate Manager for Growth and Sustainable Planning be authorised to secure a planning obligation under Section 106 of the Town and Country Planning Act, 1990, to provide:-

- 35% Affordable Housing
- Requirements as identified by SCC Highways
- Provision of open space
- Provision of car park

(2) That, subject to the completion of the Planning Obligation in Resolution (1) above, the Corporate Manager for Growth and Sustainable Planning be authorised to grant Planning Permission subject to conditions including: -

- Time limit for reserved matters (standard)
- Definition of reserved matters
- Approved plans
- Quantum of residential development fixed to a maximum of 152 no. dwellings
- Noise assessment – implementation of mitigation measures.
- Details of surface water drainage scheme
- Details of implementation, maintenance, and management of surface water drainage scheme
- Details of sustainable urban drainage system
- Details of construction surface water management
- Programme of archaeological investigation and post investigation assessment
- Fire hydrant provision details
- Details of ecological survey, biodiversity mitigation and enhancement measures
- Development to be completed in accordance with ecology details
- Details of lighting design

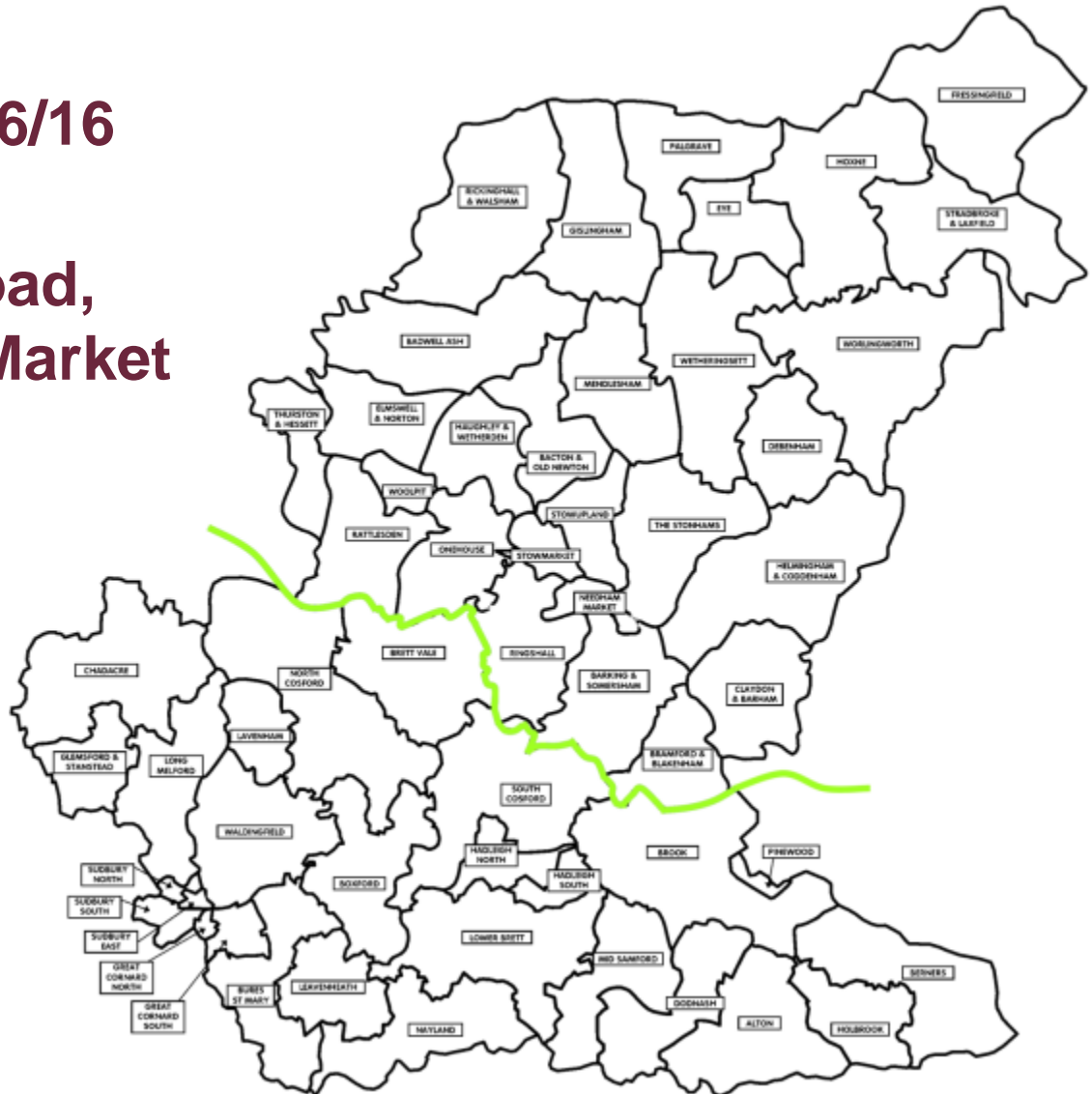
- External facing materials details
- Submission of hard and soft landscaping masterplan
- Submission of Arboricultural Method Statement including tree protection measures
- Details of Landscape and Ecology Management Plan including maintenance of public open space
- Details of design code with dwellings a maximum of 2.5 storeys
- Details of the proposed access and layout
- Requirements for visibility
- Parking, maneuvering, and cycle storage details
- Details of a construction management plan
- Details of the areas to be provided for storage of refuse/recycling
- Surface water disposal details
- Estate roads and footpaths details and implementation requirements
- Construction of carriageways and footways prior to occupation

(3) That, in the event of the Planning Obligation referred to in Resolution (1) above not being secured the Corporate Manager - Growth and Sustainable Planning be authorised to refuse Planning Permission, for reason(s) including:-

- Inadequate provision of infrastructure contributions which would fail to provide compensatory benefits to the sustainability of the development and its wider impacts, contrary to the development plan and national planning policy.

Application No: 3506/16

**Address: Barking Road,
Needham Market
IP6 8HG**





Verbal Updates:

- Confirmation and summary of any 3rd Party representations received not previously issued to members.
- Confirmation and summary of any consultee responses received not previously issued to members
- Confirmation of any changes to recommendation, conditions or reasons.

Site Location Plan



Notes
 Do not scale from this drawing to ascertain dimensions.
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 A 100/17 - Revised site access location



PLANNING

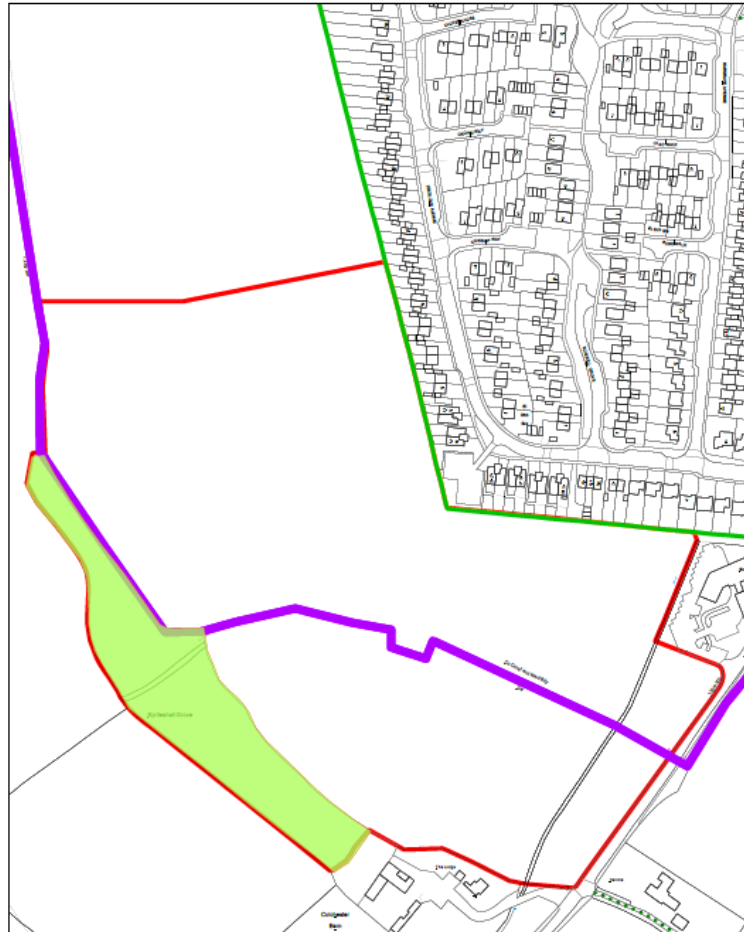
Project	Site No.
Starking Road, Newcham Market	302 A
Drawn	Scale
Site Access Arrangement	1:2500 @ A3
File Number	Drawn By: [Name] Checked By: [Name]


**HOPKINS
HOMES**

MULTI-FAMILY RESIDENTIAL DEVELOPMENT
 APPROVAL ONLY
 TEL: 01206 466611 FAX: 01206 198601

Constraints map

Slide 4



<p>Title: Constraints Reference: 3506/16 Site: Barking Road Needham Market</p>		<p>SCALE 1:2500</p>	
 <p>MID SUFFOLK DISTRICT COUNCIL 131, High Street, Needham Market, IP6 8DL Telephone : 01449 724500 email: customerservice@csduk.com www.midsuffolk.gov.uk</p>		<p>Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2017 Ordnance Survey Licence number 100017810 Date Printed : 12/07/2017</p>	

Aerial Site Photo

Slide 5

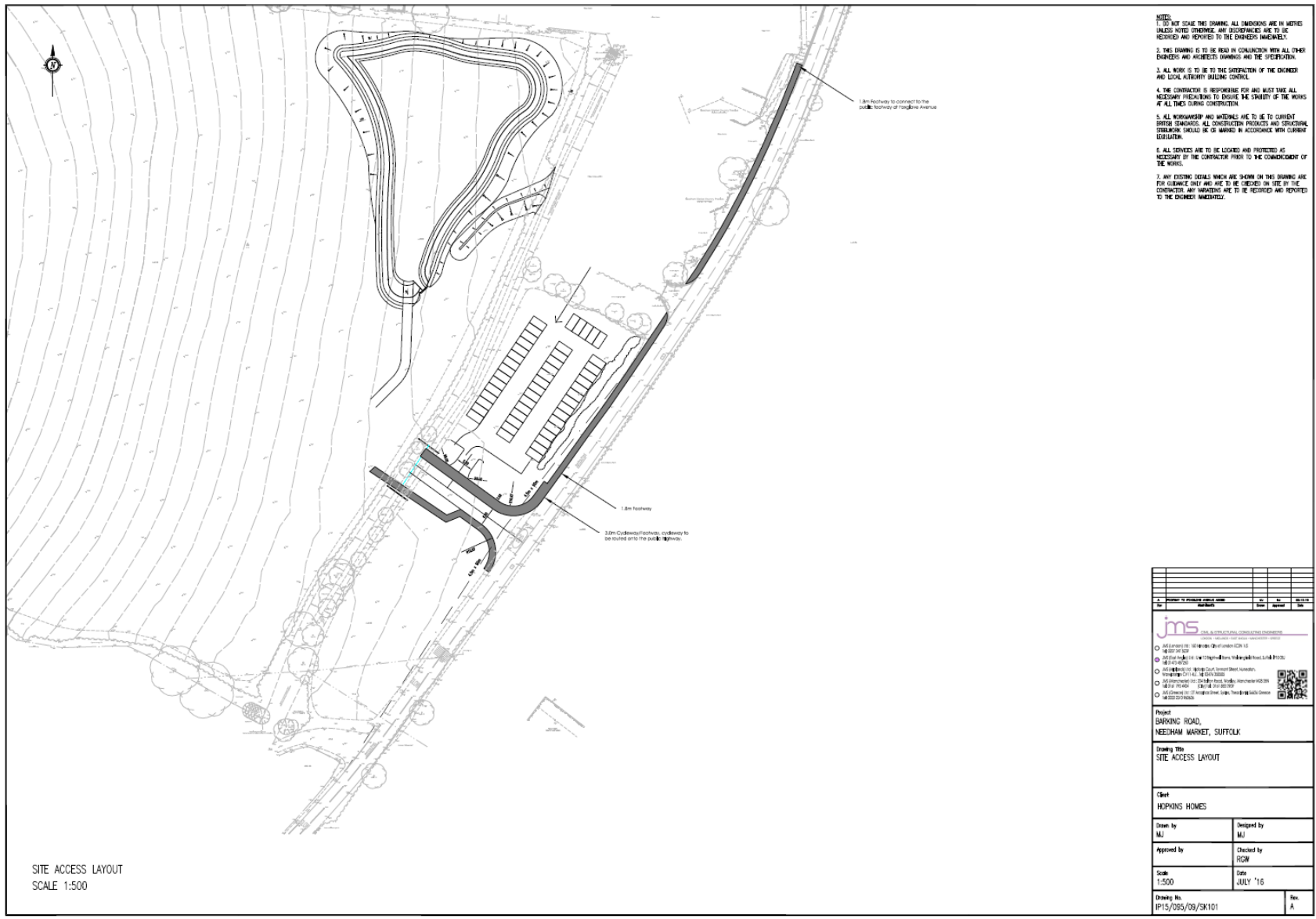
Page 27



<p>Title: Aerial View Reference: 3506/16 Site: Barking Road Needham Market</p>	
	<p>MID SUFFOLK DISTRICT COUNCIL 131, High Street, Needham Market, IP9 8DL. Telephone : 01449 724300 email: customer.service@csd.suffolk.gov.uk www.midsuffolk.gov.uk</p>
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Site Access Plan

Page 28



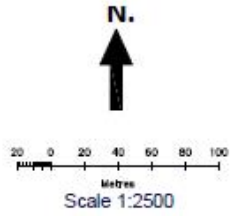
Illustrative Master Plan

Slide 7

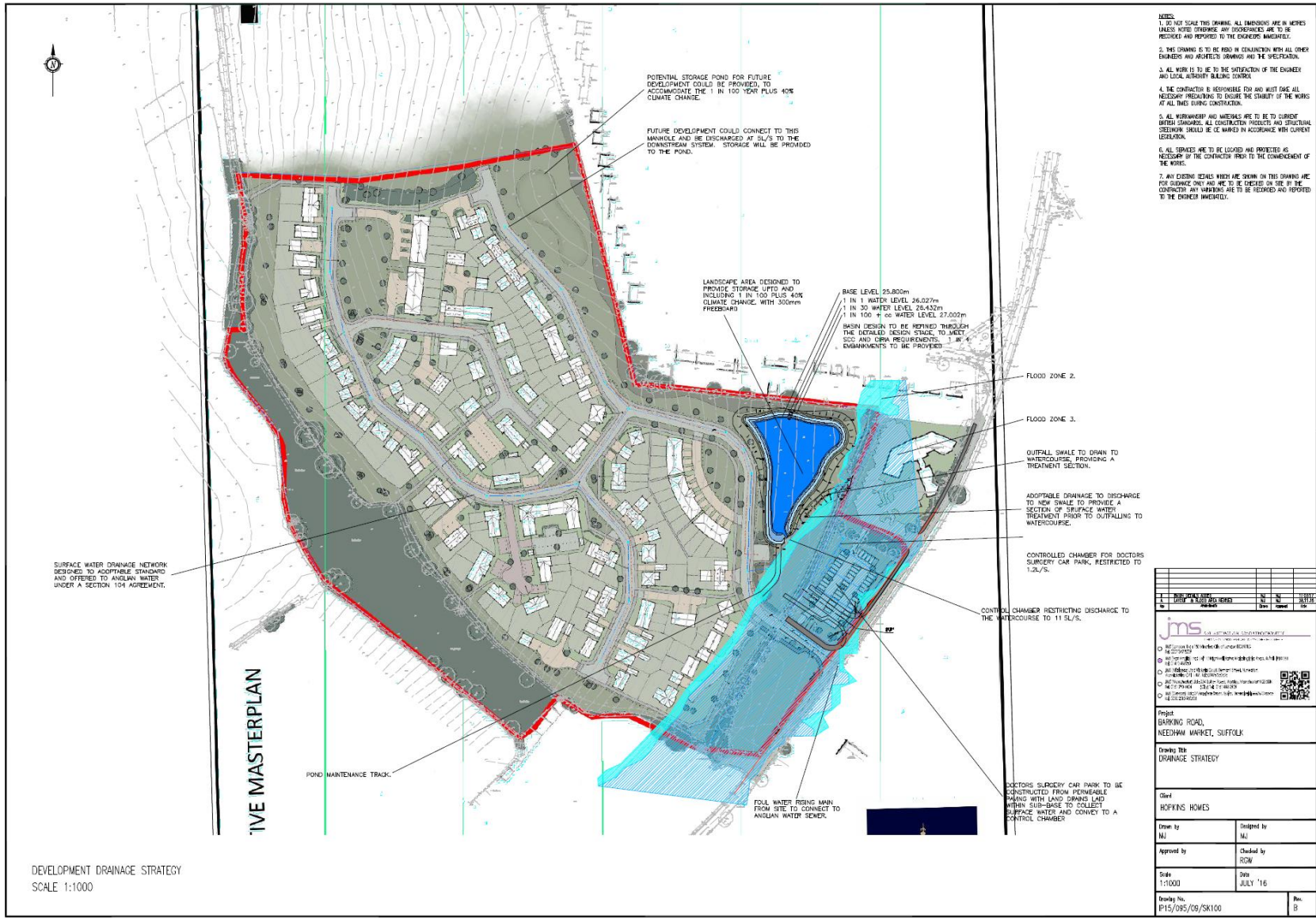
Page 29



Barking Road, Needham Market, Suffolk



- ### Key
- Site Boundary
 - New Tree Planted Belt
 - Existing Woodland
 - Indicative Drainage Basins
 - Main Access off Barking Road
 - Proposed Pathways
 - Indicative Main Street
 - Indicative Secondary Street
 - Proposed Public Open Space
 - Potential Footpath Links
 - Proposed Extension to Doctors Surgery Carpark
 - Existing Residential Development
 - Potential Location of Foul Water Pump Station
 - Planted Buffer to Northern Boundary
- ### STOREY HEIGHTS
- Possible 1 - 1.5 Storey Development
 - Possible 2 Storey Development
 - Possible 2.5 - 3 Storey Development



1. DO NOT SCALE THIS DRAWING. ALL DIMENSIONS ARE IN METRES UNLESS NOTED OTHERWISE. ANY DISCREPANCIES ARE TO BE IGNORED AND REPORTED TO THE ENGINEER IMMEDIATELY.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER ENGINEERS AND ARCHITECTS DRAWINGS AND THE SPECIFICATION.
3. ALL WORK IS TO BE TO THE SATISFACTION OF THE ENGINEER AND LOCAL AUTHORITY BUILDING CONTROL.
4. THE CONTRACTOR IS RESPONSIBLE FOR AND MUST TAKE ALL NECESSARY PRECAUTIONS TO ENSURE THE SAFETY OF THE WORKS AT ALL TIMES DURING CONSTRUCTION.
5. ALL WORKMANSHIP AND MATERIALS ARE TO BE TO CURRENT BRITISH STANDARDS. ALL CONSTRUCTION PRODUCTS AND STRUCTURAL STEELWORK SHOULD BE GR MARKED IN ACCORDANCE WITH CURRENT LEGISLATION.
6. ALL SERVICES ARE TO BE LOCATED AND PROTECTED AS NECESSARY BY THE CONTRACTOR PRIOR TO THE COMMENCEMENT OF THE WORKS.
7. ANY EXISTING SERVICES WHICH ARE SHOWN ON THIS DRAWING ARE FOR GUIDANCE ONLY AND ARE TO BE CHECKED ON SITE BY THE CONTRACTOR. ANY VARIATIONS ARE TO BE REPORTED AND REPORTED TO THE ENGINEER IMMEDIATELY.

Project: BARKING ROAD, NEEDHAM MARKET, SUFFOLK	
Drawing Title: DRAINAGE STRATEGY	
Client: HOPKINS HOMES	
Drawn by: MJ	Designed by: MJ
Approved by: RDM	Checked by: RDM
Date: 11/10/20	Date: JULY '16
Drawing No: P15/095/09/SK100	Rev: 8

Tree Survey map 1 of 3



Tree Survey map 2 of 3

Slide 12



Map

- Green circle: Existing trees
- Red circle: Trees to be planted
- Blue circle: Trees to be removed
- Yellow circle: Trees to be preserved
- Orange circle: Trees to be protected
- Grey circle: Trees to be replaced
- Black circle: Trees to be removed
- White circle: Trees to be preserved

Legend

- Red line: Boundary
- Yellow line: Boundary
- Blue line: Boundary
- Orange line: Boundary
- Grey line: Boundary
- Black line: Boundary
- White line: Boundary

Scale

1:1000

Navigation

Home | Back | Forward | Stop

Map Information

Map created by: [Name]

Map date: [Date]

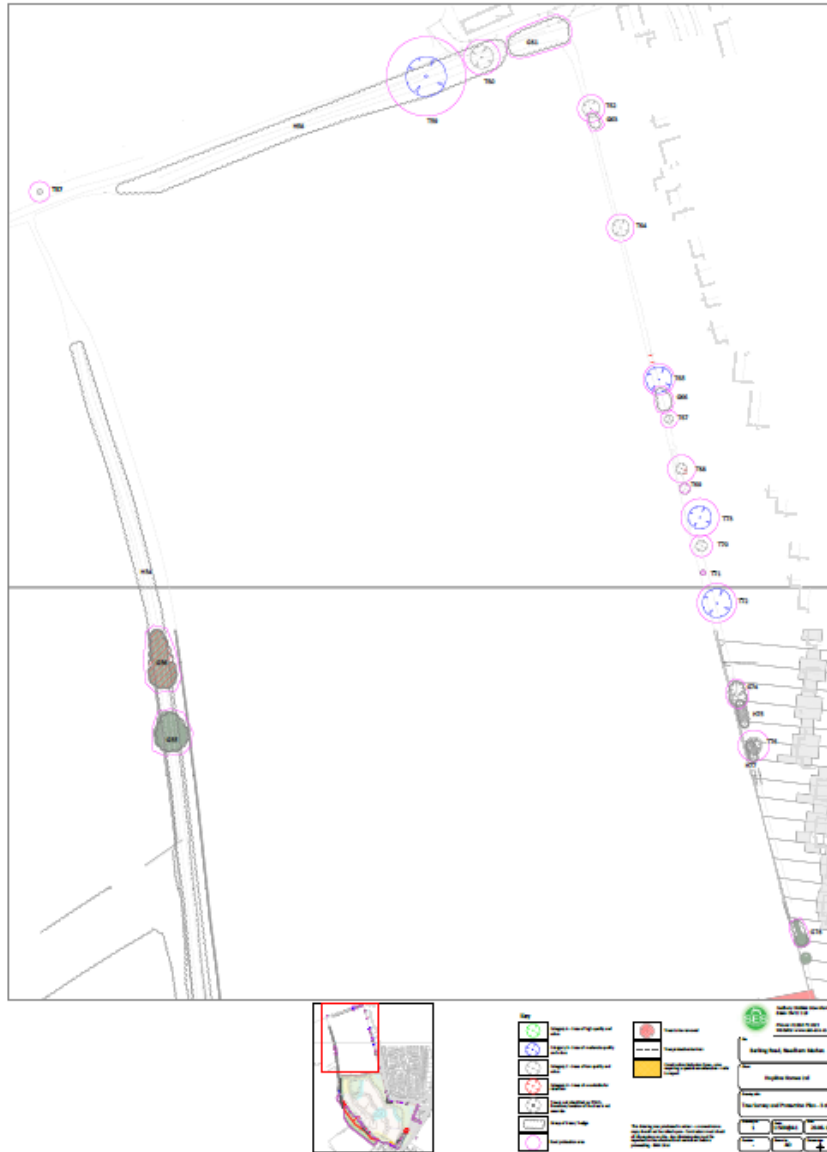
Map scale: [Scale]

Map projection: [Projection]

Map data: [Data Source]

Tree Survey map 3 of 3

Slide 13





Final Summary

- Updates since writing the report
- Conclusions and Key Material Points
- Any further details around Recommendation, Conditions and Obligations.

Recommendation from Officers is for *Approval* as detailed within report.

From: David Harrold
Sent: 26 August 2016 15:27
To: Planning Admin
Cc: Lisa Evans
Subject: Plan ref 3506/16/OUT Barking Road, Needham Market

Thank you for consulting me on the above outline application for the construction of 152 residential dwellings.

I do not have any objection in principle to the development but would recommend a noise assessment is carried out in respect of road traffic in Barking Road and commercial activity at Sandblast Signs Company (SSC) at The Lodge, Needham Road, Barking.

A noise assessment would need to have regard to guidance on community noise published by the World Health Organisation, British Standard 8233 for internal noise levels in dwellings and BS 4142 for the impact of commercial and industrial noise. It will inform on whether there are significant adverse impacts and appropriate mitigation measures. Such measures may include the layout and design of dwellings, noise barriers and acoustic insulation to house facades.

Should outline approval be given, I would recommend that this is made conditional upon carrying out such a noise assessment.

Reason: To avoid and mitigate any significant adverse impacts of noise on the future occupiers and habitation of the proposed dwellings.

David Harrold MCIEH

Senior Environmental Health Officer
Babergh and Mid Suffolk Council

From: Nathan Pittam
Sent: 30 August 2016 15:31
To: Planning Admin
Subject: 3506/16/OUT. EH - Land Contamination.

M3 183059
3506/16/OUT. EH - Land Contamination.
SH, Street Record, Barking Road, Needham Market, IPSWICH, Suffolk.
Outline planning permission with vehicular access (all other matters reserved)
for the construction of 152 residential dwellings (including market and
affordable homes) garages, parking, vehicular ...

Many thanks for your request for comments in relation to the above application. I have reviewed the application and supporting documents and can confirm that I have no objection from the perspective of land contamination to the proposed development. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together

From: David Pizzey
Sent: 31 August 2016 11:50
To: Lisa Evans
Cc: Planning Admin
Subject: 3506/16 Barking Road, Needham Market.

Lisa

I have no objection to this application at this stage as there appears to be little conflict between the development, based upon the landscape strategy plan, and any significant trees/hedges on or adjacent to the site. I am pleased to note separation between the woodland along the western boundary and the residential element of the design in order to help avoid any undue pressure or detrimental impact to this important natural feature. Should the layout design remain unaltered and you are minded to recommend approval of the scheme we will require a detailed Arboricultural Method Statement and Tree Protection Plan but this can be dealt with under condition if necessary.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@babergmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Rachael Abraham
Direct Line: 01284 741232
Email: Rachael.abraham@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_3506
Date: 1 September 2016

For the Attention of Lisa Evans

Dear Mr Isbell

Planning Application 3506/16– Barking Road, Needham Market: Archaeology

The large proposal affects an area of very high potential recorded in the County Historic Environment Record. Within the site itself, scatters of finds dating from the Bronze Age to the post-medieval period have been recorded. Historic Maps also show that the now demolished Sprites Hall once stood within this site. Surrounding the proposed development area, significant scatters of multi-period finds have also been recorded (BRK 043, 044, 045, 046, 088 and 105), as well as a pit containing Roman building material (BRK 106). As a result there is very high potential to encounter archaeological remains at this location and the proposed development will involve groundworks which will damage or destroy any surviving archaeology.

Given the high potential, lack of previous investigation and large size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site before a Development Brief is prepared, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework as is consistent with the advice provided to the applicant during pre-application consultations.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should there be any below-ground archaeological finds of significance, will be based upon the results of the evaluation.

In this case, an archaeological evaluation will be required to establish the potential of the site. The results of the evaluation must be presented with any application submitted for the site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important archaeological remains within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation. Please see our website for further information on procedures and costs: <http://www.suffolk.gov.uk/archaeology>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

From: Rachael Abraham
Sent: 25 November 2016 09:27
To: Lisa Evans
Cc: Planning Admin; Myk Flitcroft
Subject: RE: Planning Application 3506/16– Barking Road, Needham Market: Archaeology

Dear Lisa,

A first phase of archaeological evaluation, consisting of geophysical survey and low level trial trenching, has now been undertaken at this site as we requested. Whilst the report for the trial trenching is currently in production, I visited the site last week in order to review the results. A number of archaeological remains have been encountered, particularly in the northern half of the site, however, no remains have been identified which warrant preservation in-situ. My updated advice in relation to this application is therefore as follows:

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed

In this case the following two conditions, used together, would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of

Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

In this instance, a second phase of archaeological evaluation is required, followed by mitigation as appropriate.

I would be happy to issue a brief outlining the ongoing work which is required, on request of the applicant.

Best wishes,
Rachael

Rachael Abraham
Senior Archaeological Officer

Suffolk County Council Archaeological Service,
Bury Resource Centre,
Hollow Road,
Bury St Edmunds,
IP32 7AY

Tel.: 01284 741232
Mob: 07595 089516
Email: rachael.abraham@suffolk.gov.uk

Website: www.suffolk.gov.uk/archaeology
Suffolk Heritage Explorer: www.heritage.suffolk.gov.uk
Twitter Page: www.twitter.com/SCCArchaeology

From: Rachael Abraham
Sent: 01 September 2016 12:57
To: Lisa Evans <Lisa.Evans@baberghmidsuffolk.gov.uk>
Cc: 'planningadmin@midsuffolk.gov.uk' <planningadmin@midsuffolk.gov.uk>
Subject: Planning Application 3506/16– Barking Road, Needham Market: Archaeology

Dear Lisa,
Please find attached our advice in relation to the above planning application.
Best wishes,
Rachael

Rachael Abraham
Senior Archaeological Officer

Suffolk County Council Archaeological Service,
Bury Resource Centre,
Hollow Road,
Bury St Edmunds,
IP32 7AY

Tel.: 01284 741232

Mob: 07595 089516
Email: rachael.abraham@suffolk.gov.uk

From: Chris Ward
Sent: 01 September 2016 11:59
To: Lisa Evans
Cc: Planning Admin; Christopher Fish
Subject: RE: Consultation on Planning Application 3506/16

Dear Lisa,

Thank you for notifying me about the application for the proposed residential development off Barking Road in Needham Market. I will have some comments to make in regards to the Travel Plan that was submitted to support the application; however they will be included as part of the formal Suffolk County Council Highway response to comply with internal protocol.

If this causes you any issues please let me know as soon as possible.

Kind regards

Chris Ward
Travel Plan Officer
Development Management
Resource Management
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
Telephone: 01473 264970
email : chris.ward@suffolk.gov.uk
web : <http://www.suffolk.gov.uk>

From: RM PROW Planning
Sent: 02 September 2016 15:54
To: Planning Admin
Cc: Christopher Fish
Subject: RE: Consultation on Planning Application 3506/16

Our Ref: W408/ROW603/16

For The Attention of: Lisa Evans

Public Rights of Way Response

Thank you for your consultation concerning the above application.

This response deals only with the onsite protection of affected PROW, and does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, SCC may be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

There are no public rights of way either within or directly adjacent to the proposed development area.

We have **no objection** to the proposed development.

Regards

Jackie Gillis
Green Access Officer
Access Development Team
Rights of Way and Access
Resource Management, Suffolk County Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

[Ⓞ http://publicrightsofway.onesuffolk.net/](http://publicrightsofway.onesuffolk.net/) | [Report A Public Right of Way Problem Here](#)

Your Ref: MS/3506/16
Our Ref: 570\CON\2892\16
Date: 21 November 2016
Highways Enquiries to: christopher.fish@suffolk.gov.uk



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

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

For the Attention of: Ms L. Evans

Dear Lisa,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/3506/16**

PROPOSAL: Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice

LOCATION: Site at, Barking Road, Needham Market, Suffolk

ROAD CLASS: B1078

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

The application does not show that the proposed access from Barking Road would have an adequate visibility splay to the south for safe vehicular access. This is contrary to National Planning Policy Framework paragraph 32.

Comment:

NPPF paragraph 32 states: ... *Plans and decisions should take account of whether:*

- (1) the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- (2) safe and suitable access to the site can be achieved for all people; and*
- (3) improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

Taking each point in turn:

(1) According to records held in this office, footway access (at only 1.8m not 2.0m minimum recommended by Manual for Streets) can be provided via Barking Road to Foxglove Avenue. This route would give access to the primary school and the town centre. It would be over 20 minutes walking time for primary school children to the nearest primary school and a similar time to the town centre.

There is a case, therefore, for requiring off-carriageway improvements for cycling, due to the walking distance from the town centre and the primary school, which would be considerably more than the 800m maximum 'acceptable' walking distance noted in para 3.12 of the TA. The developer can provide a shared footway/cycletrack between a point well within the site to the site boundary abutting the medical practice entrance. Ideally, this would be extended to Foxglove Avenue but contrary to the TA's findings this would require agreement from the Country Medical Practice site owner and a pinch point at No. 1 Foxglove Avenue would remain. It is likely that people will cycle along the footway due in part to the speed of traffic on Barking Road.

There is currently an hourly bus service (No. 88) serving the south of Needham Market along Foxglove Avenue (but no further south) going to Ipswich and Stowmarket. There is no reasonable prospect that services will route closer. According to the illustrative masterplan, the proposed dwellings would be at least 350m and up to 710m from the bus stop on Foxglove Avenue. The TA states that 640m is considered to be the usual maximum 'convenient' walking distance, therefore several dwellings would most likely be beyond this distance. Many dwellings would be beyond 400m, which is the usual urban target maximum distance. It would be much better for all if a pedestrian/ cycling access directly from Foxglove Avenue were to be provided but this isn't within the applicant's control. The nearest existing bus stops don't have wheelchair user friendly raised kerbs, shelters or real time passenger information. It is recommended, therefore, that a new stop be provided with a shelter and RTPi screen on Foxglove Avenue, near to Barking Road, so passengers don't have to cross a road. This would require the removal of part of the layby fronting numbers 5, 7 & 9 Foxglove Avenue, which all have off street parking.

Whereas, the poor bus stop infrastructure is arguably a matter the District Council could address through CIL funding, the lack of scheduled bus services connecting the site to major employment areas for a typical 9am to 5pm shift, the long distance to the nearest bus stops (if a new stop cannot be agreed), local amenities and primary school and the lack of off-carriageway cycle facilities, the sustainable transport credentials of the site are debatable.

(2) No evidence has been presented to show that vehicle speeds are sufficiently low as to make this adequate for safe access to be achieved. The application proposes visibility splays of 4.5m by 90m along Barking Road in each direction but, as the access is over 90m south of the built edge of the town and located at the change in speed limit between 30mph and National Speed limit, it is considered that a standard y-distance of 215m should be provided to the south. At an acceptable x-distance of 2.4m the maximum y-distance to the south at the proposed location is approximately 137m. 90m may be adequate to the north. Relocating the access to a minimum 40m from the busy medical centre access could achieve 157m y-distance to the south, which may be adequate subject to speed survey.

The County Council has a speed limit policy¹ and it is not possible to provide any assurance that a reduced speed limit further south would be agreed to accord with the available visibility. Indeed, the illustrative masterplan suggests that continuous frontage development would not be created, which is an important consideration for introduction of 30mph speed limits in Suffolk so it is considered most unlikely that the speed limit would change.

An adequate footway appears to be feasible between the site access to Foxglove Avenue on the west side of Barking Road. This would be necessary to achieve safe access for pedestrians.

The Suffolk Design Guide (para. 3.3.8) says, '*For major access roads serving more than 150 and up to 300 dwellings... (b) that where only one point of access is available the road layout should form a circuit and there should be the shortest practicable connection between this circuit and the point of*

1

<https://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Roads%20and%20Pavement/s/2015.07.23-Speed-Limit-Policy.pdf>

access. This should always form the stem of a T-junction usually with a local distributor road.' The stem can be no less than 60m if the access is from Barking Road. This is reasonable but the illustrative masterplan does not provide any loops, as recommended by the current advice in Manual for Streets. If nothing else, this means refuse collection vehicles will need to reverse more than necessary. Manual for Streets para. 6.7.3 notes that fire services assess the risk of obstruction of a single access and it is recommended that Suffolk Fire and Rescue are consulted on this point. Alternative internal layouts that would guard against such risk and allow for maintenance of the road are possible given the dimensions of the site.

(3) Manual for Streets recommends a minimum footway width of 2m and this can be delivered along Barking Road within the site frontage. It would require the agreement of the medical practice site owner to achieve this along that frontage.

Street lighting should be provided along Barking Road to the site access if approved for road safety and sustainable access reasons

The TA refers to NPPF paragraph 35. As mentioned above, it is debateable whether the bus service is 'good' and access to it isn't good for disabled people, especially if it means having to cross Barking Road or wheel uphill to the stops in Foxglove Avenue.

It may be appropriate to establish home zones within the development and facilities to charging electric vehicles should be provided as encouraged by NPPF paragraph 35.

NPPF para. 36 says, 'A key tool to facilitate this [the objectives of para. 35] will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.'

Travel Plan (comments based on the Interim Residential Travel Plan (IRTP) dated 27 July 2016).

The Travel Plan has identified a target to achieve a 50% modal share of single-occupancy vehicle travel, based on a reduction of the Needham Market modal share identified in the 2011 Census. This target is sufficient, however it does not specify a timeframe of when this target will be achieved, or any remedial measures. It could be achieved in a five-year period based on the information in the monitoring section of the Travel Plan. For the Travel Plan to achieve this target there will need to be some amendments to the document.

The Travel Plan will need to take into account of the poor bus service provision for residents wishing to use the bus to commute to work as an alternative to single-occupancy vehicle travel. To help encourage residents to use sustainable transport, there should be a multi-modal voucher provided in the Welcome Travel Pack to the value of two one-month rail season tickets to Ipswich; or bus or cycle voucher of equivalent value. Any infrastructure improvements agreed should be incorporated into the Travel Plan.

In regard to the Travel Plan marketing there should be a further marketing measure to include on-site Travel Plan event days. Other residential Travel Plans locally and regionally have used days that include sustainable transport exhibitors to discuss the benefits of sustainable transport with the residents. This marketing measure should be required through the Travel Plan.

Table 2.1 does not make any reference to the catchment secondary school, which will be Stowmarket High School. Stowmarket High School is over five miles away from the proposed development, so there will need to be some measures in the Travel Plan to encourage pupils that attend this school by sustainable transport.

The Baseline Travel Information will need expanding further, as there is no Origin-Destination 2011 Census data that shows the existing commuter flows from Needham Market. Including this data can help understand where the residents of the proposed development are likely to commute to and by what mode of transport. Including this data can help tailor some more appropriate interim Travel Plan measures. There is also a minor link between the Travel Plan and supporting Transport Assessment

(dated May 2016) in regard to the overarching principles of Travel Plans and Transport Assessments identified in the 2014 Planning Practice Guidance, referenced in paragraphs 4.14 and 4.15 of the Transport Assessment. However, there is no reference in the Travel Plan linking back in to the Transport Assessment. There will need to be some reference in the Travel Plan on how the modal shift target of reducing single-occupancy vehicle travel links back in with the Transport Assessment, especially with the trip generation. Accurate trip generation figures must be included in the Travel Plan, as monitoring the highway impact (through traffic counts) should also be taken into account to comply with the overarching principles in the 2014 Planning Practice Guidance. The sites used to produce the trip rates in the TA possibly underestimate the actual vehicular trip generation. This is not likely to be enough to make the conclusions on delay at junctions unacceptable but they could make achieving the travel plan target more difficult.

The monitoring of the Travel Plan should primarily be focused on the reduction of the trips identified in the Transport Assessment, as traffic counts can accurately measure the highway impact of the development and the success of the Travel Plan in reducing the impact. There will need to be a reference in the Travel Plan to undertake the traffic counts for a minimum two-week period during a neutral month. Resident Travel surveys should provide some useful qualitative data to supplement the traffic counts, but should not be solely relied upon due to the experience of low response rates from other residential Travel Plans in Suffolk. Also the monitoring trigger point and duration should be amended to take place on occupation of the 100th dwelling for a minimum of five years or one year after occupation of the final (152nd) dwelling, whichever is longest.

The applicant must submit a revised travel plan that takes into account the comments raised above prior to the determination of this application for the County Council not to object on this basis too.

The requirement for a Travel Plan complies with National Planning Policy Framework paragraph 32 and other relevant paragraphs include 34, 35, 36 and 37.

In addition, a good travel plan will also support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

To fully secure the implementation of this travel plan the following Section 106 contributions would be required:

- Travel Plan Evaluation and Support Contribution - £1,000 per annum for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assist the ongoing implementation of the travel plan, which may result in the failure of the travel plan to mitigate the highway impact of this development.
- Travel Plan Implementation Bond, or cash deposit - £102,339 (£673 per dwelling – based on the estimated cost of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

Section 106 obligations must secure the implementation of the travel plan not condition(s). Planning condition(s) will be insufficient due to the size and possible phasing of the development. Section 106 obligations must secure the following elements of the Travel Plan:

- Approval and full implementation of the Interim Residential Travel Plan
- Provision of an approved welcome pack to each resident on first occupation
- Approval and full implementation of the Full Residential Travel Plan
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

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

- necessary to make the development acceptable in planning terms;
- directly related to the development; and

- fairly and reasonably related in scale and kind to the development

More detailed comment on the Travel Plan and Full wording for the proposed Section 106 obligations can be provided by SCC's Travel Plan Officer on request or if planning permission is granted.

Finally, SCC's Flood & Water Engineer has advised that there is a history of flooding to the public highways adjacent to the proposed site. In addition, if the access road is to be culverted Land Drainage Act consent will also be required, although that doesn't appear to relate to the immediate access from Barking Road.

Yours sincerely,

Christopher Fish
Senior Highway Development Control Engineer
Strategic Development – Resource Management

From: Christopher Fish
Sent: 22 November 2016 14:47
To: Planning Admin; Lisa Evans
Cc: S106 Planning Contributions Admin Mailbox
Subject: Public Rights of Way improvements MS/3506/16 - Needham Market, Land North of Barking Road IP6 8JF

Lisa,

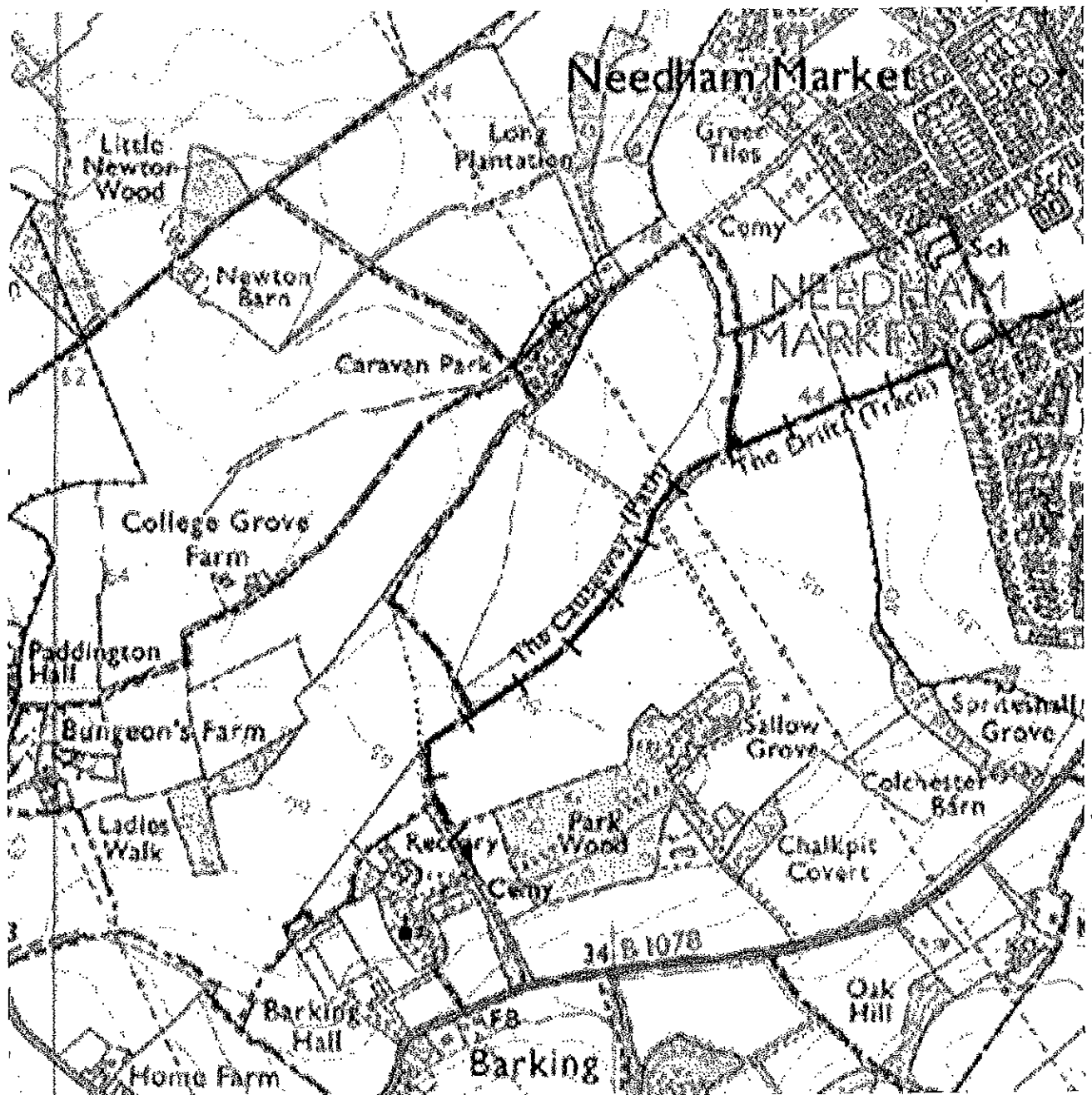
I managed to overlook public rights of way in my response yesterday and I have been duly reminded. Please find below an appropriate S106 funding recommendation, if permission is granted. A partial contribution would be considered.

Christopher Fish MEng IEng
Senior Development Management Engineer, Transport Strategy, Strategic Development - Resource Management, Suffolk County Council, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX Telephone: 01473 265924 Email: christopher.fish@suffolk.gov.uk Web site: <http://atrium.suffolkcc.gov.uk/ePlanningOHS/index.jsp>

Public Rights of Way Response

The proposed development will have a direct impact on the local public rights of way (PROW) network, please refer to the map.

PROW are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism.



The anticipated increased use of the PROW network of as a result of the development will require the following offsite improvement works, refer to attached plan:

- Point 1 – Barking FP47 – Install new set of steps and handrail
- Point 2 – Needham Market BR15 – lay a new sealed surface on short section of the path: 20m length x 3m width
- Point 3 – Needham Market BR15 – lay a new, unsealed, all weather surface: 42m length x 3m width
- Point 4 – Footpath creation. There is an absence of paths linking the causeway and the drift to the Barking road: possible land owner compensation

Point 5 – Install new bridleway bridge

Point 6 - Footpath creation. There is an absence of paths linking the causeway and the drift to the Barking road. Possible land owner compensation

Point 7 - Needham Market FP1 – lay a new, unsealed, all weather surface: 210m length x 1.5m width inc. 2 days heavy clearance

Point 8 – Footpath creation behind the football club and installation of a footbridge. There is an absence of paths linking the causeway and the drift to the Barking road. Possible land owner compensation.

Point 9 – Needham Market FP1 – lay a new, unsealed, all weather surface: 160m length x 1.5m width

Total s106 funding requested from this development = **£46,563.00**

National Planning Policy Framework

The following sections of the NPPF bear relevance to Public Rights of Way:

Section 3 - Supporting a prosperous rural economy

Para 28 - To promote a strong rural economy, local and neighbourhood plans should...support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside.

Section 4 - Promoting sustainable transport

Para 35 – refers to priority given to pedestrian and cycle movements, creating safe and secure routes to minimise conflicts between traffic and cyclists or pedestrians and to consider the needs of people with disabilities by all modes of transport.

Section 8 - Promoting healthy communities

Para 69 - Planning policies and decisions, in turn, should aim to achieve places which promote...safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

Para 73 - Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.

Para 75 - Planning policies should protect and enhance public rights of way and local authorities should seek opportunities to provide better facilities for users, for example by adding links to the rights of way network.

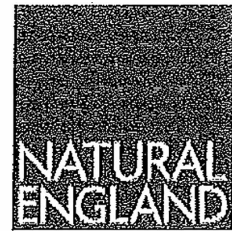
Suffolk County Council Strategies and Policies:

- The Rights of Way Improvement Plan which, inter alia, highlights the importance of development in rural areas should give people the greatest opportunity to access the countryside by walking and cycling,

- The Walking Strategy, which seeks to ensure existing communities with a population over 500, and new developments over 10 dwellings have easy access to a one mile natural walk or 2ha of green space, within 500m of their home,
- The Cycling Strategy, which seeks to promote a transfer to cycling (and walking) for short distance trips, plan and design for the future with cycling in mind and create a safe and cycle friendly environment,
- The Joint Health and Wellbeing Strategy for Suffolk, outcome 2 of which states Suffolk residents should have access to a healthy environment and take responsibility for the own health and wellbeing,
- The Nature Strategy which seeks to ensure physical access improvements go hand-in-hand with wildlife sensitivity and quality interpretation, to enable people to access and understand our natural environment.

- The Walking Strategy, which seeks to ensure existing communities with a population over 500, and new developments over 10 dwellings have easy access to a one mile natural walk or 2ha of green space, within 500m of their home,
- The Cycling Strategy, which seeks to promote a transfer to cycling (and walking) for short distance trips, plan and design for the future with cycling in mind and create a safe and cycle friendly environment,
- The Joint Health and Wellbeing Strategy for Suffolk, outcome 2 of which states Suffolk residents should have access to a healthy environment and take responsibility for the own health and wellbeing,
- The Nature Strategy which seeks to ensure physical access improvements go hand-in-hand with wildlife sensitivity and quality interpretation, to enable people to access and understand our natural environment.

Date: 14 September 2016
Our ref: 194511
Your ref: 3506/16



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

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

T 0300 060 3900

BY EMAIL ONLY

Dear Lisa Evans

Planning consultation: Application for 152 residential dwellings with associated infrastructure
Location: Needham Market Country Practice, Barking Road, Needham Market, IP6 8HG

Thank you for your consultation on the above dated 14 September 2016 which was received by Natural England on 14 September 2016.

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

Natural England has assessed this application using the Impact Risk Zones data (IRZs) and 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 Barking Wood SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application. Should the details of this application change, Natural England draws your attention to Section 28(I) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.

As suggested in the Phase 2 Ecological Surveys & Assessment submitted in support of the application (Southern Ecological Solutions, dated 2nd August 2016), we advise that operational lighting should be designed through a lighting strategy to limit light spill to sensitive ecological receptors.

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.

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.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

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

For any queries 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
Richard Sykes
Consultations Team

Midlands and East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Tel: 0113 824 9111
Email: kerryharding@nhs.net

Our Ref: NHSE/MIDS/16/3506/KH

Your Ref: 3506/16

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

14 September 2016

Dear Sir / Madam

**Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice.
Barking Road, Needham Market, IP6 8HG.**

1.0 Introduction

- 1.1 Thank you for consulting NHS England on the above planning application.
- 1.2 I refer to the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands and East (East) (NHS England), incorporating Ipswich and East Suffolk Clinical Commissioning Group (CCG).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development is likely to have an impact on the services of 1 GP practice operating within the vicinity of the application site. The GP practice does not have capacity for the additional growth resulting from this development.
- 2.2 The proposed development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated.

3.0 Review of Planning Application

- 3.1 The planning application does not appear to include a Health Impact Assessment (HIA). The Planning Statement does however acknowledge that the proposed development will be liable for Community Infrastructure Levy (CIL) charges.
- 3.2 The Planning Statement includes the facilitation of additional car parking and improved access to Needham Market Country Practice, details quoted as follows:

'Part of the development, includes proposals to improve the vehicular access to the existing Needham Market Country Practice, and to facilitate the increase in car parking available at the Practice. This will be achieved by proposing an area to the front of the application site for the construction of up to a 50 space car park for the sole use and purpose of the existing Practice. The existing Practice site is already constrained, preventing such expansion from happening. The proposals, if permitted, will help facilitate this expansion.'

It is not clear from the above whether the developer is proposing to deliver the new car park fully complete and operational or merely supply land, further details would need to be provided.

The proposed additional car parking is subject to NHS England approval processes and CCG agreement. Details have not yet been submitted to NHS England by Needham Market Country Practice for the proposed additional car parking.

4.0 Assessment of Development Impact on Existing Healthcare Provision

4.1 The existing GP practice does not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately 365 residents and subsequently increase demand upon existing constrained services.

4.2 The primary healthcare services within a 2km radius of the proposed development and the current capacity position is shown in Table 1.

Table 1: Summary of position for primary healthcare services within a 2km radius (or closest to) the proposed development

Premises	Weighted List Size ¹	NIA (m²)²	Capacity³	Spare Capacity (NIA m²)⁴
Needham Market Country Practice	12,436	432.10	6,301	-420.65
Total	12,436	432.10	6,301	-420.65

Notes:

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
2. Current Net Internal Area occupied by the Practice
3. Patient Capacity based on the Existing NIA of the Practice
4. Based on existing weighted list size

4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

5.0 Healthcare Needs Arising From the Proposed Development

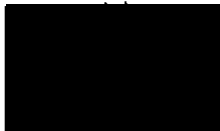
5.1 The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

5.2 The development would give rise to a need for improvements to capacity. This could be by way of developer provision of land for additional car parking or an appropriate capital cost contribution towards extension, refurbishment or reconfiguration at Needham Market Country Practice. Subject to negotiation between the developer and the GP practice and the approval of NHS England.

6.0 Conclusions

- 6.1 In its capacity as the primary healthcare commissioner, NHS England has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.
- 6.2 Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 6.3 NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully



Kerry Harding
Estates Advisor

Your ref: 3010 / 16
Our ref: 00047581
Date: 14 September 2016
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Lisa Evans
Development Management Planning Officer
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear Lisa,

Re: Needham Market, Land North of Barking Road IP6 8JF - Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes).

I refer to the above application for planning permission in Mid Suffolk.

Proposed number of dwellings from development:	2 bedroom+ Houses	Total
	152	152
Approximate persons generated from proposal	350	350

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this application and this will need to be considered by the Council.

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District Councils have a shared approach to calculating infrastructure needs, in the adopted Section 106 Developers Guide to Infrastructure Contributions in Suffolk.

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

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- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and Infrastructure.
- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule On 21st January 2016 and started charging CIL on planning permissions granted from 11th April 2016. Mid Suffolk are required by Regulation 123 to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Provision of passenger transport
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

As of 6th April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. **The requirements being sought would be requested through CIL**, unless they are site specific mitigation, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

Site specific mitigation will still be covered by a planning obligation and/or planning conditions.

The details of specific CIL contribution requirements related to the proposed scheme are set out below:

- 1. Education.** NPPF paragraph 72 states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide

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opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

School level	Minimum pupil yield:	Required:	Cost per place £ (2016/17):
Primary school age range, 5-11*:	38	38	12,181
High school age range, 11-16:	27	0	18,355
Sixth school age range, 16+:	6	0	19,907

Total education contributions:	£462,878.00
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The local catchment schools are Bosmere Community Primary School and Stowmarket High School.

We currently forecast to have no surplus places at the catchment Primary School, but there are sufficient places available at the High School to accommodate children and 16+ students arising from the proposal. We will therefore be seeking education contributions against this particular scheme as set out above towards providing additional education facilities. SCC will be seeking CIL funding for the above pupils forecast to arise from the development.

The scale of contributions is based on cost multipliers for the capital cost of providing a school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2016/17 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

Through the Childcare Act 2016, the Government will be rolling out an additional 15 hours free childcare to eligible households from September 2017.

Childcare provision in Needham Market is currently supplied through four early years providers (including one child minder). An additional 26 place setting has recently been opened in Needham Market (Jigsaw Pre School) to meet existing demand, and there are a total of 58 available places for 2 – 5 year olds in the area. Therefore no early years contributions are sought as there are sufficient spaces available.

	Minimum number of eligible children:	Required:	Cost per place £ (2016/17):
Pre-School age range, 2-4:	15	0	6,091

Required pre-school contributions:	£ 0.00
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3. **Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
 - a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
 - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
 - d. Routes to children's play spaces are safe and accessible for all children and young people.

4. **Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be co-ordinated by Christopher Fish of Suffolk County Highway Network Management. Site specific mitigation requirements may include:

Passenger Transport site specific mitigation (planning obligation):

There is no turning loop shown on the masterplan for this site, residents will therefore have to walk to the nearest stop on Barking Road or Foxglove in order

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to catch a bus service to either Ipswich or Stowmarket. Suitable pedestrian links should therefore be created and the existing bus stops should be improved with raised kerbs at £5,000 and two Real Time Passenger Information (RTPI) screens at £20,000.

Public Rights of Way site specific mitigation (planning obligation):

The anticipated increased use of the PROW network as a result of this development will require a planning obligation for approximately £57,500.00 for offsite improvement works. The precise detail of these works and costs will be set out in the Suffolk County Highway Network Management's response.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002). The guidance can be viewed at <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/2015-11-16-FINAL-2015-Updated-Suffolk-Guidance-for-Parking.pdf>

5. **Libraries.** Refer to the NPPF 'Section 8 Promoting healthy communities'. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space.

Using established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent at the local catchment library at Needham Market and allows for improvements and enhancements to be made to library services and facilities.

Libraries contribution:	£32,832.00
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6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste

management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

Waste Contribution:

£ 0.00

7. **Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Mid Suffolk housing team to identify local housing needs.
8. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Additionally, and more widely, when considering major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

On 18 December 2014 the secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

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

The changes set out in the MWS took effect from 06 April 2015.

9. Archaeology. Please refer to the response sent by Rachel Abraham (SCC Senior Archaeological Officer), reference 2016_3506, on 1 September 2016.

10. Fire Service. The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

11. Superfast broadband.

SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion, it also impacts educational attainment and social wellbeing, as well as impacting property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

12. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

13. Time Limits. The above information is time-limited for 6 months only from the date of this letter and/or will need to be reassessed if a planning application is submitted.

14. Summary Table

Service Requirement	Contribution per dwelling	Capital Contribution
Education - Primary	£3,045.25	£462,878.00
Education – Secondary	£ 0.00	£ 0.00
Education – Sixth Form	£0.00	£ 0.00
Pre-School	£0.00	£ 0.00
Transport (See section 4)		
Libraries	£216.00	£32,832.00
Waste	£0.00	£0.00
Total	£3,261.25	£495,710.00

The table above would form the basis of a future bid to the District Council for **CIL funds** if planning permission was granted and implemented. This will be reviewed

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when a reserved matters application is submitted.

Yours sincerely,


Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC
Christopher Fish, SCC
Iain Maxwell, SCC



Consultation Response Pro forma

1	Application Number	3506/16/OUT -- Barking Road, Needham Market	
2	Date of Response	15 th September 2016	
3	Responding Officer	Name:	Louise Barker
		Job Title:	Housing Enabling Officer
		Responding on behalf of...	Strategic Planning
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<div style="border: 1px solid black; padding: 5px;"> <p>This is an outline development proposal for 152 residential dwellings and triggers an affordable housing provision requirement of 35% under altered policy H4 of the Mid Suffolk Local Plan (on development proposals of 5 units and over outside of Stowmarket and Needham Market) equating to 53 affordable housing units.</p> </div> <p>1. Housing Need Information:</p> <p>1.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2012, confirms a continuing need for housing across all tenures and a growing need for affordable housing.</p> <p>1.2 The 2012 SHMA indicates that in Mid Suffolk there is a need for 229 new affordable homes per annum. The Survey also confirmed that an appropriate affordable housing tenure split for the District is 75% rented and 25% low cost home ownership tenure accommodation.</p>	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

		<p>1.3 Furthermore the 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 a key driver for this increased demand for smaller homes.</p> <p>1.4 With an aging population, both nationally and locally new homes should, wherever possible, be built to Lifetime-Homes standards and this can include houses, apartments and bungalows.</p> <p>1.5 The Suffolk Housing Needs Survey also confirms that there is strong demand for one and two bedroom flats/apartments and houses. Developers should consider flats/apartments that are well specified with good size rooms to encourage downsizing amongst older people, provided these are in the right location for easy access to facilities. There is also a demand for smaller terraced and semi-detached houses suitable for all age groups and with two or three bedrooms.</p> <p>1.6 Broadband and satellite facilities as part of the design for all tenures should be standard to support.</p> <p>1.7 All new properties need to have high levels of energy efficiency.</p> <p>1.8 Studio and bedsit style accommodation is not in high demand.</p>
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	<p>2. Choice Based Lettings Information:</p> <p>2.1 The Council's Choice Based Lettings system currently has circa 1039 applicants registered for housing in Mid Suffolk; at August 16, 99 applicants are registered as seeking accommodation in Needham Market. This site is a S106 planning obligation site therefore affordable housing will be to meet district wide need hence the 1039 applicants registered is the figure to note.</p> <p>3. Recommended Affordable Housing Mix:</p> <p>3.1 It is noted that the design and access statement with this application proposes 35% affordable housing which is welcomed. 35% affordable housing on this proposal based on 152 units equates to 53 AH units.</p> <p>3.2 The following mix is recommended:</p> <p>Affordable Rent Tenancy:</p> <ul style="list-style-type: none"> • 8 x 1b 2p flats @ 50sqm • 6 x 1b 2p houses @ 58sqm • 6 x 2b 4p flats @ 70sqm • 5 x 2b 3p bungalows @ 61sqm • 2 x 2b 4p bungalows @ 70sqm • 9 x 2b 4p houses @ 79sqm • 2 x 3b 5p houses @ 93sqm <p>Shared Ownership:</p> <ul style="list-style-type: none"> • 2 x 1b 2p houses @ 58sqm • 8 x 2bed 4p houses @ 79sqm • 3 x 2b 3p bungalows @ 61sqm • 2 x 3bed 5 person houses @ 93sqm <p>(Recommended nationally described space standards.)</p>
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	<p>4. Other requirements for affordable homes:</p> <ul style="list-style-type: none"> • Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards • The council is granted 100% nomination rights to all the affordable units in perpetuity • The Shared Ownership properties must have an 80% stair casing bar. • The Council will not support a bid for Homes & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free • The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice • On larger sites the affordable housing should not be placed in groups of more than 15 units • Adequate parking provision is made for the affordable housing units • It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and Affordable Housing for full details. • AH dwellings must be tenure blind. <p>5. Open Market Homes Mix:</p> <p>There is a strong need for homes more suited to the over 55 age bracket within the district and certainly within Needham Market and supply of single storey</p>
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		<p>dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities. Hence we would be looking for less 4 bed houses and a greater amount of 2 beds than are proposed and inclusion of a number of bungalows/chalet bungalows to accommodate over 55's. A small number of 2 bed flats would also be recommended.</p>
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	<p>Recommended conditions</p>	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.



SUFFOLK CONSTABULARY

Secured by Design



Phil Kemp
Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
Raynegate Street, Bury St Edmunds
Suffolk
Tel: 01284 774141
www.suffolk.police.uk

Planning Application (3506/16)

SITE: 152 New Homes for the area of Barking Road, Needham Market, Suffolk,

Applicant: Hopkins Homes Ltd

Planning Officer: Ms Lisa Evans

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines.

Dear Ms Evans

Thank you for allowing me to provide an input for the above Outline Planning Application for 152 residential properties at Barking Road and by Spriteshall Grove, Needham Market.

One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:

A safe community: Protect the environment from pollution, flooding and other natural and man-made disasters; reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment.

Section 17 outlines the responsibilities placed on local authorities to prevent crime and dis-order.

The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.

1.0 I strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development.

1.1 As of the 1st June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards
http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf

NOT PROTECTIVELY MARKED
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- 1.2 SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide, namely Gold, Silver or Bronze standards. It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>
- 1.3 **To achieve a Silver standard, or part 2 Secured by Design physical security**, which is the police approved minimum security standard and also achieves ADQ, involves the following:
- a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
 - b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
 - c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, or STS204 issue 3:2012, or LPS1175 issue 7:2010 Security Rating 1, or LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

It is now widely accepted a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of that development.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which, when combined, enhances natural surveillance and safety.

The applicant can also enter into a **pre-build agreement** and make use of the Award in any marketing or promotion of the development. The current "New Homes 2016" guide and application forms are available from www.securedbydesign.com which explains all the crime reduction elements of the scheme.

- 1.4 The current proposal comprises an indicative layout at this outline stage and does not include the full details needed for me to fully comment. However, based on the plans seen, evidence obtained from previous criminal and anti-social activity in the locale, my submissions are as follows:

2. General layout of the proposed plan

- 2.1 From the plans I have seen it would appear that a number of the dwellings will be positioned facing each other, which is a preferred police view of sighting properties as it allows for natural surveillance of the area and one another's homes. It is important that the boundary between public and private areas is clearly indicated. Each building needs two faces: a front onto public space for the most public activities and a back where the most private activities take place. If this principle is applied consistently, streets will be overlooked by building fronts improving community interaction and offering surveillance that creates a safer feeling

for residents and passers-by. For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.

- 2.2 From the plans seen I have not been able to fully determine the designs of the properties, the police preference is that gable end walls do not have windowless elevations adjacent to public spaces, as they do not allow any natural surveillance and tend to attract graffiti, or inappropriate loitering. Where blank gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content.
- 2.3 Similarly and again as raised in the Design Access Statement that the new development should not impede or have any undue effect on the already established housing on Foxglove Avenue. I have particular concerns at the top of Foxglove Avenue marked viewpoint 4 on the location plans as this is a very open area and provides easy access for any offender.
- 2.4 I can find no specific details for the securing of the development perimeter apart from the Planning Statement mentioning that perimeter buffers will have hedgerows I would recommend that all perimeters, especially at the top of Foxglove Avenue are enclosed by natural defensive vegetation, such as Hawthorn, Berberis or Pyracantha to a height of no more than 1 metre as laid out in Para 17 of SBD New Homes 2016, referring to "Planting in new developments".
- 2.5 Similarly I can find no details for the securing of the rear perimeters of all properties. It would be preferred if these perimeter areas are secured with 1.8 metre close boarded fencing. Or to allow further sunlight that the close boarded fencing is 1.5m high and complimented with 0.3m trellis on top to add heightened security.

3.0 Footpaths

- 3.1 The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community. There is no blanket approach, site specifics apply, based on the crime rate and local context.
- 3.2 The plans list possible further footpaths, in view of the opinions stated at above (para 4.1) I would recommend that in the interests of securing the area, further footpaths are not installed.

4. Lighting

- 4.1 I cannot comment on the lighting as there are no details submitted on the plans. However, I would recommend photocell operated wall mounted lighting at the front of all household dwellings, (on a dusk to dawn light timer) complete with a compact fluorescent lamp and wired through a switched spur to allow for manual override. I would also appreciate viewing a "Lux" lighting plan of the proposed site.
- 4.2 Lighting should conform to the requirements of BS 5489:2013. A luminaire that produces a

white light source (Ra>59 on the colour rendering index) should be specified but luminaires that exceed 80 on the colour-rendering index are preferred.

5. Car Parking

- 5.1 Communal parking facilities must be lit to the relevant levels as recommended by BS5489:2013 and a certificate of compliance provided. See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.

6. Communal Areas/ Public Open Space

- 6.1 **Communal Areas/Public Open Space:** Recommendation is for knee-rail top fencing area. Section 9 SBD 2016 provides further details around Communal areas in order to reduce the potential for ASB and Criminal Damage issues.
- 6.2 Should any play equipment be installed it should meet **BS EN 1176** standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to **BS EN1177** standards.
- 6.3 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 6.4 **Gates:** As a general principle these should take 4-8 seconds to close from a 90 degree opening position. To prevent animal access they should be outward opening.
- 6.5 **Fences:** Should pass the entrapment requirements, i.e. less than 89mm between vertical palings, no horizontal access and hoop tops should pass the head and neck probe.
- 6.6 **Seats:** These should be placed at least 300mm from the fence to prevent potential entrapment between the bench and the fence.
- 6.7 **Pathways:** Erosion resisting pathways should be provided into the site at least to the seating areas.
- 6.8 "The Association of Play Industries Technical Guidance relating to playground layout and design", provides a 10 principle approach to designing a successful play area.
- 6.9 All litter bins should be of a fire retardant material.
- 6.10 The Fields Trust Planning and Design for Outdoor Sport and Play introduced 2008 and The Association of Play Industries Adult Outdoor fitness Equipment Standards also offer further guidance.

7. Further Recommendations in General

- 7.1 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 7.2 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17)
- 7.3 Key Lockable rear gates, the gates 1.8m high and installed at the side of the property. The

gates must not be easy to climb or remove from their hinges.

- 7.4 Trees should allow, when mature, crown lift with clear stem to a two metre height. Similarly, shrubbery should be selected so that, when mature, the height does not exceed 1 metre, thereby ensuring a one metre window of surveillance upon approach whether on foot or using a vehicle.

8. Conclusion

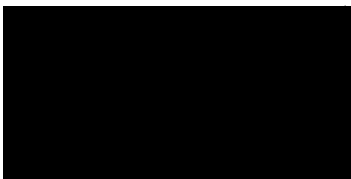
In conclusion the proposed plan is proportionate to other properties within the local area.

Should a play area be considered, usage by non-age appropriate people, (i.e. older children) for which the play area would not be designed is a possibility. Teenage youths will always gather somewhere, often it is in a play park as it is considered an out of the way area away from parents. The best way to address such problems is to find alternative areas for such groups. One tried and tested method is providing a youth shelter.

I would be pleased to work with the agent and/or the developer to ensure the proposed development incorporates the required elements. This is the most efficient way to proceed with residential developments and is a partnership approach to reduce the opportunity for crime and the fear of crime.

If you wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely



Phil Kemp

Designing Out Crime Officer
Western and Southern Areas
Suffolk Constabulary
Raynegate Street
Bury St Edmunds
Suffolk
IP33 2AP

From: Clerk (Needham Market Town Council) [mailto:clerk@needhammarkettc.co.uk]
Sent: 06 October 2016 12:11
To: Planning Admin
Cc: richardcampbell1@hotmail.co.uk; Martin Spurling; xyinhope@icloud.com
Subject: Consultation Submission - Planning Application 3506/16
Importance: High

Dear Sir/Madam,

The following is Needham Market Town Council's response to consultation on Planning Application Ref: 3506/16:

Needham Market Town Councillors are totally frustrated by the lack of response to the Town Council's request for a dialogue and agreement with Mid Suffolk District Council on the position whereby Mid Suffolk District Council has no up-to-date Local Plan and no 5-year Housing Land Supply Policy. In these circumstances the Town Council is unable to complete its Neighbourhood Plan which remains at draft stage. The Town Council is conscious there is no existing strategic framework in which this Planning Application can be considered, to the significant detriment of the community of Needham Market. It is imperative the development proposed by this Planning Application is not allowed to proceed in isolation of the longer term strategic aspirations of the community of Needham Market. Those aspirations are not to oppose growth, but to ensure it is delivered in the context of how our community wishes the town to develop.

The initial comment of the Town Council is as follows:

- The sewerage and surface water systems need to be able to cope with the increased flow from the development and may require a balancing pond to assist.
- A roundabout at the Barking Road entrance to the development would reduce the likelihood of accidents and also make it easier for residents to leave and enter the estate.
- A pedestrian access should be included from the development onto Foxglove Avenue
- There is considerable concern about whether the infrastructure of the town is able to cope with the increase in residents, particularly the doctors surgery and school provisions.
- The access roads to the development should be wide enough to allow a bus service
- Parking control/restrictions should be included as part of the development.

In view of there being no reply to my email sent to your Council on 22nd September requesting an extension of the consultation period, to today, I would be grateful if you would acknowledge this submission and confirm it will be included in the responses to the application.

Kind regards,

Kevin Hunter

Town Clerk
Needham Market Town Council
Tel. (01449) 722246

Barking Parish Council response to Planning Application 3506/16

Barking Parish Council OBJECTS to this application on the following grounds:

1. Departure from the Local Plan

Barking Parish Council regards this proposed development as a blatant departure from the Local Plan. Barking is categorised as 'Countryside' in the Local Plan. There are no schools, shops, only three buses a day (to Ipswich) – the one and only bus stop is approx. 2 miles from the proposed site, one public house/Chinese restaurant, and one garage (repairs and MOTs only). The infrastructure and services within Barking are not capable of supporting such a large development within the parish (part of this site is within the parish of Barking). Although the proposed development is on the boundary with Needham Market, it is still within the Barking parish boundary and would greatly alter the character of this very rural and mainly agricultural community, with its beautiful common (the Tye), a distinctive feature of the parish.

It is feared this development will inevitably lead to yet another boundary review and a further loss of parish land to Needham Market. Already in recent years both the Chalk Pit quarry site, and the Lion Barn Industrial Estate have been moved incorporated into the Needham Market boundary, including some residential properties due to their location. In recent years, the Needham Market Country Practice has indicated the desire to extend its boundary and car park onto part of the land in question, but within the boundary of Needham Market (which was supported by Barking Parish Council), but to build 152 houses, a large number of which will be over the parish boundary into Barking was never envisaged by this parish council. It is suggested that this land has been on the radar of MSDC for many years, but Local Plan firmly regards Barking as Countryside, with no plans for any development.

2. Visual Impact

Barking's boundary will be compromised - there will no longer be a buffer between Barking and Needham Market. This incursion into the buffer zone is totally unacceptable. The visual impact of this proposed development cannot be understated. Upon passing the current doctor's surgery – the Needham Market Country Practice, there is beautiful open countryside, with a handful of houses on either side of the road which are largely set back off the road and are therefore unseen/shielded from view. This proposed development will be a huge negative visual impact, and the associated considerable night light pollution, totally out of character with the rural setting. The site rises significantly several metres above the level of the road and surrounding fields, and the light pollution at night will have a huge negative impact on the local area and on local wildlife.

Paragraph 49 of the Local Development Framework refers to the lack of a 5 year land supply, and it is that failure of MSDC to have a long term strategic plan that is giving the green light to developers

to ride rough shod over small countryside communities, with no respect at all for all the hard work they have done to try to create vibrant communities.

There is land available within the boundary of Needham Market for such developments which are more appropriate without encroaching within the boundary of small parishes such as Barking - most of the parish is designated as a Special Landscape Area.

3. Barking Village Design Statement - 2002/Barking Parish Plan 2011

The Parish Council has to ask what is the point of small communities such as Barking, spending time and money undertaking Parish Plans and Village Design Statements (and encouraged to do so by Suffolk County Council and MSDC) when this hard work is largely ignored.

a) Barking Village Design Statement - 2002 (copy attached).

This document was adopted by Mid Suffolk District Council as Supplementary Planning Guidance and will be a material consideration when dealing with planning applications.

Extracts of Barking's Village Design Statement - particular reference to the following statements are here brought to the attention of MSDC Planning.

1. 'Every proposal that requires planning permission must be considered in the light of the Special Landscape Character designation that applies to most of the Parish'. 'The aim must be to ensure that the essential rolling character of the landscape is retained and not harmed by any development and, if possible is enhanced for future generations.'

2. 'New developments must be designed to respect inward and outward views of the village and must give high priority to landscape design'.

14. 'Any development should not make uncharacteristic incursions into existing agricultural land. An urban style estate would be totally damaging to the rural character of the village.'

b) Barking Parish Plan 2011 (attached)

This document was adopted by Mid Suffolk District Council in 2011 as a supplementary document to the Local Development Framework. It represented the views of the residents at that time on a range of issues including housing. 92% wanted the character of the village to be maintained. Although 28 people felt they would need a family home and 17 would need a bungalow, in the next 10 years, this needs to be viewed in conjunction with the Village Design Statement referred to above.

4. Highways/Traffic

The results of a traffic survey carried out in February 2016, reported 2625 daily vehicle movements northbound and 2573 southbound. It is accepted that 61 – 65% (2011 census) of people's preferred mode of transport was the private motor car, so it is predicted that the junction with the B1078 will see an expected increase in vehicle movements, a high percentage of which will be during rush hour

of approx. 200 a day from this proposed development on its own, let alone an increase in patients visiting the surgery from new developments at Great Blakenham, the Chalk Pit development, Hill House Lane development. It is vital that this application is not looked at in isolation, and that the impact on the surgery and on the surrounding road network of other new and proposed developments be taken into account. Barking Parish Council wishes to see a projected increase in volume of traffic to the doctors surgery as the result of all the new housing planned to be built between now and 2025 in the local area, not just this development alone. The Needham Market Country Practice has a very large catchment area and MSDC Planning is urged to consider the impact on the junction with Barking Road/B1078 where access to the Practice (and pharmacy) and to the development itself is proposed to be.

The Barking Road/B1078 is already a very busy, fast and dangerous road (60mph at the proposed junction). Any extension to the 30mph speed limit along the Barking Road/B1078 is welcomed (and indeed has been campaigned for by Barking Parish Council) but this must be enforceable. **There have been two fatal accidents very close to the proposed junction already – one on 16th July 2005 and the second this year on 15th March 2016. Both incidents have been totally overlooked by the developers.** The only reference to highway safety appears to be a suggestion that the 30mph limit is extended along the Barking Road/B1078 as far as SCC Highways deem appropriate. Both accidents occurred in dry conditions. Barking Parish Council and SCC Highways have been trying for several years to raise driver's awareness of the 30mph speed limit within Barking, but without enforcement there have been numerous incidents and accidents, especially adjacent to Barking Hall Nursing Home. Without enforcement, the evidence suggests that cars will still approach this proposed junction at high speed (heading towards Needham Market from Barking), so the extension of the 30mph limit on its own would not be acceptable.

5. Biodiversity

The site is home to numerous species of wildlife on which the negative impact of this proposed development will be felt. The Landscape and Visual Impact Assessment – S.10, states that there is likely to be rabbit and deer activity on or around the site. Hares are known to frequent this field. The loss of farmland species was highlighted recently by BBC 'Countryfile'. Once again, such large housing developments on greenbelt and in particular prime agricultural land is totally unacceptable. Wildlife is increasingly dependent upon a decreasing habitat. Emphasis should be placed on protecting existing habitats, not concreting over them over so they are lost forever.

6. Government Guidelines

Our new Prime Minister is herself quoted as saying *"There is a clear need to address population growth and provide more houses, but at the same time we must protect what is best about the local area including its Green Belt land, open countryside, nature and wildlife, and historic sites and buildings."* (2014 - she submitted representations as a local MP to the Windsor and Maidenhead Local Plan,) and *"people want homes in a decent environment with a good quality of life, not with*

green belt and green fields concreted over” (Speaking in the House of Commons when she was a new MP in 1997).

7. Impact on the Community

The residents of this proposed new development, despite any efforts by the community of Barking, will inevitably feel they live in Needham Market, will have a Needham Market address and will feel no affiliation to the other residents of Barking. Despite the linear nature of Barking there is a strong sense of community and a positive wish to preserve the features within the parish, but also to embrace beneficial change. This proposed development cannot be deemed beneficial for the parish of Barking. There may be a desire and need to provide more housing across the district, but these developments must take place in more appropriate locations. The preservation of the parish and its countryside setting should not be sacrificed.

Barking Parish Council is appalled by the total disregard by Hopkins Homes of Barking Parish - possibly only mentioned twice in the whole application, ... and then only in respect of CIL and consultation (a separate consultation was held with the people of Barking only after an intervention by the Parish Council).

8. Flooding

There is a proven flooding issue at Foxglove Avenue – with, it is understood, several residents being unable to secure insurance for flood events, and the Barking Road/ B1078 just beyond ‘Oak Hill’ has regularly flooded in the past, and this was just from surface water running off the fields. There appears to be a token ‘dry’ pond adjunct to the proposed new surgery car park. This is an inadequate response to potential serious flooding at this location. 152 additional new homes will inevitably lead for further serious flooding issues at this location. The applicant has not demonstrated an adequate resolution to likely serious flooding at this site.

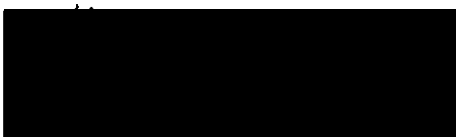
9. Provision of Services

The Needham Market Country Practice has stated that it will be able to cope, but where is the evidence that the Practice can cope with the extra demand that will be placed on both the surgery itself and the pharmacy by the addition of approx. 365 new patients resulting from this proposed new development alone. Local residents will testify now that the Practice cannot currently meet the demands of the local community – the scope of reach reaches as far as Henley. The addition of more car parking spaces has been needed for many years, but it is the capability of the Practice itself to meet the needs of 152 new homes that is being challenged, and is considered to be unsustainable.

10. Need

Need for housing in Barking – we have recently seen the completion of 3 new affordable homes within the settlement boundary of Barking, close to the village centre. There is no strong case made for a large housing development within Barking. ... and the local infrastructure cannot support one anyway. There is one small but well used Village Hall, and a Chinese restaurant/Public House. The Barking Pre-School is full already with a waiting list. If there is a need for some new homes, then any housing must be within the settlement area, not on the remote outskirts where residents will inevitably regard themselves as living in Needham Market and will access services and amenities in Needham Market, not Barking. There will be a complete disconnect with Barking residents. Small villages have been encouraged by both Suffolk County Council and Mid Suffolk District Council to engage with their communities and to produce Parish Plans and Village Design Statements, both of which have been completed by Barking residents. Are these documents now being ignored? How is the village to represent, engage with, and provide local services to residents of a disconnected housing development?

Barking Parish Council urges Mid Suffolk District Council NOT to grant outline planning permission for this site to build 152 new homes. There is every likelihood that permission will inevitably lead to further development on the adjacent sites (a fact that has been acknowledged by Hopkins Homes themselves quite openly and it is understood that nearby land owners are already being approached to sell their land for development). It is very important that this application is not dealt with in isolation and that there is a long term strategy by Mid Suffolk District Council in place. Without it, it is inevitable that more applications will follow for land adjacent to this site.



Rosemary Cochrane

Clerk to the Council

Barking Parish Council

21st September 2016

3506/16

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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

MID SUFFOLK DISTRICT COUNCIL
PLANNING CONTROL
RECEIVED
26 SEP 2016
ACKNOWLEDGED
DATE
PASS TO <i>LE</i>

Your Ref: 3506/16+S106
Our Ref: FS/F216196
Enquires to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: http://www.suffolk.gov.uk

Date: 23/09/2016

Dear Sirs

Barking road, Needham Market IP6 8EZ
Planning Application No: 3506/16+S106

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

PLEASE PLACE THE FOLLOWING COMMENTS AND CONDITION REQUEST ON THE WEBSITE.

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible at this time to determine the number of fire hydrants required for fire

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fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

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



Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr J Alfatt, Bidwells LLP, 16 Upper King Street, Norwich NR3 1HA

Planningcontributions.admin@suffolk.gov.uk

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

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

Your Ref: 3506/16+S106
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: 23 September 2016

Planning Ref: 3506/16+S106

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Barking Road, Needham Market IP6 8EZ
DESCRIPTION: 152 dwellings
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.

Continued/

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

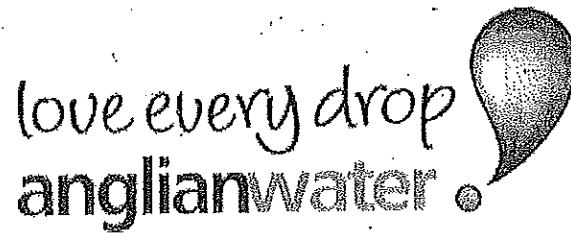
Yours faithfully



Mrs A Kempen
Water Officer

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Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00017041
Local Planning Authority: Mid Suffolk District
Site: Barking Road, Needham Market
Proposal: Creation of 152 x C3 Dwellings
Planning Application: 3506/16

Prepared by: Mark Rhodes

Date: 05 October 2016

If you would like to discuss any of the points in this document please
contact me on 0345 0265 458 or email
planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

- 1.1 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

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

Section 3 – Foul Sewerage Network

- 3.1 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

Section 4 – Surface Water Disposal

- 4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

Section 5 – Trade Effluent

- 5.1 Not applicable

Phil Watson Senior Landscape Officer
Natural Environment Team

Endeavour House (B2 F5 47)
Russell Road
IPSWICH

IP1 2BX
Suffolk
Tel: 01473 264777
Fax: 01473 216889
Email: phil.watson@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Your Ref: 3506/16
Our Ref:
Date: 17/11/2016

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Ms Lisa Evans
Planning Dept
Mid Suffolk District Council
131 High St
Needham Market
Suffolk
IP6 8DL

Dear Lisa,

Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice

Based on the information provided by the applicant and a site visit carried out, on the 19th September, with the SCC Senior Ecologist Mrs Sue Hooton, I offer the following comments.

The site and landscape

The site is on rising ground, largely arable, on the edge of Needham market and abuts a Special Landscape Area (Saved Policy CL2). The site also includes a woodland on the western side although this is outside the built footprint of the scheme.

The information provided by the applicant

The applicant has provided an LVIA as part of the application and based on the proposal, which suggests some dwellings may be as high as 3 storeys, (*Development Framework Plan*) and consequently high or High to moderate visual impacts out to about 800m and a more extensive area of moderate visual impacts across both the built up area and the open countryside of the SLA.

Likely Landscape and Visual effects

The site will clearly undergo significant change with a loss of characteristic arable land cover. As the applicant has identified there will be locally widespread visual effects of a high magnitude. Furthermore the outlook for adjoining dwellings and local roads, as well as rights of way to the south east of the site will undergo significant change.

Given the extent of visual impacts and the sensitivity of the receiving landscape, in particular the countryside to the west and south of the site, it is essential that appropriate and robust mitigation is secured. The final project design should reasonably minimise landscape and visual impacts.

I therefore suggest that a detailed Landscaping Masterplan is required in order to demonstrate how these issues will be dealt with should be secured by condition. The agreed landscape masterplan would then form the basis of the detailed conditions in respect of hard and soft landscaping, as well as ecological mitigation open space and SuDs layout.

Furthermore I suggest that in this instance it would be reasonable to control the height of any dwellings to a maximum of 2.5 storeys.

Other matters

Appropriate measures and funding for the long term management of the public spaces and existing woodland on the site should be secured by the LPA.

Recommendations

The proposal is acceptable in landscape terms with the following conditions;

CONCURRENT WITH SUBMISSION OF FIRST RESERVED MATTERS: HARD AND SOFT LANDSCAPING MASTERPLAN

Before any development is commenced, and concurrent with the submission of the Reserved Matters application(s), A Landscaping Masterplan shall be submitted to and agreed by the local planning authority. The Landscape Masterplan shall to include;

- a) The layout and arrangement of soft landscaping, proposed range species of trees shrubs and other planting and seeding, to also include proposed planting and seeding of SuDs attenuation features and the location of any ecological mitigation and enhancement features.
- b) The layout and arrangement of hard landscaping, including outline information of the materials palette and design principles to be adopted and the lighting arrangements for the site as a whole.
- c) The agreed Landscape Masterplan shall form the basis of the detailed hard and soft landscaping scheme/s

CONCURRENT WITH SUBMISSION OF FIRST RESERVED MATTERS: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP), FOR PUBLIC OPEN SPACES AND BUFFER PLANTING, AND SPRITESHALL GROVE.

The content of the LEMP shall cover a 20 year period and include the following;

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- a) A description and evaluation of the areas to be managed
- b) The aims and objectives of management and appropriate management options for these to be achieved
- c) Prescriptions for management action, a work schedule and annual work plan
- d) Details of the body or organisation responsible for implementation of the plan
- e) The LEMP will also provide details of the legal and funding mechanisms by which the plan will be secured.

The approved plan will be implemented in accordance with the approved details

CONCURRENT WITH RESERVED MATTERS: DESIGN CODE

Concurrent with the submission of the Reserved Matters application (s), a Design Code shall be submitted to the Local Planning Authority. The Design Code shall pertain to and include the following: architectural design and materials, the function and treatment of open spaces, street types and materials, parking, boundary treatments (including the details of screen walls and fences for individual dwellings), movement patterns (including connectivity to the offsite public rights of way network), lighting, security principles and domestic waste bin storage arrangements. Thereafter the development shall be carried out in accordance with the approved details.

CONCURRENT WITH RESERVED MATTERS: SOFT LANDSCAPING

No development shall commence within a development area or phase, until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for that development area/phase, drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be undertaken during the course of the development. This scheme shall also include the planting required to provide the necessary ecological mitigation and enhancement identified in the application. Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

CONCURRENT WITH RESERVED MATTERS: HARD LANDSCAPING

No development shall commence within a development area or phase, until full details of a hard landscaping scheme for that area/phase has been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (for example furniture, play areas and equipment, refuse and/or other storage units, signs, lighting and similar features); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features).

CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall

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show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;

- a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.
- b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

PRIOR TO COMMENCEMENT: TREE PROTECTION

Any trees, shrubs and hedgerows within, or at the boundary of, the development area or phase, shall be protected in accordance with a scheme of tree protection, (BS5837:2012), to be agreed in writing with the Local Planning Authority prior to commencement. The Local Planning Authority shall be advised in writing that the protective measures/fencing within a development area/phase have been provided before any equipment, machinery or materials are brought onto the site for the purposes of development and shall continue to be so protected during the period of construction and until all equipment, machinery and surplus materials have been removed.

Within the fenced area no work shall take place; no materials shall be stored; no oil or other chemicals shall be stored or disposed of; no concrete, mortar or plaster shall be mixed; no fires shall be started; no service trenches shall be dug; no soil shall be removed or ground level changed at any time, without the prior written consent of the Local Planning Authority.

MAXIMUM HEIGHT OF DWELLINGS

The arrangement and distribution of house types and sizes shall be in accordance with the perimeter plan and no part of the scheme shall be greater than 2.5 Storeys or XXM above final ground levels

Reasons

I have made these recommendations in order to reasonably minimise the adverse impacts of the development on the character of the landscape and local visual amenity having particular regard for Policy CS5 and saved policy CL2.

Yours sincerely

Phil Watson
Senior Landscape Officer



Lisa Evans
Planning Department
Mid Suffolk District Council
131 High Street
Needham Market, IP6 8DL

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Brooke House
Ashbocking
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28/09/2016

Dear Lisa,

RE: 3506/16. Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice, Barking Road, Needham Market

Thank you for sending us details of this application, we have read the ecological survey reports (Southern Ecological Solutions, Apr and Aug 2016) and have the following comments:

Protected Species

We note that surveys for hazel dormice are yet to be completed, it is therefore not currently possible to determine the likely impact of the proposed development on this species. Hazel dormouse is a protected species (under the Conservation of Habitats and Species Regulations (2010) (as amended) and the Wildlife and Countryside Act (1981) (as amended)) and are therefore a material consideration when determining a planning application (ODPM Circular 06/2005). The required survey and assessment work must therefore be undertaken prior to the determination of this application.

We also note that the proposed dormouse surveys are intended to be carried out in to September, we recommend that this period is extended until at least the end of October. Hazel dormice are a difficult species to survey for and our experience in Suffolk over the last 16 years indicates that extending surveys towards the end of the survey season (November) results in a greater chance of detecting the presence of this species.

Designated Sites

As recognised in the ecological survey reports, the proposed development site is within approximately 500m of components of the Barking Woods Site of Special Scientific Interest (SSSI). It is noted that the ecological assessment concludes that there will be no significant adverse impact on this SSSI, subject to the provision of adequate public open space within the proposed development. Whilst the illustrative Masterplan drawing submitted with the application appears to include such public open space, it is unclear whether the area proposed meets that identified as required in the ecological report. This should be clarified prior to the determination of this application.

It is also noted that this is an outline application, it must therefore be ensured that the required public open space is included as part of the final design of any development in this location.

We also recommend that Natural England's SSSI Impact Risk Zones for the relevant SSSIs are considered as

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part of the determination of this application.

Ecological Enhancements

Any development at this site should include significant ecological enhancements, appropriate to the area. This should include ensuring that all greenspaces are managed to maximise their biodiversity value in the long term.

Conclusion

We consider that, for the reasons set out above, there is currently insufficient information available to allow this application to be determined. These matters must be addressed prior to the determination of this application, if they cannot permission should not be granted.

Notwithstanding the above, should it be determined that development is acceptable in this location; we request that the mitigation and enhancement recommendations made within the report are implemented in full, via a condition of planning consent.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

James Meyer
Conservation Planner



Sian Bunbury
Planning Department
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08/12/2016

Dear Sian,

RE: 3506/16 Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings – Further Comments. Barking Road, Needham Market

Thank you for sending us further details of this application. We note that, following our letter of 28th September 2016, further ecological survey information (Phase 2 Survey Report, Southern Ecological Solutions (Nov 2016)) has been provided in support of this application. We have the following comments on the information provided:

Protected Species

We note that hazel dormouse surveys at this site have now been completed and that this species was not recorded on site. It therefore appears that, as currently presented, the proposed development is unlikely to result in an adverse impact on this species. However, as this species is known to be present within the area surrounding the site, we recommend that any site management seeks to maximise the value of the habitats on site (existing and new) for hazel dormice.

Designated Sites

As set out in our letter of 28th September 2016, the ecological survey reports (Southern Ecological Solutions, Apr 2016; Aug 2016 and Nov 2016) recognise that the proposed development site is within approximately 500m of components of the Barking Woods Site of Special Scientific Interest (SSSI). It is noted that the ecological assessment concludes that there will be no significant adverse impact on this SSSI, subject to the provision of adequate public open space within the proposed development. Whilst the illustrative Masterplan drawing submitted with the application appears to include such public open space, it is unclear whether the area proposed meets that identified as required in the ecological report. This should be clarified prior to the determination of this application.

It is also noted that this is an outline application, it must therefore be ensured that the required public open space is included as part of the final design of any development in this location.

Ecological Mitigation

Should it be determined that development is acceptable in this location, we request that the mitigation and enhancement recommendations made within all of the ecological survey reports are implemented in full, via a condition of planning consent.

We also note that this is an Outline planning application, it should be borne in mind that any Reserved Matters applications must be based on up to date ecological survey information and therefore they may be

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a need to carry out further survey work dependent on the amount of time which elapses before any RMA is submitted.

Ecological Enhancements

Any development at this site should include significant ecological enhancements, appropriate to the area. This should include ensuring that all greenspaces are managed to maximise their biodiversity value in the long term.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

James Meyer
Senior Conservation Planner



12 December 2016

Sian Bunbury
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

By email only

Hi Sian

Application: 3506/16

Location: Barking Road, Needham Market

Proposal: Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice.

Thank you for consulting Place Services on the above application.

I have a holding objection as there is insufficient ecological information available to understand the impacts of development on farmland birds particularly Skylark, a Priority species.

1. The site and ecology

The site is mainly arable land although it contains Priority habitat – woodland and hedgerow. It is also likely to support Priority species – bats, amphibians, reptiles, hare, skylark and potentially hedgehog - with dormouse and badger also in the wider landscape locally – as well as an assemblage of breeding birds, including farmland specialists.

2. The information provided by the applicant

2.1 I have reviewed the ecological material submitted – the extended Phase 1 habitat survey, SES (April 2016) and the final Phase 2 Ecological Surveys & Assessment report, SES (Nov 2016). I am satisfied that these reports are supported by adequate and appropriate desk studies and, **except for farmland birds**, based on field surveys with data being adequate and up to date. The constraint on pond surveys due to lack of access permission is noted although **precautionary methods have not been provided to deal with habitat connectivity for amphibians with the construction site.**



As farmland birds surveys were considered unnecessary (Phase 1 Habitat Survey, April 2016), there is a gap in information which needs to be filled before determination of this application.

2.2 The report provides a summary of species and habitats likely to be affected *except for Skylark, a Priority species* and therefore describes most of the likely impacts. Unfortunately the Phase 1 Habitat Survey report did not flag up the possibility of breeding or foraging farmland birds on the site.

2.3 Survey and assessment of biodiversity features has been carried out by suitably qualified ecologists at the appropriate time of year, using appropriate methodologies and the report written in accordance with CIEEM report writing guidelines.

3. Likely impacts of development:

3.1 Adverse impacts from the proposed development upon designated sites (nearby Barking Woods SSSI), Priority habitats, as well as Protected and Priority species, have been assessed and these will be mitigated in line with relevant wildlife legislation and planning policy. The reports explain how proposed mitigation will address likely effects and how such measures will be secured through planning conditions.

However an *assessment* of likely impacts on nesting or foraging skylark, a Priority species, is also necessary to inform any additional mitigation measures needing to be secured. Given the size and nature of the site, it is likely that there will be an additional requirement for offsite skylark mitigation eg nest plots on arable land nearby similar to agri-environment option AB4 skylark plots, which will need to be secured by legal agreement.

3.2 Timing of operations eg clearance of hedgerows or trees, will be required to avoid anyone connected with project from committing an offence of disturbing nesting birds. Section 6.3 (Recommendations) of the submitted Phase 1 Habitat Survey report, SES (Nov 2016), will need to be secured by planning condition.

3.3 Amphibians and reptiles

Subject to a condition to implement the mitigation measures contained in the submitted Ecological Appraisal *and requiring additional precautionary methods to deal with potential impacts during construction due to habitat connectivity with the site*, I am satisfied that there will be no significant adverse impacts from the development on Gt crested newt, a European Protected Species, and other amphibians and reptiles.

3.4 Bats

Through the retention of boundary trees and biodiversity improvements, the development of the application site is considered unlikely to result in significant habitat loss effects on foraging /commuting bats, provided a sensitive lighting scheme is implemented. The lighting design will therefore need to minimise impacts on bats to avoid deliberate disturbance to these European Protected Species. A detailed & sensitive Lighting scheme will need to ensure that the vegetated features on the site are *not illuminated to a level greater than 1 lux* (equivalent to strong moonlight) rather than 2 lux referred to in the Phase 1 Habitat Survey report. This is required in order to adequately minimise the impact of the development on bats.



I am satisfied that there will be no significant adverse impacts on these European Protected Species, subject to appropriate conditions to protect the retained woodland and hedgerows (and to control exterior lighting), which are important bat foraging and commuting routes.

3.5 Breeding birds

Subject to appropriate conditions being attached to any consent to secure the mitigation measures as recommended in the submitted ecological reports, I am satisfied that there will be no significant adverse impacts on birds nesting in trees/shrubs/hedgerows.

3.6 Priority habitat - broadleaved woodland & hedgerow

The mitigation necessary to avoid recreational impacts on nearby Barking Woods SSSI will require the submitted Reserved Matters documents to ensure sufficient greenspace is provided within the final design.

The inclusion of the broadleaved woodland within the red line boundary as part of the recreational greenspace of the development will trigger the need to secure appropriate ongoing management to ensure ecological functionality for this Priority habitat.

I am satisfied that the retention and enhancement of existing hedgerows with the development is acceptable and precautionary methods to deal with removal where unavoidable to deliver net gain for biodiversity from this development.

3.7 Priority species – hedgehog & skylark

In addition to mitigation during construction, confirmation from the applicant that all the fencing within the development is hedgehog-friendly as mitigation for loss of connectivity for this Priority species is required.

Subject to appropriate conditions for clearance and hedgehog friendly fencing throughout the development, I am satisfied therefore that there will be no significant adverse impacts on hedgehog, a Priority Species, which is likely to be present on site.

However there is likely to be an additional requirement for *offsite* mitigation eg skylark nest plots on arable land nearby similar to agri-environment option AB4 skylark plots, which if required, will need to be secured by legal agreement.

Until the above information is provided, I am not satisfied that the adverse impacts on skylark, a Priority Species, which is likely to be present on site, has been adequately assessed and mitigation considered.

4 Biodiversity enhancements

Biodiversity enhancements should be incorporated into the design of the development in accordance and I am satisfied that the enhancement recommendations set out in the submitted Phase 2 Ecological Surveys & Assessment report, SES (Nov 2016), are appropriate and reasonable.

However I would welcome a discussion about an additional enhancement opportunity, to fit integrated bird boxes for swift, a Priority species, into the building design.



5 Recommendations

Should this development be subsequently found to be acceptable, the mitigation measures identified in the Phase 1 Habitat Survey and Phase 2 Ecological Surveys & Assessment reports, SES (April and Nov 2016), should be secured for implementation in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, dormouse, badger, amphibians & reptiles, hedgehogs and breeding birds.

I would also expect the preparation of a long term Landscape & Ecological Management Plan (LEMP), prior to 1st occupation to conserve and enhance Protected and Priority habitats. Submission for approval and implementation of these plans in full should be a condition of any planning consent.

I. PRIOR TO COMMENCEMENT: COMPLIANCE WITH ECOLOGICAL REPORTS RECOMMENDATIONS

"All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Phase 1 Habitat Survey report , SES (April 2016) and Phase 2 Ecological Surveys & Assessment report, SES (Nov 2016), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECOW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

II. (if triggered) PRIOR TO COMMENCEMENT: SKYARK MITIGATION STRATEGY "A skylark mitigation strategy shall be submitted for approval and implemented in full to mitigate the loss of nesting habitat."

III. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENTS

"All ecological measures and/or works shall be carried out in accordance with the details contained in the Phase 1 Habitat Survey report , SES (April 2016) and Phase 2 Ecological Surveys & Assessment report, SES (Nov 2016), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination"

IV. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

a. *"Prior to occupation, a Landscape and Ecological Management Plan (LEMP) for the landscape buffer and habitats on-site shall be submitted to and be approved in writing by the local planning authority. The content of the LEMP, shall include the following:*

- a) Description and evaluation of the features to be managed and enhanced*
- b) Aims and objectives of management*
- c) Appropriate management options for achieving aims and objectives*
- d) Prescriptions for management actions*
- e) Preparation of a work schedule (including annual work plan capable of being rolled forward over a five year period)*



- f) *Details of the body or organisation responsible for implementation of the plan*
- g) *Ongoing monitoring and remedial measures*
- b. *The LEMP shall also include details of the legal and funding mechanisms by which the long term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

V. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME

"Prior to occupation, a lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

6. Reasons

6.1 The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Habitats Regulations.

6.2 The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended.

6.3 The applicant has NOT provided sufficient information to allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)

7 Conclusion

I agree that the works will result in impacts on important ecological features including Priority hedgerow habitat and could impact on Protected and Priority species. Subject to agreeing the mitigation necessary for farmland birds, this development can be made acceptable with mitigation secured to minimise the impacts will be minimised. The above information requirements and conditions are based on BS42020:2013 and in terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of the Local Planning Authority.

Please contact me with any queries.



Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant
Place Services at Essex County Council
sue.hooton@essex.gov.uk

Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



20 February 2017

Sian Bunbury
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

By email only

Hi Sian

Application: 3506/16

Location: Barking Road, Needham Market

Proposal: Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice.

I withdraw the holding objection on this application and I can now confirm that the information is adequate for determination.

Further to my letter of 12 December, I have now received the additional ecological information requested for this application (Ecological Review in Relation to Protected Species).

The *assessment* of likely impacts on nesting or foraging skylark, a Priority species, has been provided and mitigation measures for skylarks will not be necessary, nor a condition for a skylark mitigation strategy.

The additional detail for Gt Crested newts is also appreciated and this addresses concerns that precautionary methods are needed to deal with habitat connectivity for amphibians with the construction site. The mitigation measures contained in the submitted Ecological Appraisal should be appended and these should all be included in a method statement, secured by a pre-commencement condition of any consent. Adding this detail is helpful in avoiding impacts on amphibians during the construction phase.

Recommendations

Should this development be subsequently found to be acceptable, the mitigation measures identified in the Phase 1 Habitat Survey and Phase 2 Ecological Surveys & Assessment reports, SES



(April and Nov 2016), should be secured for implementation in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, dormouse, badger, amphibians & reptiles, hedgehogs and breeding birds.

I would also expect the preparation of a long term Landscape & Ecological Management Plan (LEMP), prior to 1st occupation to conserve and enhance Protected and Priority habitats. Submission for approval and implementation of these plans in full should be a condition of any planning consent.

Suggested conditions on any consent are:

I. PRIOR TO COMMENCEMENT: BIODIVERSITY MITIGATION AND ENHANCEMENT STRATEGY

"A biodiversity mitigation and enhancement strategy shall be submitted and approved in writing by the local planning authority and implemented in full. This should include a method statement to deliver all the ecological mitigation measures and/or works detailed in the Phase 1 Habitat Survey report, SES (April 2016) and Phase 2 Ecological Surveys & Assessment report, SES (Nov 2016) plus suitable enhancement measures including swift nest boxes.

This is likely to include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and under s40 of the NERC Act 2006 (Priority habitats & species)

II. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

a. *"Prior to occupation, a Landscape and Ecological Management Plan (LEMP) for the landscape buffer and habitats on-site shall be submitted to and be approved in writing by the local planning authority. The content of the LEMP, shall include the following:*

- a) Description and evaluation of the features to be managed and enhanced*
- b) Aims and objectives of management*
- c) Appropriate management options for achieving aims and objectives*
- d) Prescriptions for management actions*
- e) Preparation of a work schedule (including annual work plan capable of being rolled forward over a five year period)*
- f) Details of the body or organisation responsible for implementation of the plan*
- g) Ongoing monitoring and remedial measures*

b. *The LEMP shall also include details of the legal and funding mechanisms by which the long term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the*



originally approved scheme. The approved plan will be implemented in accordance with the approved details."

Reason: To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and under s40 of the NERC Act 2006 (Priority habitats & species)

III. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME

"Prior to occupation, a lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations and the Wildlife & Countryside Act 1981 as amended

6 Conclusion

I agree that the works will result in impacts on important ecological features including Priority hedgerow habitat and could impact on Protected and Priority species. Subject to agreeing the mitigation necessary for farmland birds, this development can be made acceptable with mitigation secured to minimise the impacts will be minimised. The above information requirements and conditions are based on BS42020:2013 and in terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of the Local Planning Authority.

Please contact me with any queries.

Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant
Place Services at Essex County Council
sue.hooton@essex.gov.uk
07809 314447

Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils



Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

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

Our ref: AE/2016/120807/01-L01
Your ref: 3506/16
Date: 08 September 2016

Dear Ms Evans

OUTLINE PLANNING PERMISSION WITH VEHICULAR ACCESS (ALL OTHER MATTERS RESERVED) FOR THE CONSTRUCTION OF 152 RESIDENTIAL DWELLINGS (INCLUDING MARKET AND AFFORDABLE HOMES) GARAGES, PARKING, VEHICULAR ACCESS WITH BARKING ROAD, ESTATE ROADS, PUBLIC OPEN SPACE, PLAY AREAS, LANDSCAPING AND AMENITY GREEN SPACE WITH SUSTAINABLE DRAINAGE SYSTEMS, WITH ASSOCIATED INFRASTRUCTURE, INCLUDING PROVISION FOR ADDITIONAL CAR PARKING AND IMPROVED VEHICULAR ACCESS TO NEEDHAM MARKET COUNTRY PRACTICE BARKING ROAD, NEEDHAM MARKET IP6 8HG.

Thank you for your letter in respect of the above planning application which we received on 25 August 2016.

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason

The submitted flood risk assessment (FRA), undertaken by JMS Civil and Structural Consulting Engineers referenced IP15_095_09 and dated January 2016, does not comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change, Reference ID: 7-030-20140306. The submitted FRA does not, therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

- Correctly identify the impacts of fluvial flood risk from the Lion Barn Drain.
- Assess the impact of climate change using appropriate climate change allowances. In this instance, according to 'Flood risk assessments: climate change allowances', the allowances that should be assessed are the Higher Central (35% increase in peak flow) & Upper End (65% increase in

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peak flow).

Overcoming our Objection

The applicant can overcome our holding objection by submitting an FRA that covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. We provide further technical advice in the Technical Appendix below.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

Flood Risk Mapping

Our maps show the site is located in fluvial Flood Zone 1, 2 & 3 associated with the ordinary watercourse Lion Barn Drain.

We have undertaken some detailed flood modelling (Needham Market Flood Risk Study 2015) as referred to in the FRA but this only extends to the south eastern corner of the site. The Flood Zones on the site are therefore not derived from detailed modelling. This source of flood risk to the site has therefore not been assessed in detail.

Technical Appendix

Further advice and guidance on flood risk is provided below to assist the applicant in addressing our concerns.

Modelling Guidance

The FRA has referred to the Needham Market Flood Risk Study (2015) modelled flood levels as provided by us. However, the model does not cover the site. The FRA uses the node referenced 'LB1378us' at the upstream limit of the model in the south eastern corner of the site and has applied it across the site. Based on this, the FRA states that the site falls wholly within Flood Zone 1. The node and flood level referred to is located at the downstream end of the section of watercourse within the site boundary. Water levels are likely to be lower here as water levels generally decrease downstream. This may not, therefore, be representative of the flood risk posed to the watercourse on the site in a flood event.

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The Flood Zone maps on the site are formed of national generalised modelling, which was used in 2004 to create fluvial floodplain maps on a national scale. This modelling is known as JFLOW and does not undertake a site specific detailed assessment. It is used to give an indication of areas at risk from flooding.

JFLOW outputs are not suitable for detailed decision making. Normally, in these circumstances, an FRA will need to undertake a modelling exercise in order to derive flood levels and extents, both with and without allowances for climate change, in order to inform the design for the site. Without this information, the risk to the development from fluvial flooding associated with the Lion Barn Drain ordinary watercourse is unknown.

It is extremely important that this is investigated further as some of the properties are proposed to be located very close to the Lion Barn Drain as detailed in the 'Proposed Master Plan Layout' in Appendix B of the FRA. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk.

Climate Change

Climate change allowances have changed recently. Our new guidance 'Flood risk assessments: climate change allowances', published on 19 February 2016, provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. This advice updates the previous climate change allowances to support the NPPF.

For fluvial scenarios climate change was previously considered using a 20% increase in peak flow as standard. This was a nationwide allowance which has now been replaced with a river basin district approach based on specific catchment characteristics. As a result, a range of allowances has now been produced known as the central, higher central and upper end. For the Anglian river basin district the percentage increases in flow are available in 'Table 1: peak river flow allowances by river basin district'.

For more vulnerable developments in flood zone 3, the higher central (35%) and upper end (65%) allowances over a 100 year lifetime should be used. It is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Where assessment shows flood risk increases steadily and to shallow depths, it is likely to be more appropriate to choose a flood lower in the range. Where assessment shows flood risk increases sharply due to a 'cliff edge' effect caused by, for example, sudden changes in topography or defences failing or overtopping, it is likely to be more



appropriate to choose a flood level higher in the range.

The 'higher central' climate change allowance is our minimum benchmark for flood risk mitigation. If possible the development should be designed to be safe through raised floor levels in the 65% climate change allowance. If this is not possible then robust justification should be provided, and the development should be designed to be safe through raised floor levels in the 35% allowance and the safety and sustainability of the development should be assessed for the 65% and managed through flood resilient/resistant construction measures to the satisfaction of the Local Council.

The 2015 modelling referred to in the FRA uses the old 20% peak flow allowance. This allowance is no longer appropriate for this type of development and the above needs to be considered further.

We therefore advise that modelling is undertaken to accurately establish the fluvial flood risk to the proposed development in terms of potential depths and locations of flooding and to consider climate change. As your development is large-major (30 dwellings) we recommend that detailed modelling is undertaken to ensure climate change is considered accurately. You should model both the 35% and 65% allowances.

As we already have a model available downstream of the site this could be extended upstream to include the site. This data can be obtained free of charge by emailing enquiries@environment-agency.gov.uk and requesting a 'Product 7' data set. The watercourse should be modelled for a range of return period events, including the 1 in 20, 1 in 100 and 1 in 1000 year events, both with and without the addition of climate change. The flood levels on the development site should be determined and compared to a topographic site survey to determine the flood depths and extents across the site.

Please refer to the attached documents for further advice regarding modelling submissions:

- OI 379_05 Computational modelling to assess flood and coastal risk
- Flood Estimation Guidelines
- 'Using Computer River Modelling as Part of a Flood Risk Assessment - Best Practice Guidance' for further advice regarding modelling submissions.

We acknowledge that some of the documents above refer to outdated planning policy. However, the technical guidance and our requirements regarding computer modelling remain relevant.

We would recommend that FRAs at all levels should be undertaken under the



creating a better place



supervision of an experienced flood risk management specialist (who would normally be expected to have achieved chartered status with a relevant professional body such as the Institution of Civil Engineers (ICE) or the Chartered Institution of Water and Environmental Management (CIWEM)). Environmental consultants and suppliers can be found from the following directory:
<https://www.endsdirectory.com/>

Surface Water Attenuation Pond

We are no longer the statutory consultee for surface water so have not reviewed this element of the application in detail. Having said this we have noted that the surface water attenuation pond is located very close to the Lion Barn Drain and could be at risk of fluvial flooding especially if the new climate change allowances are considered. This could impact its ability to function in a fluvial flood event. This pond appears to be bunded which could reduce flood plain storage if it is at risk of fluvial flooding. This may need to be investigated further and compensatory storage may need to be considered to ensure there is no net loss in floodplain storage.

Informative - Ordinary Watercourse Consent

It is noted that the main access route to and from the development for all of the properties crosses the watercourse and the area at highest risk of flooding. It should be considered if this is appropriate. An access bridge is proposed. As the Lion Barn Drain is an ordinary watercourse it falls under the jurisdiction of the Lead Local Flood Authority, Suffolk County Council. We recommend you contact Suffolk County Council to discuss this element of the works as you may require consent from them to install this structure.

Informative – Needham Market flood risk management project

You should also be aware that the Needham Market flood risk management project is investigating ways of reducing the risk from fluvial and surface water flooding in the town. This project will not benefit the development site in question, but highlights the importance of ensuring that this development proposal does not increase flood risk to the town and ideally reduces the risk of flooding.

If you have any questions in respect of the above, please do not hesitate to contact me.

Yours sincerely

Louise Tait
Senior Planning Advisor
Direct dial 02084746523
Direct e-mail louise.tait@environment-agency.gov.uk

Tyneside House, Skinnerburn Road, Newcastle Business Park, Newcastle upon Tyne, NE4 7AR.
Customer services line: 03708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk





Environment
Agency

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

Our ref: AE/2016/120807/02-L01
Your ref: 3506/16
Date: 20 February 2017

Dear Ms Bunbury

OUTLINE PLANNING PERMISSION WITH VEHICULAR ACCESS (ALL OTHER MATTERS RESERVED) FOR THE CONSTRUCTION OF 152 RESIDENTIAL DWELLINGS (INCLUDING MARKET AND AFFORDABLE HOMES) GARAGES, PARKING, VEHICULAR ACCESS WITH BARKING ROAD, ESTATE ROADS, PUBLIC OPEN SPACE, PLAY AREAS, LANDSCAPING AND AMENITY GREEN SPACE WITH SUSTAINABLE DRAINAGE SYSTEMS, WITH ASSOCIATED INFRASTRUCTURE, INCLUDING PROVISION FOR ADDITIONAL CAR PARKING AND IMPROVED VEHICULAR ACCESS TO NEEDHAM MARKET COUNTRY PRACTICE BARKING ROAD, NEEDHAM MARKET IP6 8HG

Thank you for your consultation received on 31 January 2017. We have inspected the application, as submitted, and are satisfied that our holding objection on flood risk grounds can be removed, providing that you are satisfied that the development will be safe for its lifetime and you assess the acceptability of the issues within your remit.

Flood Risk

We previously raised an objection to the proposed development as the proposed development was located within the JFLOW Flood Zone. The applicant has revised their proposals to sequentially site the proposed buildings and surface water attenuation areas to fall wholly within Flood Zone 1. Our maps show the site boundary lies partially within fluvial Flood Zone 2 and 3 defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a medium and high probability of flooding respectively. The proposal is for outline planning permission, with vehicular access and all other matters reserved, for the construction of 152 residential dwellings. This type of development is classified as 'more vulnerable' development, as defined in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance.

We are satisfied that the revised Flood Risk Assessment (FRA), undertaken by JMS Civil and Structural Consulting Engineers, referenced IP15_095_09, Revision A and dated January 2016, provides you with the information necessary to make an informed decision. To assist you in making an informed decision about the flood risk affecting this site, the key points to note from the submitted FRA are:

- Section 4.1.7 of the FRA states that the proposed buildings will be located outside of Flood Zone 2 and 3. Appendix B of the FRA shows the amended proposed master plan.
- The main access and egress route travels through Flood Zones 2 and 3 and across the ordinary watercourse to the south of the site. The site does not therefore have a safe route of access and egress in the event of a fluvial flood.
- Flood depths on the site and on the access and egress route remain unknown as the Flood Zones at this location are derived from JFLOW modelling.
- A Flood Evacuation Plan has not yet been proposed.

JFLOW Modelling

The FRA identifies that the Flood Zone maps in this area are formed of national generalised modelling, which was used in 2004 to create fluvial floodplain maps on a national scale. This modelling is known as JFLOW. JFLOW is not a detailed local assessment, it is used to give an indication of areas at risk of flooding. JFLOW outputs are therefore not suitable for detailed decision making. Normally in these circumstances, an FRA would need to undertake a modelling exercise in order to derive flood levels and extents, both with and without allowances for climate change, for the watercourse in order to inform the design for the site.

However, as the applicant has agreed to sequentially site their proposed development to be wholly within Flood Zone 1, we feel it is unnecessary to request the applicant to model the ordinary watercourse to the south of the site. Furthermore our risk of flooding from surface water map which was produced in 2013, more recently than the JFLOW mapping, shows a preferential flow path over the right bank of the ordinary watercourse. All houses and surface water attenuation are therefore sequentially sited outside of the 0.1% (1 in 1000) annual probability rainfall event extent. These maps are based on more up to date LiDAR than the JFLOW mapping.

Guidance for Local Council

Access and Egress

As stated above the main access and egress route for all properties will be located within the Flood Zone and will cross the ordinary watercourse to the south of the site. Consideration should be given to whether it is appropriate to direct the access and egress route towards the area at highest risk of flooding.

As the Flood Zones at the site are based upon JFLOW detailed flood depths and levels are not available. If you feel you do not have sufficient information with regards to flood levels on the site and access/egress routes, we advise that modelling should be undertaken to accurately establish the flood risk in terms of

potential depths and locations of flooding. The watercourse should be modelled in a range of return period events, including the 1 in 20 (5%), 1 in 100 (1%) and 1 in 1000 (0.1%) year events, both with and without the addition of climate change. The flood levels should be determined and compared to a topographic site survey to determine the flood depths and extents.

Safety of Inhabitants – Emergency Flood Plan

Section 4.1.11 of the FRA identifies that the site benefits from the Environment Agency's Flood Warnings Direct Service but does not discuss Flood Warning and Evacuation any further and an Emergency Flood Plan has not been proposed. It should be noted that Flood Warnings are not available for this section of watercourse. Flood Alerts are the only warning available to the site.

You are the competent authority on matters of evacuation or rescue, and therefore should assess the adequacy of the evacuation arrangements, including the safety of the route of access/egress from the site in a flood event. You should consult your emergency planners as you make this assessment.

You should be satisfied with any emergency flood plan submitted and find it adequate for the purposes of the local authority flood plan (for example, possible rescue of inhabitants during a flood, temporary accommodation whilst flood waters subside and properties are uninhabitable).

If you are not satisfied with the emergency flood plan, then we would recommend you refuse the application on the grounds of safety during a flood event, as users would be exposed to flood hazards on access/egress routes.

Other Sources of Flooding

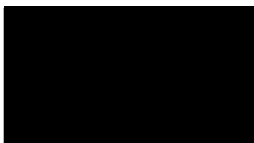
In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

Informative – Ordinary Watercourse Consent

An access bridge across the ordinary watercourse is proposed. As the Lion Barn Drain is not a main river it falls under the jurisdiction of the Lead Local Flood Authority, Suffolk County Council. We recommend you contact Suffolk County Council to discuss this element of the works as you may require consent from them to install this structure.

We trust this advice is useful.

Yours sincerely



Miss Eleanor Stewart
Sustainable Places - Planning Advisor

Direct dial 020 8474 8097

Email planning.ipswich@environment-agency.gov.uk

cc Bidwells

From: RM Floods Planning
Sent: 06 September 2016
To: Planning Admin
Subject: JS Reply Barking Road, Needham Market, IP6 8HG Planning Application 3506/16

Suffolk County Council, Flood & Water Management can make the following initially comments.

The proposals to collect private and highways surface water from the development into a single piped system which conveys the water into an attenuation basin/pond and then discharge into the adjacent watercourse (Lion Barn Watercourse) would be acceptable in principle.

A large section of the downstream watercourse was piped in order to allow the development of the land north east of the site. This piped watercourse is now part of the Anglian Water surface water system (*pipe diameters not known*) and discharges back into the watercourse along the Barking Rd. This watercourse passes under a SCC structure (ref 61/11) which is prone to flooding. There is also a history of flooding to the doctors surgery and the public highways at this location adjacent to the proposed site.

Therefore we would recommend that the discharge rate from the proposed development is at the greenfield runoff rate (Q_{bar}) and that there is freeboard designed into the attenuation basin/pond to allow water from the surgery carpark to flow into the basin/pond during significant rainfall events.

The access to the site will need to be either a single span bridge (*Suffolk County Council, Flood & Water preferred option*) or a culverted. If the latter, then the applicant would need to seek Land Drainage Act consent.

The applicant should be mindful that the consent to culvert a watercourse is separate to a planning permission and maybe refused.

Applicant needs to demonstrate that 2 treatment stages are included in the design to ensure compliance to The Water Environment Regulations for water quality and ecology.

Applicant needs to demonstrate who will be responsible for the open watercourse that runs through the site.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

From: Jason Skilton
Sent: 08 March 2017 09:27
To: James Alflatt
Cc: Simon Bryan; Robert Eburne; Gavin Houghton; Richard Wigzell; Sian Bunbury
Subject: RE: 3506/16 Barking Road - Revised FRA

Hi James,

I can confirm that we haven't formally been re consulted on this application.

As said previously, the general principle of is in line with NPPG, we just had a few of issues that needed to be addressed from the first time around which I have summarised below with what I understand your proposing.

- Maintenance of the watercourse at front of the development – **outstanding, this need to be addressed**
- Discharge rate from the attenuation basin - rate of 12.7l/s proposed
- Access across the watercourse to the development- **outstanding, can be left as either culverted or bridged. SCC preference is the latter and would be subject to a Land Drainage Act consent.**
- Treatment stages – 2 stages proposed i.e. attenuation basin and swale prior to discharge to watercourse.
- Attenuation Basin location – moved outside of current flood zone 2 & 3

Other queries

- Basin side slopes – should be no greater than 1.4, nothing proposed on indicative drainage strategy
- Maintenance of surface water drainage assets - who, what, when, how

I'll now go over the calculation and confirm the acceptance of the proposed discharge rate and come back to you, could you look at the outstanding elements and the other queries please.

Note:- This will need to be formally consulted on by MSDC.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

From: RM Floods Planning
Sent: 04 April 2017 09:23
To: Planning Admin
Cc: Sian Bunbury
Subject: 2017-04-4 JS Reply Barking Road, Needham Market, IP6 8H 3506/16

Suffolk County Council, Flood and Water Management can recommend approval with the following conditions.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
 - g. Details of who will maintain each element of the surface water system for the life.

The scheme shall be fully implemented as approved.

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

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

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

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

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register

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

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

Informatives

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

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864

From: planningadmin@midsuffolk.gov.uk [mailto:planningadmin@midsuffolk.gov.uk]

Sent: 31 March 2017 14:40

To: RM Floods Planning <floods.planning@suffolk.gov.uk>

Subject: Reconsultation on Planning Application,3506/16

Correspondence from MSDC Planning Services.

We recently sent you a consultation in respect of the above application.

We have recently received further information/revised plans in respect of this and would ask you to take this additional information into account when replying.

Please ensure that we receive your reply by **14/04/2017** at the latest.

Your Ref: MS/3506/16
Our Ref: 570\CON\0404\17
Date: 22 February 2017
Highways Enquiries to: christopher.fish@suffolk.gov.uk



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

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

For the Attention of: Sian Bunbury

Dear Sian,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/3506/16**

PROPOSAL: Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice

LOCATION: Site at, Barking Road, Needham Market, Suffolk

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority make the following Comments on the revised details submitted:

The submitted details fail to address the substantive reason for refusal namely inadequate visibility splays for the proposed access. I made a recommendation to investigate the relocation of the access and measurement of traffic speeds to confirm that suitable visibility splays can be achieved. I understand this may be taken on board but has not yet been submitted.

The proposed footway would mitigate pedestrian access, however, it would not provide desirable access for cycling. At the least the cycle track could be extended to the site boundary but to avoid cyclists, notably children cycling on the carriageway it would be much better to widen the cycle track to Foxglove Avenue. Can you confirm that the third party would not be amenable to the provision of a footway/ cycle track on their land please?

Yours sincerely,

Mr Christopher Fish
Senior Highway Development Control Engineer
Strategic Development – Resource Management

Your Ref: MS/3506/16
Our Ref: 570\CON\3506\16
Date: 15th May 2017
Highways Enquiries to: steven.merry@suffolk.gov.uk



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

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

For the Attention of: Ms L. Evans

Dear Lisa,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/3506/16**

PROPOSAL: Outline planning permission with vehicular access (all other matters reserved) for the construction of 152 residential dwellings (including market and affordable homes) garages, parking, vehicular access with Barking Road, estate roads, public open space, play areas, landscaping and amenity green space with sustainable drainage systems, with associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice

LOCATION: Site at, Barking Road, Needham Market, Suffolk

ROAD CLASS: B1078

Following our letter dated 21st November 2016 further information has been made available to us. This is detailed below. The additional information, specifically the clarification of the traffic speeds, speed limit and achievable visibility at the proposed access, resolves the matters that resulted in us recommending refusal of this application.

Notice is hereby given that Suffolk County Council as Highways Authority does not object subject to a S106 planning obligation to its satisfaction and the following conditions being applied to any permission granted to it.

Visibility for proposed access

The terminal signs for the speed limit on Barking Road are incorrectly located. When measured against the description given in the relevant Traffic Regulation Order they should be located approximately 25m to the south of its current location. When measured on site the terminal signs were located 420m south of Grinstead Hill whilst the legal order indicates that these should be at 444m from the same junction.

The applicant has:

- modified the location of the access road slightly to the north of the original proposed location. This will provide visibility of 2.4m x 110m to the south of the access and 2.4m x 90m to the north;
- stated that they are willing to provide traffic management works at the south end of the speed limit on the B1078 Barking Road;
- agreed to enter into an obligation to reduce the speed limit between Needham Market and Barking (subject to the necessary legal processes).

Therefore, the Highways Authority does not have an objection to the application provided that the following conditions are applied:

1. Condition: Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 110 metres (south) and 90 metres (north) along the edge of the metalled carriageway from the centre of the access (Y dimension) or tangential to the nearside edge of the metalled carriageway, whichever is the more onerous. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

2. Condition: No other part of the development shall be commenced until the new vehicular access has been laid out and completed in all respects in accordance with Drawing No. IP15/095/09/SK101 Rev C and with an entrance width of 6.0m meters and been made available for use. Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety

3. Condition: Before the development is commenced details shall be submitted to and approved in writing by the County Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form

Reason: To prevent hazards caused by flowing water or ice on the highway in the interests of highway safety

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

Reason: In the interests of highway safety to ensure that roads/footways are constructed to an acceptable standard.

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

Reason: In the interests of highway safety to ensure that satisfactory access is provided for the safety of residents and the public.

6. Condition: The new estate road junction(s) with the B1078 Barking Road inclusive of cleared land within the sight splays to this junction must be formed prior to any other works commencing or delivery of any other materials.

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

7. Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority.

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

8. Condition: The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

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

9. Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including electric vehicle charging points, powered two vehicle provision, secure covered cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

10. Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

11. Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:
- a) parking and turning for vehicles of site personnel, operatives and visitors
 - b) loading and unloading of plant and materials
 - c) piling techniques
 - d) storage of plant and materials
 - e) programme of works (including measures for traffic management and operating hours)
 - f) provision of boundary hoarding and lighting
 - g) details of proposed means of dust suppression
 - h) details of measures to prevent mud from vehicles leaving the site during construction
 - i) haul routes for construction traffic on the highway network and
 - j) monitoring and review mechanisms.
 - K) Details of deliveries times to the site during construction phase

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase

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

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

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding

arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Speed Limit on Barking Road

12. The County Council as Highways Authority requests a S106 contribution of £10,000 to obtain a legal order to reduce the speed limit between Barking and Needham Market and to implement this Order. A reduction of the speed limit is considered necessary to mitigate the increased risk to road safety due to the additional traffic that will be generated by this development by reducing the number and severity of crashes on the B1078.

Cycleway / Footway on Barking Road

The applicant has agreed to construct a cycleway of 3m width along their frontage from the new access road to the southern limits of the Health Centre. From this point the footway shall be a minimum of 1.8m in width to point at which it connects with the existing footway adjacent to Foxglove Avenue as shown on Drawing No. IP15/095/09/SK101 Rev C.

Bridge: Approval In Principal

The applicant is reminded that an Approval In Principle (AIP) will be required for the culvert across the watercourse if this is put forward for adoption as public highway. It is strongly recommended that the applicant contacts the Highways Authority to discuss this at the earliest opportunity.

Internal Highways Layout

The Suffolk Design Guide (para. 3.3.8) says, '*For major access roads serving more than 150 and up to 300 dwellings... (b) that where only one point of access is available the road layout should form a circuit and there should be the shortest practicable connection between this circuit and the point of access. This should always form the stem of a T-junction usually with a local distributor road.*' The stem can be no less than 60m if the access is from Barking Road. This is reasonable but the illustrative masterplan does not provide any loops, as recommended by the current advice in Manual for Streets. If nothing else, this means refuse collection vehicles will need to reverse more than necessary. Manual for Streets para. 6.7.3 notes that fire services assess the risk of obstruction of a single access and it is recommended that Suffolk Fire and Rescue are consulted on this point. Alternative internal layouts that would guard against such risk and allow for maintenance of the road are possible given the dimensions of the site.

Street Lighting

Street lighting should be provided along Barking Road to the site access if approved for road safety and sustainable access reasons

Travel Plan

For comments on the Travel Plan please refer to our letter of the 21st November 2016

13. To fully secure the implementation of this travel plan the following Section 106 contributions would be required:

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

- Travel Plan Implementation Bond, or cash deposit - £102,339 (£673 per dwelling – based on the estimated cost of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

Section 106 obligations must secure the implementation of the travel plan not condition(s). Planning condition(s) will be insufficient due to the size and possible phasing of the development. Section 106 obligations must secure the following elements of the Travel Plan:

- Approval and full implementation of the Interim Residential Travel Plan
- Provision of an approved welcome pack to each resident on first occupation
- Approval and full implementation of the Full Residential Travel Plan
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

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

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

More detailed comment on the Travel Plan and Full wording for the proposed Section 106 obligations can be provided by SCC's Travel Plan Officer on request or if planning permission is granted.

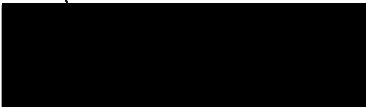
Public Rights of Way (PRoW)

14. The anticipated increase in the use of the PRoW network as a result of the development will require the following off site improvement works;

- Barking FP47; Install new set of steps and handrail (1)
- Needham Market BR15; Lay a new sealed surface 20m long x 3m wide (2)
- Needham Market BR15; Lay a new unsealed all weather surface 42m long x 3m wide (3)
- Create a new two new Footpaths to link the drift to Barking Road (4, 6 and 8)
- Install a new bridge on BR.. (5)
- Needham Market FP1; Lay a new unsealed all weather surface at two locations, 210m long x 1.5m wide and 160m long x 1.5m wide. (7 and 9).

These works will require a S106 contribution of £46,563.00 which should be index linked and any unspent balance repayable after 5 years from the date of payment.

Yours sincerely,



Steve Merry
Transport Policy and Development Manager
Strategic Development – Resource Management

From: David Harrold [<mailto:David.Harrold@baberghmidsuffolk.gov.uk>]
Sent: 11 October 2016 11:15
To: James.Alflatt@bidwells.co.uk
Cc: Lisa.Evans@baberghmidsuffolk.gov.uk
Subject: RE: Ref 3506/16 Barking Road, Needham Market

Dear Mr Alflatt,

Apologies for a delayed response, as you may be aware, I have been on annual leave and have just caught up.

Thank you for sending me the noise assessment and report by dB Consultation Ltd, dated 5 May 2016

The report recommends minimum glazing for twelve dwellings as indicated in Table 6 and an acoustic barrier at the boundary of SCC as indicated in Figure 8.

Providing these mitigation measures are implemented prior to the occupation of any dwelling I do not have any objection to the proposed development.

I will copy in our planning officer so that my previous comments can be amended.

I trust this is of assistance.

David Harrold