

Public Document Pack



COMMITTEE:	DEVELOPMENT CONTROL COMMITTEE A
DATE:	WEDNESDAY, 17 FEBRUARY 2021 9.30 AM
VENUE:	VIRTUAL TEAMS VIDEO MEETING

Councillors	
<u>Conservative and Independent Group</u> Matthew Hicks (Chair) Richard Meyer Dave Muller (Vice-Chair) Timothy Passmore	<u>Green and Liberal Democrat Group</u> Rachel Eburne John Field Sarah Mansel John Matthissen

This meeting will be broadcast live to Youtube and will be capable of repeated viewing. The entirety of the meeting will be filmed except for confidential or exempt items. If you attend the meeting in person and make a representation you will be deemed to have consented to being filmed and that the images and sound recordings could be used for webcasting/ training purposes.

The Council, members of the public and the press may record/film/photograph or broadcast this meeting when the public and the press are not lawfully excluded.

AGENDA

PART 1

MATTERS TO BE CONSIDERED WITH THE PRESS AND PUBLIC PRESENT

Page(s)

- 1 **APOLOGIES FOR ABSENCE/SUBSTITUTIONS**
- 2 **TO RECEIVE ANY DECLARATIONS OF PECUNIARY OR NON-PECUNIARY INTEREST BY MEMBERS**
- 3 **DECLARATIONS OF LOBBYING**
- 4 **DECLARATIONS OF PERSONAL SITE VISITS**
- 5 **NA/20/9 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 20 JANUARY 2021** 7 - 20
- 6 **TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

Please note that the next meeting is scheduled for Wednesday, 17 March 2021 at 9.30 am.

Webcasting/ Live Streaming

The Webcast of the meeting will be available to view on the Councils Youtube page:
https://www.youtube.com/channel/UCSWf_0D13zmegAf5Qv_aZSg

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

Introduction to Public Meetings

Babergh/Mid Suffolk District Councils are committed to Open Government. The proceedings of this meeting are open to the public, apart from any confidential or exempt items which may have to be considered in the absence of the press and public.

Domestic Arrangements:

- Toilets are situated opposite the meeting room.
- Cold water is also available outside opposite the room.
- Please switch off all mobile phones or turn them to silent.

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If you hear the alarm:

1. Leave the building immediately via a Fire Exit and make your way to the Assembly Point (Ipswich Town Football Ground).
2. Follow the signs directing you to the Fire Exits at each end of the floor.
3. Do not enter the Atrium (Ground Floor area and walkways). If you are in the Atrium at the time of the Alarm, follow the signs to the nearest Fire Exit.
4. Use the stairs, not the lifts.
5. Do not re-enter the building until told it is safe to do so.

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

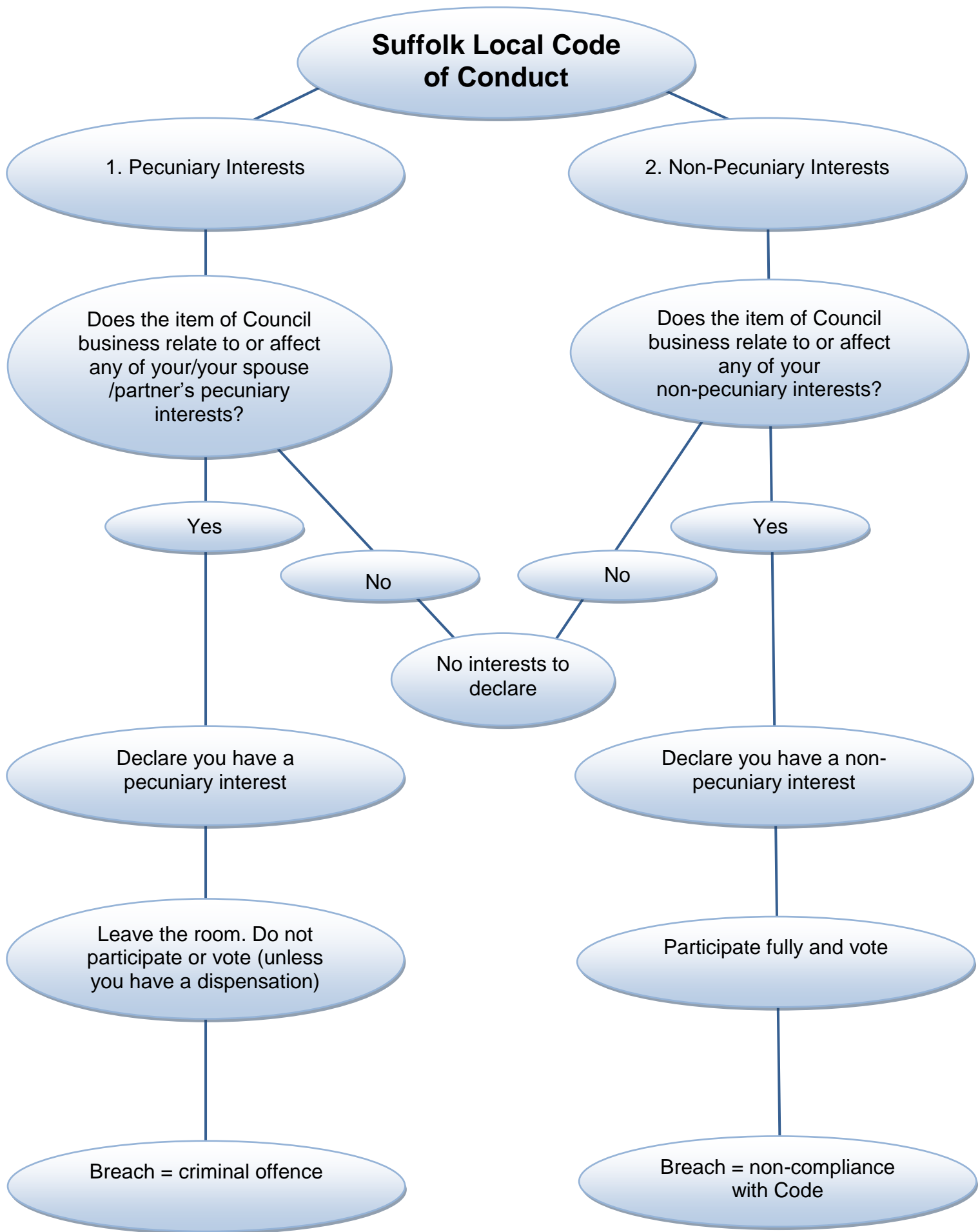
Housing Delivery – More of the right type of homes, of the right tenure in the right place

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')



Agenda Item 5

MID SUFFOLK DISTRICT COUNCIL

Minutes of the meeting of the **DEVELOPMENT CONTROL COMMITTEE A** held in the Virtual Teams Video Meeting on Wednesday, 20 January 2021 09:30

PRESENT:

Councillor: Matthew Hicks (Chair)
David Muller BA (Open) MCMI RAFA (Councillor) (Vice-Chair)

Councillors: John Field Sarah Mansel
John Matthissen Richard Meyer
Timothy Passmore Andrew Stringer

Ward Member(s):

Councillors: Helen Geake
Suzie Morley
John Whitehead

In attendance:

Officers: Area Planning Manager (JPG/GW)
Principal Planning Officer (BC/BH)
Development Management Planning Officer (AS)
Planning Lawyer (IDP)
Governance Officer (RC)

34 APOLOGIES AND SUBSTITUTIONS

Apologies were received from Councillor Rachel Eburne.

Councillor Andrew Stringer substituted for Councillor Rachel Eburne.

35 TO RECEIVE ANY DECLARATIONS OF PECUNIARY OR NON-PECUNIARY INTEREST BY MEMBERS

Councillor Matthew Hicks declared a local non-pecuniary interest in application number DC/20/04630 in his capacity as a County Councillor.

Councillor John Field declared a local non-pecuniary interest in application number DC/20/003704 in his capacity as a County Councillor.

36 DECLARATIONS OF LOBBYING

All Members of the Committee declared that they had been lobbied on application number DC/18/2146.

37 DECLARATIONS OF PERSONAL SITE VISITS

Councillor Matthissen and Councillor Mansel declared personal site visits in respect of application number DC/18/02146.

38 NA/20/7 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 9 DECEMBER 2020

It was RESOLVED:-

That the minutes of the meeting held on 9 December 2020 be confirmed as a true record and signed at the next practicable opportunity.

39 TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME

The Governance Officer reported that one petition has been received regarding application DC/18/02146 (Item 7A) with 212 valid signatures supporting the following statement:

We the undersigned petition the Council to retain the mature oak tree growing in the verge next to School Road, Elmswell, if any road-widening scheme goes ahead. This oak tree has stood in its prominent position for at least 150 years and is an impressive and much-loved landmark in the village. Its age, historical significance and ecological value mean that it must be saved and should not fall victim to any road-widening scheme undertaken because of a nearby housing development.

40 NA/20/8 SCHEDULE OF PLANNING APPLICATIONS

In accordance with the Council’s procedure for public speaking on planning applications, representations were made as detailed below:

Application Number:	Representations:
DC/18/02146	Peter Dow (Elmswell Parish Council) James Bailey (Agent) Victoria Balboa (Highways Consultant) Cllr Sarah Mansel (Ward Member) Cllr Helen Geake (Ward Member) via email
DC/20/03704	Peter Emberson (Objector) Cllr Suzie Morley (Ward Member)
DC/20/04296	Steven Bates (Objector) Laura Dudley-Smith (Agent) Sarah Cornwell (Applicant) Cllr Tim Passmore (Ward Member) Cllr John Whitehead (Ward Member)
DC/20/04630	Cllr Richard Meyer (Ward Member)

41 DC/18/02146 LAND TO THE NORTH AND WEST OF, SCHOOL ROAD, ELMSWELL, SUFFOLK

Item 7a

Application Proposal	DC/18/02146 Outline Planning Application (Access to be considered) Erection of up to 86 dwellings including car parking, on site early years provision, open space provision with associated infrastructure and vehicular access. Highways improvements including road widening and cycle/footpath Ink.
Site Location	ELMSWELL – Land to the North and West of School Road, Elmswell, Suffolk
Applicant	Christchurch Land and Estates (Elmswell South) Ltd

41.2 The Area Planning Manager presented the application to the Committee, outlining the proposal before Members, the location and layout of the site, the amendments to the cycle route to enable preservation of the tree, landscaping, and the officer recommendation of approval.

41.3 The Area Planning Manager and the Senior Development Management Engineer responded to Members' questions on issues including: the preservation of the tree, the proposed widening of the road, the location and route of the cycle path, the impact on the junction at the end of School Road, any additional sites in the area allocated in the joint local plan, and landscaping conditions.

41.4 A short break was taken between 10:27-10:40.

41.5 The Senior Development Management Engineer responded to a further question regarding the definition of severe impact when associated with highways matters.

41.6 Members considered the representation from Peter Dow who spoke on behalf of the Parish Council.

41.7 A short break was taken between 10:53-11:00 so resolve a technical issue with the livestream.

41.8 The Parish Council representative responded to Members question on issues including: the peak times for traffic.

41.9 Members considered the representation from James Bailey who spoke as the agent.

41.10 The agent and Victoria Balboa (Transport Consultant for the Agent), responded to Members questions on issues including: the safety of the pedestrian crossing on the junction, the traffic impact assessment following other developments in Elmswell and the surrounding area, and capacity improvement at the junction of School Road.

41.11 The Chair read the written statement from Ward Member, Councillor Helen Geake.

41.12 Members considered the representation from Councillor Sarah Mansel, who spoke as a Ward Member.

41.13 Councillor Passmore proposed that the application be approved subject to the following amendments:

- That the LPA is involved in ensuring that the proposed changes to the junction are safe.

41.14 The Area Planning Manager responded to Members' questions on the NPPF and Policy FC1

41.15 Councillor Muller seconded the proposal for approval.

41.16 Members debated the application on issues including: the safety of the junction, increased traffic, deliverability of the scheme, the proposed road widening.

41.17 The Senior Development Management Engineer responded to a point regarding the safety audits on site and how these were carried out prior to and after completion of developments.

41.18 Members continued to debate the application on issues including: the contents of any S278 agreement.

41.19 A short break was taken between 11:51-12:00 for the Area Planning Manager to check the proposed condition wording.

41.20 The Area Planning Manager outlined the conditions to Members with the fully worded extra conditions from the proposer and seconder.

- Additional S106 point stage 2 safety audit required to be agreed concurrent with 1st reserved matters.
- Delivery of the junction improvements prior to the first occupation any dwellings.
- Sustainability concurrent with RM
- That an informative note be added regarding high quality landscaping TBA

41.21 The Proposer and seconder agreed to the wording as read out by the Area Planning Manager.

41.22 By 6 Votes to 1

41.23 **RESOLVED**

- (1) That authority be delegated to the Chief Planning Officer to Grant Planning Permission following an updated Ecology survey for the site. Failure to secure/resolve this matter will require the application to return to development committee or be refused as deemed appropriate by the Chief Planning Officer;**

Subject to the prior agreement of a Section 106 Planning Obligation on appropriate terms to the satisfaction of the Chief Planning Officer to secure:

- **35% Affordable housing including:-**
 - Properties shall be built to current Housing Standards Technical requirements March 2015 Level 1. All ground floor 1 bed flats to be fitted with level access showers, not baths.
 - The council is granted 100% nomination rights to all the affordable units on initial lets and 75% on subsequent lets
 - All affordable units to be transferred freehold to one of the Councils preferred Registered providers.
 - Adequate parking provision is made for the affordable housing units including cycle storage for all units.
 - Commuted sum option available to be paid instead of on site provision should the LPA agree to such request.
 - Additional S106 point stage 2 safety audit required to be agreed concurrent with 1st reserved matters.

- Housing mix to be in accordance with the Strategic Housing Officer's recommendation (copy below) unless agreed in writing by the LPA

House Type	Affordable	Shared Ownership	Market	Total unit types:
4 bedroom house			17	17
3 bedroom house	4	3	17	24
2 bedroom house	8	5	13	26
2 bedroom bungalow	4		4	8
2 bedroom flat			3	3
1 bedroom flat	6		2	8
Total:	22	8	56	

- On site open space and includes management of the space to be agreed and requirement for public access at all times.
- Framework and detailed Travel Plan
- Education contribution:
 - New primary school £4,618.55 per dwelling
 - On site provision of early years reserved site (or £1,824.28 per dwelling) - Secondary school transport contribution £980.81 per dwelling
- Details to agree and completion of works for School Road Widening, Cycle/Footway and Option to require extended cycle way to back of Church to

be secured.

- S278 works for securing additional land as highways land for the future.

(2) That the Chief Planning Officer be authorised to Grant Outline Planning Permission upon completion of the legal agreement subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:

- Standard time limit (3yrs for implementation of scheme)
- Reserved Matters
- Approved Plans (Plans submitted that form this application)
- Phasing Condition (Allows phasing of the development/allows spreading of payments under CIL)
- Swift/Owl/Bee and Bat boxes/brick installation scheme to be agreed
- Hedgehog fencing scheme to be agreed
- Provision for a composting bin for each dwelling shall be provided
- SuDs conditions
- Construction Plan to be agreed.
- Level access to enable wheelchair access for all dwellings/buildings.
- Arboricultural survey for all footway/cycle routing and adjustments as necessary to be agreed.
- Highways- details of estate roads
- Highways- road serving dwellings completed to base course prior to occupation
- Highways- provision and retention of manoeuvring and parking areas
- Highways – Deliveries Management Plan
- Details of implementation, maintenance, and management of surface water drainage scheme
- Details of sustainable urban drainage system components and piped networks
- Construction and for the lifetime of the development a Surface Water Management Plan,
- Foul water strategy / Drainage scheme and Surface water management strategy
- Programme of archaeological work
- No occupation until archaeological assessment complete
- Fire hydrant provision details
- Sustainable efficiency measures
- Ecology enhancement measures to be agreed
- Lighting scheme – biodiversity
- Permitted development rights removal for extensions.
- Final details of the School Road and Church Road Junction and widening to be agreed

(3) And the following informative notes as summarised and those as may be deemed necessary:

- Pro active working statement
- SCC Highways notes
- Support for sustainable development principles

- (4) That in the event of the Planning obligations or requirements referred to in Resolution (1) above not being secured and/or not secured within 6 months that the Chief Planning Officer be authorised to refuse the application on appropriate ground

Additional S106 and conditions:

- Additional S106 point stage 2 safety audit required to be agreed concurrent with 1st reserved matters.
- Delivery of the junction improvements prior to the first occupation any dwellings.
- Sustainability concurrent with RM
- That an informative note be added regarding high quality landscaping TBA

42 DC/20/03704 LAND WEST OF OLD NORWICH ROAD, WHITTON, IPSWICH, SUFFOLK, IP1 6LQ

42.1 Item 7B

Application: DC/20/03704

Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance, and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Site location: **WHITTON-** Land West of Old Norwich Road, Whitton, Ipswich, Suffolk, IP1 6LQ

Applicant: Bellway Homes Ltd (Essex)

42.2 The Case Officer presented the application to the Committee, outlining the proposal before Members, the layout and location of the site, proposed access to the site, the contents of the tabled papers, and the officer recommendation of approval with conditions.

42.3 The case officer responded to Members questions on issues including: the number of parking spaces on site and instances of triple parking, and the proposed access to the site including the cycle route.

42.4 Members considered the representation from Steven Bates who spoke as an objector.

42.5 The Objector responded to Members' questions on issues including: acoustics,

and boundary walls proposed.

42.6 Councillor Field advised that due to technical issues he had been unable to hear the Members questions to the case officer and those of the objector. The Planning Lawyer and the Governance Officer advised that as Councillor Field had not been able to hear all of the relevant information he would be unable to participate in the debate and vote for this item.

42.7 Members considered the representation from Laura Dudley-Smith who spoke as the agent.

42.8 The Agent and the applicant, Sarah Cornwell of Bellway Homes, responded to Members' questions on issues including: the electrical ducting and cabling, the heating to be used in the dwellings, whether the properties would have fireplaces or if the chimneys on the plans were cosmetic only, access to the site and whether an alternative to a roundabout was considered, orientation of the buildings, the proposed parking on site, the boundary wall, the dwelling adjacent to the existing bungalow, and the location of the Suds on site.

42.9 Members considered the representations from Councillor Tim Passmore and Councillor John Whitehead who spoke as Ward Members.

42.10 Members debated the application on issues including: the amenities of the existing bungalow, the parking provision on site, the roundabout located at the access to the site, and the proposed heating.

42.11 Councillor Hicks proposed that the item be deferred for a review of triple parking provision boundary treatment to buffer area, Design of Plot 1, Roundabout including Cycle route, false chimneys, heating, pedestrian connectivity and Suds details.

42.12 Councillor Matthissen seconded the proposal to defer the item.

42.13 Members continued to debate the item on issues including: the buffer area, the location of suds on site.

42.14 The Case Officer provided Members with further details on the issues being debated including: that the reserved matters was guided by the Planning Inspectorates decision and conditions and the sites relationship with the bus gate.

42.15 By a unanimous vote

Note: As the Ward Member Councillor Passmore did not participate on the vote.

RESOLVED

That application DC/20/03704 is deferred for the following reasons:

- **Review of triple parking provision boundary treatment to buffer area, Design of Plot 1, Roundabout including Cycle route, false chimneys,**

heating, pedestrian connectivity and Suds details.

43 DC/20/04296 STONHAM BARNES, PETTAUGH ROAD, STONHAM ASPAL, STOWMARKET SUFFOLK, IP14 6AT

43.1 A Lunch break was taken between 13:35-13:55 after the completion of application DC/20/03704 but before the commencement of DC/20/04296.

43.2 Item 7C

Application: DC/20/04296

Proposal: Planning Application – Use of land for the stationing of 18 holiday lodges

Site location: **STONHAM ASPAL** – Stonham Barnes, Pettaugh Road, Stonham Aspal, Stowmarket, Suffolk, IP14 6AT

Applicant: Stonham Barnes Ltd

43.3 The Case Officer presented the application to the Committee, outlining the proposal before Members, the layout of the site, the contents of the tabled papers, and the officer recommendation of approval.

43.4 The Case Officer responded to Members questions on issues including: the total number of holiday lodges currently on site, the number of holiday lodges occupied during January when they should not be occupied, and the uses of the remainder of the site.

43.5 Councillor Hicks declared a site visit during the planning application of 2015.

43.6 The Principal Planning Officer and the Senior Enforcement Officer responded to further questions from Members on issues including: whether the enforcement team has any powers to control occupation before the installation of appropriate drainage conditions, the holiday lettings break-clause, the landscaping on site, pedestrian access into Stonham Aspal, and surface water drainage.

43.7 Members considered the representation from Peter Emberson who spoke as an objector.

43.8 The Ward Member, Councillor Suzie Morley, read a statement from the Parish Council.

43.9 Members considered the representation from Councillor Morley who spoke as the Ward Member.

43.10 The Area Planning Manager responded to a question regarding the type of power supply to the lodges, and advised Members that the application was in relation to the use of the land.

43.11 The Ward Member and the Senior Enforcement Officer responded to

Members' questions on issues including: residents living on the site as their main residence.

43.12 The Principal Planning Officer and the Area Planning Manager responded to questions from the Ward Member regarding the location of the boreholes on site, and the arrangements on site for the Fire services hoses.

43.13 The Senior Enforcement Officer and the Case Officer responded to further questions from Members on issues including: the recent changes in occupation of the existing units on site, occupancy rates of the units on site.

43.14 Members debated the application on issues including: whether the existing lodges are used as main residences for the lodges, over development of the site, benefits to the area, environmental impact, and any potential economic benefit.

43.15 The Area Planning Manager advised Members of the implications of 'minded to refused'.

43.16 Members continued to debate the application on issues including: sustainability issues.

43.17 Councillor Hicks proposed that the committee be minded to refuse and the application be deferred for the following reasons:

That Committee are minded to refuse the application on the grounds that the development would fail to represent good design, would not create a better place in which to live and work for the whole community of the area and would not improve the character and quality of the area.

The site is clearly visible from public vantage points and moreover the public are able regularly to be present on the Stonham Barns site to use and experience its facilities and environment. Having regard to this visibility the lodges proposed are uniform in design and spacing, the layout is linear and the development extends into open countryside that is flat and lacks topographical relief. The landscaped bunds look manmade as though they are trying to segregate rather than assimilate the site into its landscape setting and the landscape planting has yet to have any measurable impact upon views of the proposal. The lodges would be viewed as a stark man made addition to the open and rural character of this countryside setting that would harm the character and appearance of the landscape.

On this basis the development would be contrary to policies GP1 and RT17 of the MSDC LP 1998 and contrary to paragraph 124 and 160 of the NPPF February 2019.

And that the Chief Planning Officer be instructed to review and risk assess the proposed reason for refusal and concurrently seek independent landscape and design advice on the following matters ;

[a] the visual impact of the development upon the landscape character and appearance of the proposal in its context having regard go to policies GP1 and RT17

of the Local Plan and

[b] the extent to which the design and layout of the proposal takes the opportunities available for improving the character and quality of an area and the way it functions having regard to paragraphs 127 & 130 of NPPF

43.18 The proposal was seconded by Councillor Field.

43.19 By a unanimous vote

43.20 **RESOLVED**

That Committee are minded to refuse the application on the grounds that the development would fail to represent good design, would not create a better place in which to live and work for the whole community of the area and would not improve the character and quality of the area.

The site is clearly visible from public vantage points and moreover the public are able regularly to be present on the Stonham Barns site to use and experience its facilities and environment. Having regard to this visibility the lodges proposed are uniform in design and spacing, the layout is linear and the development extends into open countryside that is flat and lacks topographical relief. The landscaped bunds look manmade as though they are trying to segregate rather than assimilate the site into its landscape setting and the landscape planting has yet to have any measurable impact upon views of the proposal. The lodges would be viewed as a stark man made addition to the open and rural character of this countryside setting that would harm the character and appearance of the landscape.

On this basis the development would be contrary to policies GP1 and RT17 of the MSDC LP 1998 and contrary to paragraph 124 and 160 of the NPPF February 2019.

And that the Chief Planning Officer be instructed to review and risk assess the proposed reason for refusal and concurrently seek independent landscape and design advice on the following matters ;

[a] the visual impact of the development upon the landscape character and appearance of the proposal in its context having regard to policies GP1 and RT17 of the Local Plan and

[b] the extent to which the design and layout of the proposal takes the opportunities available for improving the character and quality of an area and the way it functions having regard to paragraphs 127 & 130 of NPPF

44 **DC/20/04630 LAND WEST OF, WATTISFIELD ROAD, WALSHAM LE WILLOWS, SUFFOLK**

44.1 Item 7D

Application: DC/20/04630

Proposal: Application under S73 of Town and Country Planning Act for approved DC/19/04273 dated 19/02/2020 – to vary Condition 2 (approved plans and documents) to facilitate increase in affordable provision from 21 to 31. Twin garage omitted and provision of sheds in rear gardens with amended fence/gate positions to plots 29 and 30. Updated site plan to show omission of twin garage and the alteration of tenure types from Market to Affordable to plots 27, 28, 29, 30, 37, 38, 54, 55, 56, and 57. As per drawings and documents submitted 17/10/2020.

Site location: **WALSHAM LE WILLOWS-** Land West of, Wattisfield Road, Walsham Le Willows, Suffolk

Applicant: Lovell Partnerships

44.2 The Case Officer presented the application to the Committee, outlining the layout of the site, the amendments made to the original plans as approved, and the officer recommendation of approval.

44.3 The Case Officer and the Area Planning Manager responded to Members' question on issues including: any amendments to the design and styles of the properties, which plots on the site will be transferred to affordable housing, the impact of the amendments on Community Infrastructure Levy (CIL), and waste collections on the site.

44.4 Members considered the representation from Councillor Richard Meyer who spoke as the Ward Member.

44.5 Members debated the application on issues including: the benefits of the increase in affordable housing numbers.

44.6 Councillor Muller proposed that application be approved. This was seconded by Councillor Mansel.

44.7 By a unanimous vote.

It was noted that Cllr Richard Meyer did not vote as he was the Ward Member.

44.8 **RESOLVED**

That authority be delegated to the Chief Planning Officer to Grant Planning Permission:

(1) Subject to the prior agreement of a Section 106 Planning Obligation on appropriate terms to the satisfaction of the Chief Planning Officer as summarised below and those as may be deemed necessary by the Chief Planning Officer to secure:

- Onsite delivery of 31 Affordable Housing Units;

- Financial contribution towards secondary School Pupils' transport.

(2) That the Chief Planning Officer be authorised to Grant Planning Permission upon completion of the legal agreement subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:

- Standard - Section 73 Time Limit Condition;
- Standard - Approved Plans and Documents Condition;
- Provision of footway, between the site and Mill Close, along Wattisfield Road, prior to occupation, which shall thereafter be retained;
- Highways Access Condition;
- Highways Visibility Splay Condition;
- Highways Turning and Parking Condition;
- Highways Bin storage and collection areas;
- Existing and proposed soft landscaping protection;
- Those previously required by the Lead Local Flood Authority;
- Those previously required by the Council's Ecology consultants;
- Play Space provision and retention;
- Construction Management - As agreed.

(3) And the following informative notes as summarised and those as may be deemed necessary:

- Pro active working statement
- SCC Highways notes
- Contaminated Land Note
- Ecology / Biodiversity Note
- S106 relates Note

(4) That in the event of the Planning obligations or requirements referred to in Resolution (1) above not being secured and/or not secured within 6 months that the Chief Planning Officer be authorised to refuse the application on appropriate grounds.

45 SITE INSPECTION

None requested.

The business of the meeting was concluded at 3.44 pm.

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Chair

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Agenda Item 7

MID SUFFOLK DISTRICT COUNCIL

DEVELOPMENT CONTROL COMMITTEE A

17 February 2021

INDEX TO SCHEDULED ITEMS

<u>ITEM</u>	<u>REF. NO</u>	<u>SITE LOCATION</u>	<u>MEMBER/WARD</u>	<u>PRESENTING OFFICER</u>	<u>PAGE NO</u>
7A	DC/20/03704	Land West of Old Norwich Road, Whitton, Ipswich, Suffolk, IP1 6LQ	Cllr John Whitehead & Cllr Tim Passmore / Claydon and Barham	Bradly Heffer	25-200
7B	DC/20/05046	Land on the North West side of, Barking Road, Needham Market, Suffolk	Cllr Mike Norris & Cllr Stephen Philips / Needham	Jasmine Whyard	201-340

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Important information that forms consideration for all applications being considered by this committee.

To avoid duplicate information being repeated in each report this information is centralised here.

Plans and Documents

The application, plans and documents submitted by the Applicant for all applications presented to committee can be viewed online at www.midsuffolk.gov.uk or www.babergh.gov.uk leading to the joint web site for the Councils.

Policies and Planning Consideration

All applications have been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. Detailed assessment of policies in relation to the recommendation and issues highlighted in each case will be carried out within the assessments attached. 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 each case are set out. 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 in the minutes for the meeting.

Note on National Planning Policy Framework 2019 (NPPF)

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.

The National Planning Policy Framework (NPPF) *"The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed."*

The NPPF also provides (para 38) that *"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."*

Note on Community Infrastructure Levy Regulations (CIL)

The Community Infrastructure Levy (CIL) is a fixed rate payment that councils can charge on new buildings in their area to off-set the impacts of additional homes and businesses on facilities such as roads, schools, open space and health centres (infrastructure) and to enable sustainable growth. Self Build and affordable housing are exempt from CIL. Section 106 legal agreements will be used alongside CIL to secure on-site infrastructure and obligations that are not infrastructure, such as affordable housing, when identified and recommended to fulfil the tests under the CIL Regulations.

Note on Obligations and Conditions

NPPF Paragraph 54 states *“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”*

For each recommendation, in accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured shall only be recommended for consideration when considered necessary to make the Development acceptable in planning terms, directly related to the Development and fairly and reasonably relate in scale and kind to the Development.

For each recommendation, in accordance with the NPPF Paragraph 55 the conditions recommended to be secured shall only be recommended when considered necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. The NPPF also provides planning conditions should be kept to a minimum.

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

Under Section 155 of the Housing and Planning Act 2016 it states, *“A local planning authority in England must make arrangements to ensure that the required financial benefits information is included in each report which is made by an officer or agent of the authority for the purposes of a non-delegated determination of an application for planning permission”.*

Financial benefits for new housing, businesses or extensions are generally as follows and are not considered to be material to the applications being determined: -

- Council Tax
- New Home Bonus
- Business Rates

Any further material or non-material benefits in addition to those listed above shall be specifically reported to members, including any interests on land owned by the Council. Community Infrastructure Levy and Section 106 obligations that may include financial benefit or adoption of land to the Council may also be sought and are considered to be material.

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

When determining planning applications, The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain whether, and if so how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising. This shall be detailed within the officer report and/or shall be detailed on any decision issued as necessary.

Note on Photos/Video Footage and other media

All sites are visited by the planning officer as part of their assessment. Officers will take photographs/video of the site for the purpose of explaining features of the site and providing context for members consideration of the proposal. These images are taken at random times and during normal working hours in accordance with the Council's lone working requirements. Photographs/Video are helpful, but it is accepted that they have limitations that may include showing appropriate scale, understanding levels and are on a snapshot in time of the local circumstances.

Protocol for Virtual Meetings

Live Streaming:

1. The meeting will be held on TEAMS and speakers will be able to join via invite only. Any person who wishes to speak at the meeting must contact Committee Services at: committees@babergmidsuffolk.gov.uk at least 24 hours before the start of the meeting.
2. The meeting will be live streamed and will be available to view on the Council's YouTube page as detailed below:
https://www.youtube.com/channel/UCSWf_0D13zmegAf5Qv_aZSg

Recording of proceedings:

1. Proceedings will be conducted in video format.
2. A Second Governance Officer will be present and will control the TEAMS call and Livestreaming.
3. Members should display the Corporate Background whilst in attendance at formal meetings; the working together logo should be used for joint meetings.
4. If you are experiencing slow refresh rates and intermittent audio you should turn off incoming video to improve your connection to the meeting (If this also does not work please turn off your own camera).

Roll Call:

1. A roll call of all Members present will be taken during the Apologies for Absence/Substitution to confirm all members are present at the meeting.

Disclosable Pecuniary Interests:

1. A Councillor declaring a disclosable pecuniary interest will not be permitted to participate further in the meeting or vote on the item. Where practicable the Councillor will leave the virtual meeting, including by moving to a 'lobby' space and be invited to re-join the meeting by the Committee Officer at the appropriate time. Where it is not practicable for the Councillor to leave the virtual meeting, the Committee Officer will ensure that the Councillor's microphone is muted for the duration of the item.

Questions and Debate:

1. Once an item has been introduced, the Chair will ask if there are any questions. Members of the Committee will be asked to use the "Hands Up" function within teams. The Chair will then ask Members to speak.
2. Any Councillors present who are not part of the Committee will then be invited to ask questions by using the "Hands up function" within teams. The Chair will then ask Members to speak.

3. At the end of the questions the Chair will ask Members whether they have any further questions before entering into debate.
4. In the instance where a Member of the Committee would like to formally make a proposal, they should raise their hand using the Hands Up function. At this point the Chair would go directly to them and take the proposal. Once the proposal has been made the Chair would immediately ask if there was a seconder to the Motion. If there is it would become the substantive Motion and the Chair would again continue down the list of Councillors until there is no further debate.
5. Upon completion of any debate the Chair will move to the vote.

Voting:

1. Once a substantive motion is put before the committee and there is no further debate then a vote will be taken.
2. Due to circumstances the current voting by a show of hands would be impractical - as such the Governance Officer will conduct the vote by roll call. The total votes for and against and abstentions will be recorded in the minutes not the individual votes of each Councillor. Except where a recorded vote is requested in accordance with the Rules of Procedure.
3. The governance officer will then read out the result for the Chair to confirm.
4. A Councillor will not be prevented from voting on an item if they have been disconnected from the virtual meeting due to technical issues for part of the deliberation. If a connection to a Councillor is lost during a regulatory meeting, the Chair will stop the meeting to enable the connection to be restored. If the connection cannot be restored within a reasonable time, the meeting will proceed, but the Councillor who was disconnected will not be able to vote on the matter under discussion as they would not have heard all the facts.

Confidential items:

1. The Public and Press may be Excluded from the meeting by resolution in accordance with normal procedural rules. The Committee Officer will ensure that any members of the public and press are disconnected from the meeting.

Agenda Item 7a

Committee Report

Item 7A

Reference: DC/20/03704
Case Officer: Bradly Heffer

Ward: Claydon & Barham.

Ward Member/s: Cllr Timothy Passmore. Cllr John Whitehead.

RECOMMENDATION – APPROVAL OF RESERVED MATTERS WITH CONDITIONS

Description of Development

Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Location

Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

Expiry Date: 22nd January 2021

Application Type: RES - Reserved Matters

Development Type: Major Large Scale - Dwellings

Applicant: Bellway Homes Ltd (Essex)

Agent: Ms L Dudley-Smith

Parish: Whitton

Site Area: 10.2 hectares

Density of Development:

Gross Density (Total Site): 18.6 dwellings per hectare

Net Density (Developed Site, excluding open space and SuDs): 30 dwellings per hectare

Details of Previous Committee / Resolutions and any member site visit: See below

Has a Committee Call In request been received from a Council Member (Appendix 1): No

Has the application been subject to Pre-Application Advice: Yes – reference DC/19/04232.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

Members will recall that this reserved matters proposal was reported to Committee at the meeting held on 20th January 2020. At that meeting Members resolved to defer determination of the proposal in order that the following issues could be considered further:

- Triple parking provision
- Boundary treatment for buffer area
- Design of Plot 1
- Roundabout including cycle route

- **False chimneys**
- **Heating**
- **Pedestrian connectivity**
- **SuDS details**

The original report to Committee is set out below, and this is followed by an update section (section 14) which advises on the above points following deferral by Members.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

NPPF - National Planning Policy Framework

Adopted Core Strategy

CS01 - Settlement Hierarchy
 CS02 - Development in the Countryside & Countryside Villages
 CS04 - Adapting to Climate Change
 CS05 - Mid Suffolk's Environment
 CS06 - Services and Infrastructure
 CS09 - Density and Mix

Adopted Core Strategy – Focused Review

FC01 - Presumption In Favour Of Sustainable Development
 FC01_1 - Mid Suffolk Approach To Delivering Sustainable Development
 FC02 - Provision And Distribution Of Housing

Adopted Local Plan

SB02 - Development appropriate to its setting
 GP01 - Design and layout of development
 H02 - Housing development in towns
 H03 - Housing development in villages
 H07 - Restricting housing development unrelated to needs of countryside
 H13 - Design and layout of housing development
 H15 - Development to reflect local characteristics
 H16 - Protecting existing residential amenity
 H17 - Keeping residential development away from pollution
 CL05 - Protecting existing woodland
 T04 - Planning Obligations and highway infrastructure
 T09 - Parking Standards
 T10 - Highway Considerations in Development
 RT04 - Amenity open space and play areas within residential development

Neighbourhood Plan Status

This application site is not within a Neighbourhood Plan Area.

Consultations and Representations

During the course of the application Consultation and Representations from third parties have been received. These are summarised below.

A: Summary of Consultations

Town/Parish Council (Appendix 3)

Claydon and Whitton Parish Council has commented on the proposals as follows:

Claydon and Whitton Parish Councillors have the following concerns:

- *The first archaeological dig in this location recommended a further independent dig, but there appears to be a suggestion that the dig will be performed by the developer.*
- *Councillors remain concerned about the implications of a roundabout to access and exit the new estate. There is no need for a roundabout as traffic should not be turning left out of the estate - this route is only for buses, cyclists, pedestrians and emergency vehicles. Councillors are worried that a roundabout in this location will encourage new residents to turn left and use the restricted road to reach the A14 more quickly. Councillors ask that further thought is put into how to prevent vehicles using the restricted route through Claydon, for example by possibly using cameras that are followed up with fines for using the road.*
- *Councillors are concerned that insufficient thought has been applied to congestion issues for new residents to leave the estate for the A14, as this road is frequently very busy and will be a lot busier with all the building happening in this area.*
- *Councillors are concerned that Plot 1 continues to have a significant impact on existing residents, as it overlooks an annex that is currently inhabited by an elderly couple.*
- *Further clarification is required regarding raised bus stops on the estate, as this formed part of the appeal paperwork.*

Bramford Parish Council has no comments to make on the proposal.

National Consultee (Appendix 4)

Anglian Water Services has identified that the proposed method of surface water discharge does not relate to an Anglian Water owned asset. It is advised that the Local Planning Authority should seek the advice of the Lead Local Flood Authority or Internal Drainage Board.

Highways England has no objection to the proposal.

NHS (Ipswich and East Suffolk CCG) has advised it has no objection to the proposals, stating that it '...is satisfied that the basis of a request for CIL contributions is consistent with the Position Statement produced by Babergh and Mid Suffolk District Councils. The consultation response identifies that the Chesterfield Drive Practice, and the Deben Road Surgery would be the facilities impacted by the development.

Natural England has confirmed it has no objection to the proposals, subject to appropriate mitigation being secured. In this regard, Members are advised that the s106 agreement attached to the grant of outline planning permission included a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) contribution.

County Council Responses (Appendix 5)

SCC Highway Authority has no objection to the proposals, subject to conditions being added to a reserved matters approval.

SCC as Lead Local Flood Authority has recommended approval of the application subject to the imposition of a condition. This is included in the recommended list at the end of this report.

SCC Archaeological Service has identified that the archaeology condition imposed by the Planning Inspector at the time of the appeal approval does not meet its requirements, bearing in mind that archaeological deposits are likely to be encountered on the site. On this basis, it is recommended that the 'standard' conditions are imposed in the event that reserved matters approval is granted.

SCC Development Contributions Manager has identified that as part of the outline permission a s106 agreement was completed and the necessary mitigation secured.

SCC Travel Plan Officer has no comments to make on the application.

SCC Public Rights of Way Officer has identified that the site does contain Footpath 1 and Footpath 15 Whitton, and that these appear to have been accommodated in the submitted plans. A range of advisory notes is also included in the consultation response.

SCC Fire and Rescue Service has noted that a requested condition was included on the outline planning approval and this is relevant to the reserved matters proposal.

Internal Consultee Responses (Appendix 6)

The **Contaminated Land Officer** has no comments, observing that all issues were dealt with at the outline application stage.

Environmental Health (Noise/Odour/Light/Smoke) Officer has identified that noise issues are to be addressed via condition imposed on the outline planning approval and no further comment is made.

Environmental Health (Sustainability) Officer identifies that the Council declared a climate emergency in 2019 and has an aspiration to become carbon neutral by 2030. A Sustainability and Energy Strategy condition is recommended for inclusion as part of a reserved matters approval.

Place Services Ecology has advised it has no objection to the proposal. Conditions are recommended to be attached to an approval of reserved matters.

Place Services Landscape has identified that the detailed points raised in its consultation response can be addressed through conditions.

The **Public Realm Officer** has no objections, noting that a generous area of public open space and a toddlers' play area is included in the proposed development. In addition, the proposals to create ecologically rich open space is welcomed.

B: Representations

At the time of writing this report at least 15 online comments have been received. It is the officer opinion that this represents 15 objections. A verbal update shall be provided, as necessary.

Views are summarised below:-

- Affects local ecology and wildlife
- Air pollution
- Application is lacking information
- Archaeological importance
- Boundary issues
- Conflict with district plan
- Design
- Dominating and overbearing
- Drainage
- Fear of crime
- Health and safety
- Inadequate access
- Inadequate parking provision
- Increased danger of flooding
- Increase in anti-social behaviour
- Increase in amount of litter in the area
- Increase traffic and highways issues - Old Norwich Road already extremely busy, particularly during rush hour so all the extra cars from this proposed development would create further road safety problems
- Landscape Impact
- Noise
- Strain on existing community facilities (doctors, schools, dentists etc.)
- Unsustainable

(Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation.)

PLANNING HISTORY

REF: 1832/17	Outline Application (Access to be considered) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works	DECISION: REF 28.03.2018
REF: DC/20/03703	Discharge of Conditions Application for 1832/17 granted under Appeal Reference APP/W3520/W/18/3200941- Condition 5 (Proposed Primary Access), Condition 6 (Estate Roads and Footpaths), Condition 7 (Construction Management Plan), Condition 8 (Discharge of Surface Water), Condition 9 (Construction Surface Water Management Plan), Condition 11 (Construction Environmental Management Plan), Condition 12 (Tree Survey), Condition 16 (Feasibility Study), Condition 17 (Acoustic Measures), Condition 18 (Surface Water Drainage Scheme), Condition 19 (Implementation,	DECISION: PCO

Maintenance and Management), Condition 20 (Biodiversity Enhancement Plan), Condition 21 (Refuse/Recycling Bins) and Condition 24 (Flood Risk Asset Register)

REF: DC/20/03704

Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

DECISION: PCO

PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

- 1.1 The site for this proposal is a large, irregular-shaped parcel of land with a given area of 10.2 hectares, located between Old Norwich Road Whitton, and the A14 trunk road linking Ipswich with Bury St Edmunds. Topographically, it has an undulating character and it is currently unused, having previously been utilised for arable agricultural purposes.
- 1.2 Where the site abuts Old Norwich Road it also surrounds a modest ribbon of residential development that is located on the western side of the road. Another notable feature is a linear woodland area that is within the site and is adjacent to the defined northern boundary. The southern boundary of the site abuts open land; the line of which contains part of the boundary between Mid Suffolk District and Ipswich Borough to the south. This line also contains the route of a public right of way. A further notable feature are the overhead power lines that cross the southern half of the site, and are a dominant feature in the local landscape.

2. The Proposal

- 2.1 The application put forward for Members' consideration is a reserved matters proposal for the erection of a new estate of 190 no. dwellings on the identified site. The submitted plan shows a new vehicular access being provided from Old Norwich Road. The road junction itself would take the form of a roundabout. The proposed access would lead to a main spine road, to the south which would be an area of public open space having an approximate area of 1.85 hectares. The remainder of the site would be occupied by the proposed dwellings, accessed by a series of culs-de-sac, with the western half of the developed area incorporating a would include a more permeable road layout.
- 2.2 Generally, the location of dwellings would follow a perimeter block form, whereby dwellings address the road network directly. However, there are instances within the development of private drives, each serving a limited number of units. The dwellings themselves would comprise a range of detached, semi-detached and terraced units – predominantly two storeys in height but with

some instances of bungalows. The architectural approach taken on the site is of traditionally-designed and proportioned buildings.

- 2.3 Members should note that, in allowing the outline application at appeal, the Inspector specifically identified that a parameter plan should guide development on this site, and a condition was imposed to that effect as follows:

'The development hereby permitted shall be carried out in accordance with the following drawings and/or such other drawings/documents as may be approved by the Local Planning Authority in writing pursuant to other conditions of this permission or such drawings/documents as may subsequently be approved in writing by the Local Planning Authority as a non-material amendment following an application in that regard: Site Location Plan (Drawing No 1005); Parameters Plan (Drawing No 3502 revA)'

- 2.4 Bearing the above in mind, it is considered that the general arrangement of built form, and the provision of open space on the site was established at the outline stage. The application submission was accompanied by a Design and Access Statement, and extracts from the document are included below in order to provide Members with further context in relation to this reserved matters submission:

'...The layout responds to the constraints and opportunities that the site presents to ensure the proposed plan is legible in its form, creating a good quality semi-urban environment for potential residents and visitors. The 190 plots are to offer a range of dwelling types, sizes and tenures...the layout accommodates 67 affordable units which equates to a total of 35% affordability across the proposed site... The architectural design of the proposed residential development will guide the choice of materials to ensure distinctive streets and spaces are created within the new public realm...It is important that the new development draws upon the more traditional characteristics of the local vernacular to reinforce the sense of place established by the development. The new homes will predominantly be brickwork with additional boarded finishes to some key properties...This new residential area will benefit visually from the mature wooded landscape framework that lies to the west and north and which will be visible as a green backdrop from parts of the proposed development's public realm...Street trees will largely comprise of varieties of indigenous species...The nearest existing bus stops to the site are situated on Old Norwich Road; there are stops both close to the northern and southern boundaries of the site heading both north and south. The bus currently takes approximately ten minutes to reach the centre of Ipswich...All plots will have the use of either parking spaces or garages with parking spaces. In line with Suffolk Parking Standards, a minimum of two spaces are provided per plot for two bedrooms or more with three spaces provided for four bedroom properties...Sustainable drainage (SuDS) strategy to manage surface water run-off from the site and to minimise the risk of flooding...'

The full Statement is available to view on the Council's website.

3. The Principle Of Development

- 3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

- 3.2 The site for this proposal is located on land that is currently unallocated for development, as defined in the adopted development plan. This point is noted in a number of representations that have been received from local residents. However, within the emerging Joint Local Plan, the site is included within the Babergh Ipswich Fringe in the Settlement Hierarchy. The relevant policy of the JLP (policy SP03 – Settlement Hierarchy) identifies inter alia that Ipswich Fringe settlements will act as a focus for development. In identifying the above, officers are of course mindful that limited weight may be attached to the policies in the JLP at this stage in the Local Plan process. That said, it is useful as context for Members as it does indicate a preferred 'direction of travel' for this type of location, in planning terms.
- 3.3 Notwithstanding the above summary of the policy position, in the case of the determination of this reserved matters proposal, it is considered that the outline planning permission granted by the Planning Inspectorate via the appeal against the Council's refusal of outline planning application ref. 1832/17 (appeal ref. APP/W3520/W/18/3200941) clearly establishes the acceptability of residential development taking place on the identified site and is the starting point for the decision now to be taken. Members are not tasked with re-considering the planning permission from scratch; rather, they are considering those details reserved under the planning permission for determination at this later stage. The principle of development is therefore effectively fixed, subject to the conditions attached to the outline planning permission.
- 3.4 Members will recall that this current application site formed part of a larger site for which outline planning permission was sought, under planning application ref. 1832/17, as follows:
- Outline Application (Access to be considered) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works.*
- 3.5 The application was subsequently refused by the Council via notice dated 28th March 2018. The refusal was subsequently appealed and the Inspector issued a split decision on the proposal following a Public Inquiry. While development was refused on the northern parcel of land identified in the submission, outline planning permission was approved on the southern parcel of land (the site for this current proposal).
- 3.6 In allowing the appeal insofar as it relates to the current reserved matters site, the Inspector commented as follows:
- '...Turning to the possibility of development on the southern parcel only, it is clear that the benefits would be largely the same, although reduced to a degree. However, the harm associated with this scale of development would be significantly less than for the entire scheme. Harm to landscape character and appearance would be at a level which would be very much reduced and would be capable of mitigation. Additionally impact on the highway network would be likely to be of a significantly lesser magnitude even if there is a delay in providing an improved Bury Road junction arrangement. Although there is still conflict with the development plan the benefits of the smaller scheme are compelling and outweigh the limited development plan conflict. In relation to the reduced scheme on the southern parcel of land the harm would not significantly and demonstrably outweigh the benefits. The presumption in favour of sustainable development here means that planning permission should be granted for the scheme on the southern parcel of land...'*
- 3.7 In summary, the acceptability of the identified site to accept 190 no, dwellings is established in principle and is the starting point for the determination of this reserved matters proposal.

4. Nearby Services and Connections Assessment Of Proposal

- 4.1. The location of the site means that local schools are within walking and cycling distance, as are a variety of other local services. Furthermore Old Norwich Road is a designated cycleway and is on a bus route that would enable passenger connections to the wider area including Ipswich, and Claydon to the north, without reliance on the private car. Clearly the status of Ipswich means that a significant range of facilities and services may be accessed by future residents of the development.
- 4.2. It is also noted that the Anglia Retail Park and the White House Industrial Estate are located to the south-west of the site.

5. Site Access, Parking And Highway Safety Considerations

- 5.1. As identified in the NPPF (paragraph 108) and reflected in relevant development plan policies, the impact of development proposals on the local highway network is an important planning consideration. Further, at paragraph 109 the NPPF states that ‘...Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe...’
- 5.2. In granting outline planning permission for the development of the identified land, the Inspector clearly sets out that the means of access to the site is a reserved matter for which further approval is to be obtained. That said, the approved parameters plan (ref. 3502 rev A) does show a point of access off Old Norwich Road, and the relevant condition imposed by the Inspector does require development to be carried out in accordance with this identified drawing (and/or such other drawings/documents as may be approved). Therefore the *position* of the access point is established, and it is the details of the access that have to be considered under this reserved matters submission.
- 5.3. Members will note that the proposed form of access to serve the site takes the form of a roundabout junction. Some representations received in relation to the application have expressed concerns with regard to this form of junction, particularly as it would allow vehicles to turn left out of the site and therefore head north along Old Norwich Road. The road contains a bus gate – located approximately 620 metres north of the northern site boundary - which precludes general traffic from using this route, with the exception of local buses, cycles and permit holders.
- 5.4. Members are advised that the form of junction i.e. roundabout is provided as requested by the County Highway Authority, as a result of pre-application consultation. This junction has been safety-audited, as part of an overall safety audit submitted for Old Norwich Road. It is understood that the roundabout arrangement provides for the safest form of junction – particularly bearing in mind that the road also forms part of the national Sustrans network. Inter alia the design of the junction includes separate cyclist lanes heading in both northerly and southerly directions from the access, along Old Norwich Road. In relation to the access arrangement, the Highway Authority has provided further clarity on this point as follows:

‘The layout of the access needed careful consideration as the only vehicles using Old Norwich Road to the north of the access will be buses, cyclists and residents of existing dwellings to the north of the access. Also, National Cycle Route 51 route is on Old Norwich Road. By having an access off Old Norwich Road, drivers who are exiting the site may be blasé as the traffic coming from the north will be very light and not look properly. If the road layout were changed, so the priority route was into the site and Old Norwich Road to the north accessed off it, this would mean the cyclists and buses would not have priority; not preferred for sustainable transport. A roundabout was considered to be the

best approach for the site access. It has been safety audited. Also, if drivers wanted to go towards the bus gate, I don't expect any junction layout would put them off.'

- 5.5 In relation to parking provision on the site, Members are advised that the submission includes a parking strategy plan, and a parking allocation plan. This shows that parking provision for residents would be on-plot, with visitor parking spaces also provided. The provision would be in accordance with the adopted Parking Standards of the Council as follows:
- 1 space per 1 bed dwelling
 - 2 spaces per 2 and 3 bed dwelling
 - 3 spaces for 4 bed dwellings
 - 0.25 spaces per dwelling for visitor parking (a total of 50 no. spaces provided across the site).
- 5.6 Cycle parking would be provided in garages, or garden sheds on plots where a garage facility is not provided.
- 5.7 Members are advised that there are some instances in the layout where parking spaces are provided in a triple row arrangement (including a garage space). Members are further advised that this arrangement has been accepted by the Highway Authority, on the basis that the instances are in areas that would be served by private drives, where this arrangement is deemed to be acceptable.
- 5.8 Lastly, in its consultation response the Highway Authority requested inter alia the inclusion of conditions relating to electric vehicle charging points and a construction management plan. However, these issues were covered by conditions imposed by the Inspector in allowing the appeal – it is not necessary to re-impose them on a reserved matters approval.

6. Layout and Design

- 6.1 The NPPF identifies that good design is a key aspect of sustainable development. A collaborative approach to the creation of good places is also encouraged. Developments which are poorly designed and fail to realise opportunities to improve the character of the area in which they would be located should be refused. At the local level, several core strategy and local plan policies identify the Council's aim to secure high quality developments within the district. Members will also be aware that the recent White Paper 'Planning For The Future' issued by central government reinforces the need for quality design to be achieved in development proposals.
- 6.2 The submitted reserved matters proposals have been guided by the parameters plan that was approved by the Appeal Inspector as part of the outline planning permission. This plan shows the arrangement of new land uses on the site, and establishes the following:
- Open space area including children's play, informal recreation, strategic planting and SuDs – this space comprising approximately the southern third of the site.
 - A main area of residential development that occupies the majority of the site area and includes access roads and private drives. Buildings up to 3 storeys (12m to ridge) permitted.
 - A 'belt' of residential development adjacent to the existing ribbon of development, that would contain buildings up to 2 storeys (9.5 metres to ridge).
 - Strategic landscaping areas including the established belt of trees to the north of the site and also a linear buffer between the northern half of the existing ribbon development and the application site.

- The point of vehicular and pedestrian access to the site from Old Norwich Road, together with the land required for the main access road to the site. Also, retention of the line of the public footpath on the southern boundary of the site.

6.3 The fact that the parameters plan is specifically identified in a condition attached to the grant of outline planning permission means that it has significant weight as a material consideration in the determination of this reserved matters proposal. Detailed proposals for the site would be expected to follow the parameters that are established by the plan.

6.4 In this regard Members are advised that the reserved matters proposal put forward for consideration does incorporate the parameters that are shown on the outline permission plan, in the organisation of the layout. The vehicular access to the site is positioned to match that shown on the plan.

6.5 In relation to the main area of residential development, material submitted with the application includes a plan that identifies two character areas within the development, consisting of 'The Street' and 'The Rambles'. The first of these, 'The Street' would include the development immediately adjacent to the main spine roads through the site, and is described as follows:

'This character area comprises the main access routes through the site, and is defined by its relative formality and regimentation. The dwellings will be faced in brick and there will be consistent roof and brick colours across several neighbouring units. Boarding will be applied consistently to corner turning units at key locations. Units will be positioned with some uniformity to setbacks, and will be oriented along the line of the road. The ordered character will be reinforced by the use of hedgerows to delineate plot boundaries and help to screen parked cars.'

6.6 The area identified as 'The Rambles' is characterised as follows:

'Further into the site, The Rambles character areas are set around predominantly shared surfaces, private drives, curved footpaths and green spaces. Here, the built form becomes more diversified and less ordered. In contrast with The Street character area, the material palette will feature roof and brick colours distributed in an assorted manner. Plot setbacks will vary and some units will be angled to suit site specific conditions.'

6.7 A variety of detached and semi-detached dwellings, with some instances of terraces, is proposed across the site, accessed via either culs-de-sac or through a looped road system. The general arrangement of dwellings is of perimeter blocks served by a permeable road layout, or towards the north and east of the site, a series of smaller clusters of dwellings arranged around individual private drives. Members are advised that although the parameter plan did allow 3 storey development on the majority of the residential part of the site, the proposed buildings would not exceed 2 storeys in height, with some instances of bungalow development.

6.8 The proposed layout also includes the significant area of open space that occupies much of the south of the site. This part of the site has an overall area of 1.85 hectares and it would contain a play area, informal recreation space, SuDs and strategic planting – all as established in the parameters plan. Furthermore, the established tree belt on the northern boundary (as well as a green 'projection' south west from the main belt area) are retained as part of the reserved matters proposal – again in accordance with the plan.

6.9 In terms of the design of the proposed dwellings, these follow a traditional architectural approach, which is considered to be appropriate in the context of the surroundings. The majority of the units

would be constructed in brickwork, with some clad in boarding. The roofs of the buildings would be clad in tiles.

7. Landscape Impact, Trees, Ecology, Biodiversity And Protected Species

- 7.1 In relation to landscape impact, at the time of the appeal, the Planning Inspector considered the application site to be well-contained, and development would therefore have a '...minor...' impact overall in the local landscape. The landscape was described by the Inspector as follows:

'It is relatively flat and close to the urban limits of Ipswich. Indeed I understand that the southern site boundary abuts land allocated for development. The land is perceived more as urban fringe than open countryside, and this is emphasised by the 2 lines of pylons and cables which cross it. In my judgement it has a moderate to low sensitivity to development, and the scheme would at worst have a moderate magnitude of impact on the character of the area...The southern parcel is relatively enclosed in visual terms. It is bounded by development (or land allocated for development) to the south, and there are a number of dwellings to the east along Old Norwich Road. When added to the enclosure provided by the tree belt to the north and the A14 to the west the sense of visual enclosure is significant. In this respect it is correct to describe the land as being of limited sensitivity to development. Views into the southern parcel are heavily restricted, though I acknowledge that it would not be possible to hide the proposal entirely. Some perception of houses would be possible above trees and between landscaping. Nonetheless the visual impact of development would be minor.'

- 7.2 As identified elsewhere, the parameter plan approved at appeal established the location of various land uses on the site and these are reflected in the proposal brought forward for Members' consideration. The consultation response that has been received from the Council's Landscape Consultant (following receipt of a revised landscape masterplan) confirms that there is no objection to the proposal on grounds of landscape impact. Conditions are recommended, which would be imposed if the recommendation of reserved matters approval is agreed. These include a detailed landscaping scheme and also a landscape management plan.
- 7.3 In relation to trees, as identified elsewhere, the site benefits from significant existing tree and hedgerow planting, primarily on the boundaries of the site. The most immediately noticeable features are the hedging and trees along the boundary of the site with Old Norwich Road, and also the established tree belt to the north of the site. There is also established planting on the western boundary with the A.14 and parts of the southern boundary. In allowing the appeal the Inspector required, by condition, the submission of a tree survey and arboricultural method statement. Members are advised that the Arboricultural Officer has considered the information submitted to discharge the condition and has advised it to be sufficient.
- 7.4 As regards issues of ecology and biodiversity, conditions attached to the outline planning permission required the submission of a Landscape and Ecological Management Plan, reptile method statement and skylark mitigation strategy. This, on the basis that ecological investigation carried out at the outline stage established the ecological value of the site, together with necessary measures to mitigate impact of development on ecology. It is also noted that the s106 agreement that is attached to the outline permission includes inter alia a contribution of £200 per dwelling to be paid towards the Council's Recreational disturbance Avoidance and Mitigation Strategy (RAMS).
- 7.5 Members are advised that, as part of this reserved matters submission, the applicant has included an updated Ecological Impact Assessment, in addition to the Habitats Regulations Assessment

and various landscaping details. On this basis the Council's Ecological consultants have advised that there is sufficient ecological information available for determination. The consultants' advice is that no objection to the proposals is raised, subject to a condition being imposed that requires the submission of a Biodiversity Enhancement Layout. The consultant also notes the conditions that were imposed by the Inspector, and the importance that these are properly addressed to ensure that impacts are properly mitigated.

8. Land Contamination, Flood Risk, Drainage and Waste

- 8.1 Members will note that in relation to land contamination, the Officer identifies that potential issues were considered at the time of the outline planning application. In allowing the appeal proposal the Inspector inter alia imposed the following condition:

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

- 8.2 In this regard, further investigation has taken place in relation to land contamination. This has found no issues of concern.
- 8.3 In relation to flood risk and drainage, Members are advised that the site is wholly within Flood Zone 1 as defined on the Environment Agency mapping system. Flood Zone 1 is defined as '...Land having a less than 1 in 1000 annual probability of river or sea flooding...' Nevertheless, as the site is more than 1 hectare in size, development proposals have to be accompanied by a Flood Risk Assessment. As with land contamination, the issue of flood risk was considered at the outline application stage (and also during the subsequent appeal). Again, in allowing the appeal proposal insofar as it related to the current site, a specific condition was imposed that required the submission of a surface water drainage scheme, carried out in accordance with the FRA that accompanied the outline planning application submission. The submission of this scheme was to be concurrent with the first reserved matters application, and Members are advised that the details are currently with the Council for consideration.
- 8.4 Notwithstanding the fact that the site is within Flood Zone 1, neighbouring representations have identified that localised ground conditions had meant that at one point, pre-submission, a wetland area was proposed as part of the development. However, it appears that the ground conditions that would have enabled the creation of a wetland area were in fact created by a broken drainage pipe. This information has been drawn to the attention of the applicant, and the following response has been received:

'On initial study of the site including walkover, it seemed that there was an area to the east of the site adjacent to Old Norwich Road where a naturally occurring spring/wetland was present. The initial designs sought to enhance this area. However, as we now know that the nearby Anglian Water mains had a major leak and was in fact causing surface water flooding as a result. As Anglian Water have since repaired the leak and the area has since dried the creation of a new wetland area would not be appropriate, due to the existing permeable sub strata.'

- 8.5 In relation to waste disposal the proposal put forward for Members' consideration includes a plan that shows the provision of bin collection points within the development, which would take place within front curtilage areas of individual dwellings.

9. Heritage Issues [Including The Impact On The Character And Appearance Of The Conservation Area And On The Setting Of Neighbouring Listed Buildings]

- 9.1 Members will be aware of the duty placed on Local Authorities to protect heritage assets – as emphasised in national planning policy and reflected in the Council’s own policy base. Members are advised that there are not any listed buildings within the vicinity of the application site whose setting would be impacted by the proposed development. The nearest heritage asset is the conservation area within Whitton, which is located to the south of the site and covers the junction of Old Norwich Road with Whitton Church Lane. Members are advised that this conservation area is outside of the Mid Suffolk District boundary – being located within Ipswich Borough. Nevertheless, the impact of development proposals on the character of the conservation area has to be considered, and this was the case at the time of the outline application and subsequent appeal. In this regard, the Inspector commented on this issue as follows:

‘...The significance of the Whitton CA stems largely from remaining elements of the relationship between buildings, street pattern, open spaces and the rural hinterland to the north...There is no disagreement between the main parties that the proposal would cause less than substantial harm to the character of the CA. No harm is alleged to the appearance of the CA itself or to listed buildings or their settings within it. I have no reason to disagree with these points...’

- 9.2 The Inspector did identify that the main impact arising from the proposal (at that time for 315 units) would arise from traffic. In that regard the following further comments were made:

‘...Noise increases would be at or close to the lowest observable adverse effect level, and even if slightly greater would be unlikely to significantly affect the appreciation of the significance of the CA.’

- 9.3 In concluding, the Inspector reiterated the statutory position whereby great weight attaches to any identified harm to a heritage asset, and this has to be balanced against the benefits of the proposal. Clearly, in granting outline planning permission for the development of the identified site he felt that the benefits of the proposal did so – in recognition that the harm identified i.e. to the character of the Whitton conservation area was in any event judged to be at the lower end of the scale.
- 9.4 In relation to impacts on archaeology arising from the development, Members will note that SCC Archaeology, in its original consultation response, identified that the requirements of the archaeological condition imposed by the Inspector as part of the outline approval did not achieve what would, in SCC Archaeology’s opinion, be required in order to fully quantify the likely archaeological value of the site. Representations from local residents have also identified the likely sensitivity of the site as being an important point to consider properly.
- 9.5 As a planning principle, the fact that an archaeological condition has been imposed by a Planning Inspector at outline approval stage would mean that the further imposition of a condition at reserved matters stage to address the same issue would not meet the relevant tests e.g. necessity and reasonableness. That said, SCC Archaeology’s concerns in this regard have been raised with the developer and further discussion is taking place. An update for Members will be provided at the Committee meeting.

10. Impact On Residential Amenity

- 10.1 The impact of proposed development on residential amenity is, of course, a fundamental planning consideration. This is reflected in local plan policies SB2, H13, and H16 – all of which identify the need for new developments to not adversely impact amenity.
- 10.2 In the case of this reserved matters submission, the site abuts established residential development to the west. To this end, proposed dwellings adjacent to the boundaries have been positioned in order that potential for overlooking is limited. In addition, it is considered that the space between buildings is sufficient to protect against unacceptable loss of privacy. The impact would be further mitigated by established planting along sections of the shared boundary which would filter views further. It is also the case that a landscaped buffer would create further distance between existing and proposed dwellings along a significant stretch of the western boundary.
- 10.3 A specific concern has been raised by the potentially overbearing impact of the proposed dwelling located on plot 1 in relation to the nearest existing dwelling, identified as the 'Old Filling Station'. The proposed dwelling, a two-storey house, would be located approximately 3 metres away from the shared boundary, and would be on an approximate northwest/southeast axis. The arrangement of accommodation in the building would mean that the flank wall facing the 'Old Filling Station' would only contain obscure glazed windows. It is considered that the combination of factors outlined would mean that an unacceptable loss of amenity to the identified property would be avoided.
- 10.4 In regard to the interface of the development with other boundaries it is considered that amenity issues would not arise *from* the proposed development but rather with impacts upon it. For example, the site's western boundary abuts the A.14 trunk road and although the site is in an elevated position in relation to the road, there will be some noise impacts. In this regard, the use of acoustic barriers to address this issue was identified, and a specific condition (no. 17) was imposed by the Inspector as follows:
- Concurrent with the first reserved matters application, and any subsequent reserved matters application, details of a scheme for acoustic measures to protect residential amenity shall be submitted to and approved in writing by the Local Planning Authority and implemented in full in accordance with the approved details prior to the first occupation of the dwelling to which the measures relate.*
- 10.5 In addition, it is the case that the outline planning permission included a condition for the submission of a Construction Management Plan, inter alia the aim of which is to reduce construction impacts on local residents.

11. Planning Obligations / CIL (delete if not applicable)

- 11.1 Members are advised that, during the appeal process following the Council's refusal of the outline planning application, a s106 agreement was drafted that would secure the mitigation required in the event that the proposal were approved by the Inspector. In his decision letter he comments on the agreement as follows:

'An obligation pursuant to S106 of the 1990 Act was submitted, by agreement, subsequent to the close of the inquiry. The obligation deals with a number of matters relating to financial contributions, the provision of affordable housing, open space provision and management, and travel plans. I have taken note of the statements of compliance with the Community Infrastructure Levy Regulations which were submitted with evidence. On the basis of the contents of the obligation and the compliance statements I am content that all matters conform to the CIL Regulations and that the obligation can be taken into account if planning permission is to be granted.'

11.2 For Members' information, the terms of the completed agreement can be summarised as follows:

- Provision of 35% affordable housing on the site
- Provision of Public Open Space on the site (including play equipment, landscaping, paths and access arrangements, street furniture and fencing) to be transferred to a Management Company
- A contribution of £348 450 towards the costs of highway junction improvements at the Old Norwich Road/ Whitton Church Lane junction and the Old Norwich Road/Bury Road junction)
- A contribution of £4 120.29 per dwelling towards the cost of building a new primary school.
- A contribution of £296 per dwelling towards the cost of land for a new primary school.
- A contribution of £200 per dwelling to be paid towards the Council's Recreational disturbance Avoidance and Mitigation Strategy (RAMS)
- Provision of Travel Plans (interim and full) and also provision of Residential Travel Packs for each dwelling.

11.3 In its consultation response the SCC Development Contributions Manager has commented that '...The planning obligations previously secure under the first planning permission must remain in place if reserved matters approval is granted...' and this would be the case. In addition, Members will note that the NHS has advised that mitigation of impacts on its local service provision would be secured through a CIL funding bid.

12. Parish Council Comments

12.1 The comments that have been received from Claydon and Whitton Parish Council are fully acknowledged and appreciated. Taking each of the points raised in turn, the following comments are made:

- As explained elsewhere, the condition imposed by the Inspector does not meet the requirements of SCC Archaeology, and this issue is being considered further. In any event, the investigation on site would normally be undertaken by contractors appointed by the developer, with the results considered by the County Council.
- The form of access to the site follows the requirements identified by SCC Highways.
- The comments regarding traffic impacts arising from the development are noted. However, this aspect of the development proposals was considered at the outline application stage, and subsequently at the Appeal. The Highway Authority did not raise an objection to the proposal and the Inspector did not do so either. Localised improvements to the highway, secured through s106 agreement, are identified elsewhere in this report.
- The impact of the dwelling on plot 1 on the amenity of the neighbouring dwellings has been considered. Although there will be a change in outlook resulting from the proposed development, the impact is not considered to be unacceptably detrimental to the amenity of the occupiers of the dwellings adjacent.
- The proposal is to develop a significantly smaller site than was proposed under the original outline planning application, which was considered at appeal, with a subsequent reduction in the number of units i.e. 190 as opposed to 315 as originally proposed. The reserved matters scheme put forward for consideration would utilise bus stop facilities on Old Norwich Road, whereas a larger scheme may have justified some degree of bus penetration within the site.

PART FOUR – CONCLUSION

13. Planning Balance and Conclusion

- 13.1 Notwithstanding the tension with the adopted Local Plan allocation, the grant of outline planning permission, via appeal, against the Council's refusal of application 1832/17 established the acceptability in principle of 190no. dwellings being erected on the identified site. On this basis of the above the principle and nature of the development is fixed; Members are not required to re-consider the permission from scratch and officers are satisfied that the development will continue to deliver the anticipated benefits and within the envelope of impacts already considered.
- 13.2 As a planning judgement, given the fact that the outline planning permission established the acceptability of the development taking place on the identified site, it now falls for the details of the proposed development to be considered under this reserved matters submission.
- 13.3 The proposal as presented to Committee is not the first iteration of the plans; ongoing liaison has taken place with the applicant's agent to address issues of townscape improvement, as well as other issues arising from consultee responses. The aim has been to ensure that a volume residential development can be provided on the site that is respectful of the constraints that exist and the challenges (and opportunities) that are presented by the site's topography. In both cases it is considered that the scheme presented to Members achieves an appropriate standard. The layout of the proposal is considered to be of merit in townscape terms, creating a legible development with properly defined public and private areas. In addition, the form of buildings reflects a traditional approach which is considered to be an appropriate design response in the context of the surroundings. The use of design and landscape in order to create differing character areas would mean that the development had its own visual identity.
- 13.4 In consideration of the proposals, the objections and concerns expressed by the Parish Council, and local residents, are fully acknowledged and appreciated. The development of the land will clearly be a fundamental alteration, and the agreed means of access will generate additional traffic movements. That said, the principle is established through the Appeal approval and the submission is considered to follow the development parameters established at that time. The application for reserved matters approval put forward for consideration by Members is judged by your officers to be an appropriate scheme, that is worthy of a positive recommendation.

14. Report update

- 14.1 As noted in Part One of this report, following consideration of the proposal, Members resolved to defer determination in order that a range of issues could be considered further. These are listed below:
- Triple parking provision
 - Boundary treatment for buffer area
 - Design of Plot 1
 - Roundabout including cycle route
 - False chimneys
 - Heating
 - Pedestrian connectivity
 - SuDS details

Triple parking provision

- 14.2 The applicant has reconsidered the instances of triple parking across the site, and a revised parking plan has been received that shows all occurrences of triple parking being removed, apart from one plot. The reason for the retention of the arrangement on this single plot (plot 135) is that the available space is limited if the layout proposals are to be retained. Generally, as advised elsewhere, it is considered that the overall layout as proposed merits support in planning terms, and the retention of the single instance of a triple parking arrangement allows this layout arrangement to be retained. In addition, this plot is located within a private drive where the other plots have the required number of spaces without the need for triple parking. There are also a number of visitor spaces along the shared surface route into the private drive. The outcome of addressing Members' concerns in this regard is considered to be a positive response. In addition, it is the case that the provision of triple parking did not give rise to an objection from the Highway Authority.

Boundary treatment for buffer area

- 14.3 The boundary treatment for the buffer area has been discussed with the applicant and further details have been obtained. It has been confirmed that the area will be locked from public access. The land will be managed by the private management company and any access would be considered trespass. Two further plans to demonstrate the relationship of this area with existing dwellings are being prepared.
- 14.4 In addition, to secure the areas it is considered that the use of close-boarded fencing as opposed to walling would be acceptable in amenity terms, bearing in mind that the overall area would be located in a position where it would be screened (and indeed overlooked) by dwellings. In terms of the access to the area, this would be controlled by the management company, and Members are familiar with this type of arrangement being in place for the control and maintenance of open spaces within large residential developments such as this.

Design to Plot 1

- 14.5 In response to this point the applicant has confirmed that the proposed arrangement of development on this particular plot would be varied such that the position of the dwelling and its associated garage would be handed, so that the garage was the closer building to the shared boundary, and the dwelling would be moved further away. In addition, the roof pitch of the garage was originally set at 35 degrees, but is now set at 25 degrees, to further reduce the overall impact of this building. Members will note that the previously-proposed location of the dwelling on plot 1 did not cause concerns for officers in relation to amenity impact. Nevertheless, the amendments now proposed would further mitigate the overall impact that development on this plot would have. In this regard, it is understood that the applicant has liaised with the affected neighbour regarding the proposed revisions.

Roundabout including cycle route

- 14.6 As advised previously, the means of vehicular access to the site and the roundabout junction arrangement has been proposed by the applicant following pre-submission liaison with the Highway Authority. Following on from the Committee meeting, the applicant has provided further information regarding the access, including a technical note.
- 14.7 The note advises that, pre-submission, three access options were considered as follows:
- Changed priority junction arrangement – discounted as it would create a cul de sac north of Whitton, and compromise the bus route and the route for cyclists.

- Standard Major/Minor Priority junction arrangement – discounted as the presence of the bus gate (and subsequent low traffic flows) causes an imbalance of capacity which could lead to complacency of road users leaving the site, and is perceived to carry the greatest risk for cyclists travelling north and pedestrians crossing the junction.
- Mini Roundabout junction arrangement – chosen as the optimal junction arrangement due to providing a balanced priority across all arms of the junction (considered to be the safest option for all road users, including cyclists). This arrangement has been subject to a Stage 1 Road Safety Audit. The note also advises that there are opportunities for additional signage to the eastern and southern arms of the roundabout that would highlight the no through route for the bus gate to the north.

14.8 The NPPF makes clear that ‘...In assessing...specific applications for development, it should be ensured that...safe and suitable access to the site can be achieved for all users...Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety...’ In this regard it is clear that alternatives to the proposed junction have been considered prior to the submission of this reserved matters proposal, and the roundabout arrangement is considered to be the most appropriate arrangement. On this basis, officers consider that the proposed means of access merits support in planning terms.

False chimneys

14.9 The architectural approach that has been taken on the site takes a traditional form, which is considered to be an appropriate visual response to the context of the surroundings and Suffolk as a whole. Features such as chimneys are found on this type of building but based on comments made at the last meeting, the applicant has agreed to remove chimneys from the proposed development.

Heating

14.10 In relation to the issue of heating, the applicant has provided an Energy and Sustainability Statement explaining the approach taken on their developments. The document concludes that:

‘...the development will follow a fabric first approach to sustainable construction, and sets out a proposed construction specification which exceeds the minimum requirements of the current adopted version of Approved Document L1A 2013...As the dwellings will meet the relevant energy requirements within the Building Regulations, as supported by planning policy, no renewable energy systems will therefore be incorporated into the dwellings at construction stage, however it is established that roof-mounted systems in the form of solar photovoltaics constitute the most appropriate systems to be retrofitted at a later date.’

14.11 It is understood that a ‘fabric first’ approach to sustainable construction relates to the insulation standards, thermal bridging and air leakage within the new buildings. The Council’s adopted policies recognise the importance of achieving sustainability, reflecting the presumption in favour of sustainable development within the NPPF. The overall sustainable ‘credentials’ of the proposed development in terms of location etc. have been explored at the time of the appeal. In terms of the sustainability of the construction, the scheme’s compliance with current building regulations is confirmed by the applicant.

Pedestrian connectivity

- 14.12 The applicant has considered this issue further and information has been provided that shows permeability for pedestrians, and links to the existing PROW in the area. The technical note provided by the applicant also explains why additional points of pedestrian access are not achievable. Inter alia the note states:

'...Due to existing boundary constraints to the north, west and south, the only option for site permeability is to connect to Old Norwich Road to the east...either via the proposed site access near or via the existing public right of way to the south east of the site...'

- 14.13 On the issue of pedestrian connectivity with the wider area it is considered that the proposal is a reasonable response, bearing in mind the constraints of the site. Clearly the options to the west are curtailed by the trunk road, and PROW provision to the north runs along the line of Old Norwich Road, which may be accessed via the proposed site access. The links to the PROW on the southern boundary have been realised in the scheme. It is your officers' view that safe routes for pedestrians are also provided within the site, which is also an important consideration.

SuDS details

- 14.14 At the time the Inspector granted outline planning permission for the proposed development, a condition was imposed which required the submission of a surface water drainage scheme, concurrent with the submission of the (first) reserved matters application. The consideration of this information is currently with the LLFA. As part of the condition, there is a requirement that topographic plans be provided '...showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows...'
- 14.15 Members will also note that the LLFA has not raised an objection to this reserved matters application submission, but has identified that the final landscaping proposals for the proposed SuDS system should be agreed.
- 14.16 Following deferral, a drainage technical note has been provided. This advises that the best drainage option was to infiltrate water into the ground. Furthermore, an area at the southern edge of the site was identified as being most suitable, with a basin being provided to store rainfall runoff while it drains into the underlying ground. The report further advises that '...The impact on neighbouring properties has been carefully considered, for much of the site the introduction of a sewer network will ensure that overland runoff toward the adjacent dwellings will be no worse than for the existing situation. The infiltration basin has been designed in accordance with current best practice and Suffolk's drainage officer has been consulted throughout the process. It has been sized to accommodate a storm with a 1% chance of occurring each year, including an allowance for more extreme storm events over the next 100 years due to climate change. As an additional safety precaution the infiltration rate used in the design is half that encountered during site investigations to guard against inconsistent ground conditions and degradation over the lifespan of the development...'

Conclusion

- 14.17 In summary, following the Committee's deferral of the application the applicant has engaged with officers to address the points identified in this supplementary report. Changes to the proposals have resulted in the virtual eradication of triple parking, loss of chimneys, rearrangement of development on Plot 1 and clarification of pedestrian connectivity. Clarification has also been provided in relation to site access, drainage, and the landscape buffer area. Further information has been obtained in relation to the applicant's approach to sustainable construction – prompted by a query regarding heating proposals – stating compliance with building regulations in this regard. On this basis, the scheme as revised is continued to be supported by officers and approval of reserved matters is recommended to Committee.

RECOMMENDATION

That the reserved matters are APPROVED subject to the following conditions:-

- Reserved matters permission given in accordance with the terms of the outline planning permission relating to this site and the conditions attached thereto remain in force, except where discharged or superseded by the reserved matters approval.
- Approved Plans (Plans submitted and as subsequently amended that form this application)
- Approval of final details for boundary treatments and external hard surfaces
- Vehicle parking, cycle parking and bin collection points to be provided in accordance with the detailed plans provided and thereafter retained as such
- Submission of a Sustainability and Energy Strategy
- Details of a Biodiversity Enhancement Layout to be submitted
- Submission of a detailed landscaping scheme comprising of details for the landscaping proposals for the SuDS features

Plus any further conditions as may be deemed necessary by the Chief Planning Officer

And the following informative notes as summarised and those as may be deemed necessary:

- Proactive working statement
- SCC Highways and LLFA notes
- Support for sustainable development principles

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Application No: DC/20/03704

Location: Land west of Old Norwich Road
Whitton

Appendix 1: Call In Request	<i>N/a</i>	
Appendix 2: Details of Previous Decision	<i>APP/W3520/W/18/3200941</i>	
Appendix 3: Town/Parish Council/s	<i>Claydon and Whitton Parish Council Bramford Parish Council</i>	
Appendix 4: National Consultee Responses	<i>Anglia Water Services Highways England NHS Natural England</i>	
Appendix 5: County Council Responses	<i>Highway Authority Lead Local Flood Authority Archaeological Service Development Contributions Manager Travel Plan Officer Public Rights of Way Officer Fire and Rescue Service</i>	
Appendix 6: Internal Consultee Responses	<i>Contaminated Land Officer Environmental Health (Noise) Environmental Health (Sustainability) Place Services Ecology</i>	



Babergh and Mid Suffolk District Councils



	<i>Place Services Landscape Public Realm Officer</i>	
Appendix 7: Any other consultee responses	<i>N/a</i>	
Appendix 8: Application Site Location Plan	<i>Yes</i>	
Appendix 9: Application Plans and Docs	<i>Yes</i>	
Appendix 10: Further information	<i>Roads, Highways and Access Technical Note 1 February 2021 Energy and Sustainability Statement January 2021 Drainage Strategy Jan 2021</i>	

The attached appendices have been checked by the case officer as correct and agreed to be presented to the committee.



Consultee Comments for Planning Application DC/20/03704

Application Summary

Application Number: DC/20/03704

Address: Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ

Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Case Officer: Bradly Heffer

Consultee Details

Name: Mrs Charmaine Greenan

Address: Valley View, Church Lane, Claydon Ipswich, Suffolk IP6 0EG

Email: Not Available

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

Claydon and Whitton Parish Councillors have the following concerns:

- The first archaeological dig in this location recommended a further independent dig, but there appears to be a suggestion that the dig will be performed by the developer.
- Councillors remain concerned about the implications of a roundabout to access and exit the new estate. There is no need for a roundabout as traffic should not be turning left out of the estate - this route is only for buses, cyclists, pedestrians and emergency vehicles. Councillors are worried that a roundabout in this location will encourage new residents to turn left and use the restricted road to reach the A14 more quickly. Councillors ask that further thought is put into how to prevent vehicles using the restricted route through Claydon, for example by possibly using cameras that are followed up with fines for using the road.
- Councillors are concerned that insufficient thought has been applied to congestion issues for new residents to leave the estate for the A14, as this road is frequently very busy and will be a lot busier with all the building happening in this area.
- Councillors are concerned that Plot 1 continues to have a significant impact on existing residents, as it overlooks an annex that is currently inhabited by an elderly couple.
- Further clarification is required regarding raised bus stops on the estate, as this formed part of the appeal paperwork.

Consultee Comments for Planning Application DC/20/03704

Application Summary

Application Number: DC/20/03704

Address: Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ

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Case Officer: Bradly Heffer

Consultee Details

Name: Mrs Charmaine Greenan

Address: Valley View, Church Lane, Claydon Ipswich, Suffolk IP6 0EG

Email: claywhit@btinternet.com

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

Claydon and Whitton Parish Council wish to ensure that future and existing residents in the parish have the best possible standard of living and that potential future issues that can be planned out are addressed. To this end, the Parish Council has the following concerns regarding the application for approval of reserved matters:

Plot 1

The position of Plot 1 is too close and will be overbearing for existing residents on Old Norwich Road. There is currently a bungalow next to Plot 1 on Old Norwich Road, which is set very low on the land, and Plot 1 is a two storey building that will sit much higher than the current property. Could this be replaced with a bungalow?

Access Roundabout

Parish Councillors feel that a roundabout is unnecessary in this situation and there are examples of larger planned developments (such as Church Lane, Barham) that have not had a roundabout recommended. Beyond the estate are only six properties on a no through road plus two buses per hour, so a roundabout is unnecessary as there will not be the through traffic to justify it.

The concerns regarding the roundabout are that it will create extra noise and air pollution with drivers having to slow down and accelerate. There are also road safety concerns. Old Norwich Road is a popular national cycle route, used by a variety of commuter and pleasure cyclists, including many young people on their way to school in Claydon (in future there are likely to be many more young people accessing schooling in Claydon or Ipswich from this estate). This unnecessary roundabout will add an extra danger to cyclists.

There are also concerns that if a roundabout is used for entrance onto the estate, it will encourage drivers to potentially turn left and illegally use the bus and cycle route as a cut through to Claydon and the A14. The Parish Council, together with the Police and Crime Commissioner Tim Passmore, are very concerned that this illegal use may increase and further endanger all the cyclists and pedestrians who use this route and make for difficulties at the junction at the bottom on Old Ipswich Road in Claydon, with unsafe turns onto Ipswich Road. In addition, if the road is used more with impunity, there may be an increase in drivers cutting through Claydon from the A14 and up Old Ipswich / Old Norwich Road to reach Ipswich without using the junction at Whitehouse. The Parish Council would welcome a road design that would direct traffic onto a bend into the new estate, and make it more difficult to continue straight on. In addition, on exiting the estate, it would be helpful if traffic could be directed to turn right, without the option of a left turn, to reduce the risk of illegal usage of Old Norwich / Old Ipswich Road.

Noise Pollution

The Parish Council remains concerned about the noise pollution from the A14 that will adversely affect potential future residents of the estate. It is thought that the particular landscape in this location allows for excessive road noise onto the planned development and the Parish Council would like to see further measures by the developer to improve the lives of future residents.

Parking Allocations on the estate

Parish Councillors note that there are a proportion of parking spaces allocated into garages. Realistically, residents do not use garages to park their cars in and this leads to significantly less than two parking spaces per property. It is felt that residents will use the allocated visitors parking bays for extra cars / work vans etc and there will be many cars parked on the roads of the estate that will create dangerous areas for pedestrians, drivers and playing / cycling children. The Parish Council requests that the parking on the estate is reviewed and allows for an actual two car parking spaces per house plus visitor parking.

Access for larger vehicles

Parish Councillors were concerned on viewing the plans about how larger vehicles such as dustbin lorries and emergency service vehicles would be able to manoeuvre around the estate, particularly the lack of room provided for turning, especially when considering the reality of on street parking that is likely given the scarcity of allocated parking in the plans. These manoeuvres will be dangerous for pedestrians, cyclists and other road users.

Buses

The Planning appeal paperwork detailed bus stops to be included on the estate, which would encourage the use of public transport so close to Ipswich. However, Parish Councillors could not find these bus stops detailed on the plans.

Buffer Zone

The Parish Council would like further clarity on the layout, fencing and maintenance of the buffer zone. Concerns about anti-social behaviour were expressed about this area from the police and plans were changed to reflect these, but Parish Councillors would like to understand how access to this area is to be prevented for anti-social behaviour and prevention of fly tipping, which would create an unsightly and unpleasant environment for future and existing residents. They would also like to understand how maintenance of this area is to be achieved in future.

Surface Water

These plans raise the question of how surface water is to be dealt with and Parish Councillors would like to understand this better before approving of these plans.

From: BRAMFORD PARISH COUNCIL <bramfordparishcouncil@btinternet.com>
Sent: 08 December 2020 13:57
To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: Re: Planning application consultation request - DC/20/03704

Dear James,

We have no comments to make regarding the planning application consultation request - DC/20/03704.

Many thanks.

Kind Regards,


Bramford Parish Council.

From: BRAMFORD PARISH COUNCIL <bramfordparishcouncil@btinternet.com>

Sent: 22 September 2020 23:01

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: Re: DC/20/03704 - Land west of Old Norwich Road Whitton Ipswich (EH Air, sustainability and other issues)

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Hello,

No, we do not need to comment on this matter. Thank you.

Regards,
Bramford Parish Council.

From: Planning Liaison <planningliaison@anglianwater.co.uk>
Sent: 05 September 2020 15:15
To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ - DC/20/03704

i **EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Dear Bradly Heffer,

Our Reference: PLN-0102797

Please see below our response for the planning application- Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ - DC/20/03704

Surface Water

We have reviewed the applicant's submitted surface water drainage information (190680-con-x-00-dr-c-1000-p9-drainage strategy - site wide) and have found that the proposed method of surface water discharge does not relate to an Anglian Water owned asset. As such, it is outside of our jurisdiction and we are unable to provide comments on the suitability of the surface water discharge. 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. A connection to the public surface water sewer may only be permitted once the requirements of the surface water hierarchy as detailed in Building Regulations Part H have been satisfied. This will include evidence of the percolation test logs and investigations in to discharging the flows to a watercourse proven to be unfeasible.

Please do not hesitate to contact the Pre-Development Team on the number below or via email should you have any questions related to our planning application response.

Kind regards,
Rory



Planning Liaison Team
Development Services
Telephone: 03456066087 Option 1

Anglian Water Services Limited
Thorpe Wood House, Thorpe Wood, Peterborough,
Cambridgeshire, PE3 6WT

From: Planning EE <PlanningEE@highwaysengland.co.uk>
Sent: 08 December 2020 12:04
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: Spatial Planning <SpatialPlanning@highwaysengland.co.uk>; Norman, Mark <Mark.Norman@highwaysengland.co.uk>; Willison, Simon p <simon.willison@aecom.com>
Subject: DC-20-03704 Consultation Response

Dear Sir/Madam

Thank you for your consultation on the above planning application.

We have reviewed the details and information provided. Due to the nature of the Reserved Matters relating to this application for the proposed development, there is unlikely to be any adverse effect upon the Strategic Road Network.

Consequently our previous recommendation of **No Objection** remains unchanged.

Kind Regards

JARROD GOY

Spatial Planning

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

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

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

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Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

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

To: Mid Suffolk District Council
growthandplanning@highwaysengland.co.uk

Council's Reference: DC/20/03704

Referring to the planning application referenced above, dated 2 December 2019, application for the submission of details under Outline Planning Permission DC/17/04113 - Appearance, Landscaping, Layout and Scale for the erection of 98 dwellings (including 34 affordable homes), provision of a junior football pitch, areas of public open space and off site highway improvements, Land East Of King George's Field, Green Road, Haughley, IP14 3RA, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

Signature:	Date: 7 December 2020
Name: Mark Norman	Position: Spatial Planning Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
mark.norman@highwaysengland.co.uk	


Annex A Highways England recommended no objection

HIGHWAYS ENGLAND has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regards to DC/20/03704 and has been prepared by Simon Willison.

Given the scale and location of this development it is unlikely to result in a severe impact upon the strategic road network.

From: Planning EE <PlanningEE@highwaysengland.co.uk>
Sent: 03 September 2020 16:02
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: growthandplanning <growthandplanning@highwaysengland.co.uk>; 'Willison, Simon p' <simon.willison@aecom.com>
Subject: DC/20/03704 Consultation Response

 **EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Dear Sir/Madam

Thank you for your consultation on the above planning application.

We have reviewed the details and information provided. The amendments proposed to this planning application are unlikely to have an adverse effect upon the Strategic Road Network.

Consequently our previous recommendation of **No Objection** remains unchanged.

Kind Regards

JARROD GOY

Spatial Planning

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

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

From: planning.apps <planning.apps@suffolk.nhs.uk>

Sent: 08 December 2020 09:56

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: DC/20/03704

Please be aware that the CCG has responded to a previous version of this planning application and that response is still pertinent.

Regards

CCG Estates Planning Support

Ipswich & East Suffolk CCG & West Suffolk CCG
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

planning.apps@suffolk.nhs.uk

www.westsuffolkccg.nhs.uk

www.ipswichandeastsuffolkccg.nhs.uk





**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Email address: planning.apps@suffolk.nhs.uk
Telephone Number – 01473 770000

Your Ref: DC/20/03704

Our Ref: IESCCG/000920/IPS

Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk, IP1 2BX

23/09/2020

Dear Sirs, Madam

Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Location: Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of Ipswich & East Suffolk Clinical Commissioning Group (CCG).

Background

2. The proposal comprises a development of up to 190 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. The CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There are 2 GP practices within a 2km radius of the proposed development. These practices do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Needs Arising From the Proposed Development

4. At the earliest stage in the planning process it is recommended that work is undertaken with Ipswich and East Suffolk CCG and Public Health England to understand the current and future dental needs of the development and surrounding areas giving consideration to the current dental provision, current oral health status of the area and predicted population growth to ensure that there is sufficient and appropriate dental services that are accessible to meet the needs of the development but also address existing gaps and inequalities.

Encourage oral health preventative advice at every opportunity when planning a development, ensuring that oral health is everybody's business, integrating this into the community and including this in the health hubs to encourage and enable residents to invest in their own oral healthcare at every stage of their life.

Health & Wellbeing Statement

As an Integrated Care System it is our ambition that every one of the one million people living in Suffolk and North East Essex is able to live as healthy a life as possible and has access to the help and treatment that they need in the right place, with good outcomes and experience of the care they receive.

Suffolk and North East Essex Integrated Care System, recognises and supports the role of planning to create healthy, inclusive communities and reduce health inequalities whilst supporting local strategies to improve health, social and cultural wellbeing for all aligned to the guidance in the NPPF section 91. The way health and care is being delivered is evolving, partly due to advances in digital technology and workforce challenges. Infrastructure changes and funds received as a result of this development may incorporate not only extensions, refurbishments, reconfigurations or new buildings but will also look to address workforce issues, allow for future digital innovations and support initiatives that prevent poor health or improve health and wellbeing.

The NHS Long term plan requires a move to increase investment in the wider health and care system and support reducing health inequalities in the population. This includes investment in primary medical, community health services, the voluntary and community sector and services provided by local authorities so to boost out of hospital care and dissolve the historic divide between primary and community health services. As such, a move to health hubs incorporating health and wellbeing teams delivering a number of primary and secondary care services including mental health professionals, are being developed. The Acute hospitals will be focussing on providing specialist treatments and will need to expand these services to cope with additional growth. Any services which do not need to be delivered in an acute setting will look to be delivered in the community, closer to people's homes.

The health impact assessment (HIA) submitted with the planning application will be used to assess the application. This HIA will be cross-referenced with local health evidence/needs assessments and commissioners/providers own strategies so to ensure that the proposal impacts positively on health and wellbeing whilst any unintended consequences arising are suitably mitigated against.

The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

Table 1: Summary of capacity position for healthcare services closest to the proposed development.

Premises	Weighted List Size ¹	NIA (m²)²	Capacity³	Spare Capacity (NIA m²)⁴
The Chesterfield Drive Practice	11,118	375.50	5,476	-387
Deben Road Surgery	6,920	259.00	3,777	-216
Total	18,038	634.50	9,253	-603

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. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO) Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
4. Based on existing weighted list size.

5. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at The Chesterfield Drive Practice and Deben Road Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
6. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising

7. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
8. Assuming the above is considered in conjunction with the current application process, Ipswich and East Suffolk CCG would not wish to raise an objection to the proposed development.
9. Ipswich and East Suffolk CCG is satisfied that the basis of a request for CIL contributions is consistent with the Position Statement produced by Babergh and Mid Suffolk District Councils

Ipswich and East Suffolk 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

Chris Crisell

Estates Project Manager

Ipswich and East Suffolk Clinical Commissioning Group

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 09 December 2020 11:19
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: Planning Consultation DC/20/03704 - Additional NE Response
Importance: High

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F.A.O. Mr Bradly Heffer

Dear Mr Heffer

Our ref: 334598
Your ref: DC/20/03704

Further to our previous response which was sent this morning (see attachment above) we include further advice.


Our Norfolk and Suffolk Area team noted from the information provided within the Ecological Impact Assessment, Appendix 11. Mitigation masterplan, that the locations of badger setts are visible to everyone. They think this is an oversight as badger sett locations are usually redacted for the badgers safety.

If you have any queries please contact us at consultations@naturalengland.org.uk.

Yours sincerely

Clare Foster
Natural England
Consultation Service
Operations Delivery
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 09 December 2020 08:23
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: Planning Consultation DC/20/03704 - NE Response
Importance: High

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F.A.O. Mr Bradly Heffer

Dear Mr Heffer,

Our ref: 334598
Your ref: DC/20/03704

Thank you for your amended consultation including the 'Information to support habitats regulations assessment'.

Natural England has previously commented on this proposal, our ref: 326834, and made comments to the authority in our letter dated 23 September 2020. I enclose a copy of the letter for your reference.

The advice provided in our previous response applies equally to this amendment. We have reviewed the documents and we are content that there will be no adverse effect on integrity if the mitigation listed within the document 'Information to support habitats regulations assessment' is secured.

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

Yours sincerely

Clare Foster
Natural England
Consultation Service
Operations Delivery
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Date: 23 September 2020
Our ref: 326834
Your ref: DC/20/03704



planningblue@babberghmidsuffolk.gov.uk
FAO Bradly Heffer

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

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Heffer

**Planning consultation: Approval of reserved matters of outline application 1832/17 for up to 190 dwellings with public open space, vehicular access and associated infrastructure
Location: Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ**

Thank you for your consultation on the above dated 02 September 2020 which was received by Natural England on the same day.

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would:

- have an adverse effect on the integrity of the following designated sites:
 - Deben Estuary Special Protection Area and Ramsar
 - Stour and Orwell Estuaries Special Protection Area and Ramsar
- damage or destroy the interest features for which the following Sites of Special Scientific Interest have been notified:
 - .Deben Estuary
 - Orwell Estuary
 - Stour Estuary
- Further information on the designated sites is available from <https://designatedsites.naturalengland.org.uk/>.

The Report to Inform a Habitats Regulation Assessment; file reference 1005463 HRA vf1 CL/DM, dated 29 October 2018 states that mitigation was agreed between the applicant and the local authority in line with Natural England's advice. It is therefore our view that the proposal is unlikely to lead to adverse effects on the integrity of the internationally important designated sites listed above. Natural England also consider that the proposal is also unlikely to adversely affect the Sites of Special Scientific Interest mentioned above.

We therefore have no objections, subject to the agreed mitigation options identified in the Shadow Habitats Regulation Assessment (HRA) report being secured through an appropriate planning condition or obligation attached to any planning permission.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

We provided further general advice on the consideration of protected species and other natural environment issues in our response to Mr Colin Lee of Aspect Ecology dated 18 December 2018 (planning application ref: 1832/17; our ref: 267303) which we hope has been helpful.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our [Discretionary Advice Service](#).

If you have any queries relating to the advice in this letter please contact me on 020 802 64908.

Should the proposal change, please consult us again.

Yours sincerely

Patrick Robinson
Norfolk and Suffolk Area Team

All planning enquiries should be sent to the Local Planning Authority.

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Bradly Heffer

Dear Bradly,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/03704

PROPOSAL: Amended drawings and further information received by LPA 16/11/2020, ref:

Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

LOCATION: Land West Of Old Norwich Road Whitton Suffolk IP1 6LQ

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

COMMENTS

Parking for 4-bedroomed dwellings with tandem parking in front of a garage is only on dwellings on private drives so the site is in accordance with Suffolk Guidance for Parking on a private drive.

CONDITIONS

Should the Planning Authority be minded to grant planning approval the Highway Authority in Suffolk would recommend they include the following conditions and obligations:

Highway Improvement Condition; detailed design of the mitigation measures on Old Norwich Road are to be submitted and approved by the highway authority. The approved scheme shall be laid out, constructed and made functionally available for use prior to increase in production and thereafter retained in the approved form for the lifetime of the development.

Reason: To ensure that suitable highway improvements and mitigation measures are provided.

Parking Condition: The use shall not commence until the area(s) within the site shown on Drawing No. 8859 / 21A for the purposes of manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

Cycle Condition: The areas to be provided for cycle parking as shown on Drawing No. 8859 / 21A shall be provided in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that the provision for cycle parking is provided in line with sustainable transport policies.

EVC Condition: Before the development is commenced, details of electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be in accordance with Suffolk Parking Guidance 2019 and carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To promote the use of sustainable travelling alternatives within the area and use of electric vehicles.

Bin Condition: The areas to be provided for presentation and storage of Refuse/Recycling bins as shown on Drawing No.8859 / 22A shall be provided 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.

Construction Management Plan 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 photographic survey to be carried out to determine the condition of the carriageway and footways prior to commencement of the works
- Means of access for construction traffic
- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials
- maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: 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.

NOTES

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

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. These works will need to be applied for and agreed with Suffolk County Council as the Local Highway Authority. Application form for minor works licence under Section 278 of the Highways Act 1980 can be found at the following webpage: www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

All planning enquiries should be sent to the Local Planning Authority.

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Bradly Heffer

Dear Bradly

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/03704

PROPOSAL: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

LOCATION: Land West Of Old Norwich Road Whitton Suffolk IP1 6LQ

ROAD CLASS:

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

Construction of Roads and Footways

- Dimensions of the proposed roads and footways are to Suffolk Design Guide. The details are to be to Suffolk County Estate Road Specification.
- All footway links within the site are to have bound surfacing to enable use throughout the year. Full details finishes and construction will be agreed under s38 of Highways Act 1980 if the developer wishes the roads and footways to be adopted by SCC as the Highway Authority.

Parking

- Where a 4-bedroomed dwellings with tandem parking in front of a garage; is not acceptable unless on a private drive. Plots 3, 32, 42, 11, 41, 182 and 43 are showing 'triple' parking on Minor or shared roads.
- The 4-bedroomed dwellings on Plots 97,168,109 and 175 are only providing 2 parking places on plot when 3 are required for this size dwelling.

Landscaping

- Landscaping has not been provided with the reserved matters. We recommend planting of soft landscaping is not proposed within visibility splays for junctions and on bends; we suggest that these locations are grassed areas as the hedges may not be maintained in the future and be kept lower than 600mm high.
- Any hedges proposed adjacent to the back of footways are to be planted with sufficient room to allow growth, so they do not overhang the footway.

- Trees to have 2.5m minimum offset from the edge of the adoptable highway and should have root protection and not interfere with street lighting.

We can recommend conditions once the above points have been addressed. We look forward to receiving further information.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

All planning enquiries should be sent to the Local Planning Authority.

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Bradly Heffer

Dear Bradly

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/03704

PROPOSAL: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

LOCATION: Land West Of Old Norwich Road Whitton Suffolk IP1 6LQ

ROAD CLASS:

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

Construction of Roads and Footways

Dimensions of the proposed roads and footways are to Suffolk Design Guide. The details are to be to Suffolk County Estate Road Specification.

All footway links within the site are to have bound surfacing to enable use throughout the year.

Full details finishes and construction will be agreed under s38 of Highways Act 1980 if the developer wishes the roads and footways to be adopted by SCC as the Highway Authority.

Parking

Where a 4-bedroomed dwellings with tandem parking in front of a garage; is not acceptable unless on a private drive. Plots 3, 32, 42, 11, 41, 182 and 43 are showing 'triple' parking on Minor or shared roads. The 4-bedroomed dwellings on Plots 97,168,109 and 175 are only providing 2 parking places on plot when 3 are required for this size dwelling.

Landscaping

Landscaping has not been provided with the reserved matters. We recommend planting of soft landscaping is not proposed within visibility splays for junctions and on bends; we suggest that these locations are grassed areas as the hedges may not be maintained in the future and be kept lower than 600mm high. Also, any hedges proposed adjacent to the back of footways are to be planted with sufficient room to allow growth, so they do not overhang the footway.

Trees to have 2.5m minimum offset from the edge of the adoptable highway and should have root protection and not interfere with street lighting.

We can recommend conditions once the above points have been addressed. We look forward to receiving further information.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

From: GHI Floods Planning <floods.planning@suffolk.gov.uk>

Sent: 27 November 2020 11:45

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>

Subject: 2020-11-27 JS reply Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ Ref DC/20/03704 RMA

Dear Bradley Heffer,

Subject: Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ Ref DC/20/03704 Reserved Matter Applications

Suffolk County Council, Flood and Water Management have reviewed application ref DC/20/03704.

We have reviewed the following submitted documents and we recommend **approval subject to conditions** at this time;

- Site Location Plan Ref 8859/01
- Construction Management Plan (No reference)
- Sustainable Drainage Maintenance Plan Ref 190680/J Courtney V1
- Drainage Strategy Report Ref 190680/J Courtney V1.4
- Reserved Matters Drainage Strategy Part 1 to 4 Ref 190680
- Drainage Strategy, Sheet 1 & 2 Ref 190680-con-x-00-dr-c-1001-P10
- Drainage Strategy, Site Wide 190680-con-x-00-dr-c-1000-P10
- Letter from Conisbee Consulting Ref J Courtney/190680 Dated 12th Nov 2020
- 190680 CDM Risk Assessment
- Landscape Masterplan Drawing Ref PR175-01 Rev N

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

No development shall commence until details of the proposed landscaping for the SuDS features have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be carried out to the satisfaction of the Local Planning Authority in accordance with a previously agreed timescale. In addition, landscaping features which, within a period of 5 years of being planted die, are removed or seriously damaged or seriously diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority agrees, in writing, to a variation of the previously approved details.

Reason: In order to ensure that the landscaping provided as part of the approved SuDS features is of an appropriate type and standard to maintain water quality and in the interests of securing a satisfactory form of development.

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 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act 1991
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council
Growth, Highway & Infrastructure

Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

****Note I am remote working for the time being****

From: GHI Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 14 September 2020 10:08
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>; Grace Waspe <Grace.Waspe@baberghmidsuffolk.gov.uk>
Subject: 2020-09-14 JS reply Land Between A14 And Old Norwich Road, Old Norwich Road, Whitton IP1 6LQ Ref DC/20/03703 DoC

Dear Bradly Heffer,

Subject: Land Between A14 And Old Norwich Road, Old Norwich Road, Whitton, Suffolk IP1 6LQ - Condition 9 (Construction Surface Water Management Plan), Condition 18 (Surface Water Drainage Scheme), Condition 19 (Implementation, Maintenance and Management) and Condition 24 (Flood Risk Asset Register)

***Note, This should be read in conjunction with the reserved matters application Ref DC/20/03704.**
**** Note, The LLFA will only be reviewing the surface water element of the report**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/20/03703.

We have reviewed the following submitted documents and we recommend **refusal** to discharge condition 9, 19, & 24

- Construction Management Plan (No reference)
- Sustainable Drainage Maintenance Plan Ref 190680/J Courtney V1
- Drainage Strategy Report Ref 190680/J Courtney V1.4
- Reserved Matters Drainage Strategy Part 1 to 4 Ref 190680
- Drainage Strategy, Sheet 1 & 2 Ref 190680-con-x-00-dr-c-1001-p9
- Drainage Strategy, Site Wide 190680-con-x-00-dr-c-1000-p9

9) 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 has been 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.

18) Concurrent with the first reserved matters application 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 Flood Risk Assessment (FRA) by Hydrock, dated September 2017, 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) when discharging into the chalk, the infiltration basin shall be no greater than 1m depth and shall be highly vegetated to protect ground water.
- The scheme shall be fully implemented as approved.

19) Concurrent with the first reserved matters application details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

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

The points below detail the action required in order to overcome our current refusal:-

1. Condition 9
 - a. Reference number is to be added to front page
 - b. Reference that the site is within a Source Protection Zone III and Drinking Water Protected Areas (Surface Water) (England)
 - c. SuDS remediation plan or statement is to be added
2. Condition 18
 - a. Submit a cross section of the proposed swales
 - b. Submit new infiltration test results to BRE 365 Digest, as extrapolated results are not accept or provide alternative surface water drainage strategy
 - c. Erosions protection measures required at inlet to the infiltration basin
 - d. Demonstrate the capture and retention of the first 5mm of any rainfall event
 - e. Show maintenance strips/easement around the SuDs features
 - f. Submit a CDM Designers risk assessment for the open SuDS features
 - g. Submit detail of how the swales and the gas main will both be protected during maintenance activities
 - h. Submit a landscaping plan for the all the SuDs features
3. Condition 19, can only be discharged once the reserved matters and condition 8 have been approved
4. Condition 24, a completed flood risk asset register template is to be submitted once the surface water drainage system has been installed (***note the submitted excel cannot be opened**)
 - a. <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council
Growth, Highway & Infrastructure
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

****Note I am remote working for the time being****

-----Original Message-----

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 01 September 2020 17:19

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

Subject: MSDC Planning Consultation Request - DC/20/03703

Please find attached planning consultation request letter relating to planning application - DC/20/03703 - Land Between A14 And Old Norwich Road, Old Norwich Road, Whitton, Suffolk IP1 6LQ

Kind Regards

Planning Support Team

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

Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

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

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich IP1 2BX

Enquiries to: Abby Antrobus
Direct Line: 01284 741231
Email: abby.antrobus@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2020_003704
Date: 24th September 2020

For the Attention of Bradly Heffer

Dear Mr Isbell

Planning Application DC/20/03704– Land west of Old Norwich Road, Whitton, Ipswich, Suffolk: Archaeology

As was identified for the outline application for this site, 1832/17, the location overlooking a tributary of the River Gipping location is topographically favourable for early activity. There was known cropmark evidence relating to likely enclosed prehistoric and undated settlement, and geophysical survey and trial-trenched archaeological evaluation was therefore carried out to inform LPA decisions (APS Report No 49/18, November 2018).

The combination of crop mark, geophysical and trial trench evidence shows that within this Reserved Matters application area, there are three main concentrations of prehistoric archaeological remains. These comprise enclosed settlement, enclosures, pits and ditches which date from the Late Neolithic/Early Bronze Age to the Late Iron Age (c. 2,350 BC to AD 42). The associated artefactual and environmental remains relate to aspects of life such as craft, industry and economy. There is potential for evidence from the site to contribute to public understanding of what ancient people were doing in this landscape, and how their activities changed across the area. Defined sites, with their unique and irreplaceable archaeological evidence, will therefore be damaged or destroyed by the physical impacts of development. There are also hints of activity of other periods.

Condition number 28 on the outline consent was worded and placed on the decision by the Inspector at appeal and is written in full below:

'The developer shall keep a written record of any archaeological heritage assets encountered during the excavation and construction phases of development in a manner proportionate to their importance and impact, and keep a public record of this information.'

From the evaluation data, it can be established that the remains are important as the only evidence for understanding the local area in the prehistoric period, and also that, as relatively defined sites across a landscape, they have wider importance with potential to advance specific research themes in the [Regional Research Framework](#). These relate, for example, to prehistoric landscape development and change, transitions between periods, patterns of settlement and agricultural development.

Mitigation in a 'manner proportionate to their importance and impact' will of necessity involve controlled excavation that is designed to meet research questions, with professional and experienced expertise commissioned to recognise and record remains. Without this, the condition could not be discharged.

However, the condition does not follow the wording advised by SCC Archaeological Service and does not reflect model conditions advocated by the heritage sector that are intended to give Local Planning Authorities robust provision to approve a programme of work and have reassurance that the interests of unique archaeological assets will be effectively safeguarded prior to impacts of development.

Securing of a programme of work that can be planned and delivered in advance would also be in the interests of the developer, to avoid significant delays to construction programmes.

SCCAS therefore recommend strongly that conditions are placed on the Reserved Matters consent to provide an effective mechanism for securing further detail on the programme and timing of work, and confirmation of proposals for how it will be assessed, archived and published into the public domain. This recommendation is in line with paragraph 199 of the NPPF.

The following two conditions 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 part 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 Policy CS10 of Babergh District Council Core Strategy (2011- 2031) Submission Draft and the National Planning Policy Framework (2019).

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.

I would be happy to discuss any bespoke tailoring of condition wording.

SCC Archaeological Service would also be pleased to offer guidance on the archaeological work required and, in our role as advisors to Babergh and Mid Suffolk District Councils, we will on request provide a specification. In this case, archaeological excavation will be required where remains were identified in the evaluation which will be negatively impacted by the development.

Further details on our advisory services and charges can be found on our website: <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,

Dr Abby Antrobus

Senior Archaeological Officer

Your ref: DC/20/03704
Our ref: Whitton – land west of Old Norwich
Road 51089
Date: 20 November 2020
Enquiries: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Bradly Heffer,
Growth & Sustainable Planning,
Babergh and Mid Suffolk District Councils,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Bradly,

Whitton: land west of Old Norwich Road – reserved matters

I refer to the proposal: application for approval of reserved matters including access, layout, scale, appearance and landscaping following outline planning application 1832/17 allowed at appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Reason(s) for re-consultation: amended drawings and further information received by the local planning authority on the 16 November 2020.

I previously submitted a consultation response by way of letter dated 04 September 2020. I have no further comments to make but have copied to colleagues.

Yours sincerely,

Neil McManus BSc (Hons) MRICS
Development Contributions Manager
Growth, Highways & Infrastructure

cc Sam Harvey, SCC (highways)
Floods Planning, SCC (LLFA)
Suffolk Archaeological Service

Your ref: DC/20/03704
Our ref: Whitton – land west of Old Norwich
Road 51089
Date: 04 September 2020
Enquiries: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Bradly Heffer,
Growth & Sustainable Planning,
Babergh and Mid Suffolk District Councils,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Bradly,

Whitton: land west of Old Norwich Road – reserved matters

I refer to the proposal: application for approval of reserved matters including access, layout, scale, appearance and landscaping following outline planning application 1832/17 allowed at appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

The outline planning application under reference 1832/17 was partially allowed on appeal. The appeal decision is dated 04 March 2019 and in paragraph 5 the Inspector says, “*On the basis of the contents of the obligation and the compliance statements I am content that all matters conform to the CIL Regulations and that the obligation can be taken into account if planning permission is to be granted*”. There is an associated planning obligation dated 08 January 2019. The planning obligations previously secured under the first planning permission must remain in place if reserved matters approval is granted.

I have copied this letter to colleagues.

Yours sincerely,

Neil McManus BSc (Hons) MRICS
Development Contributions Manager
Growth, Highways & Infrastructure

cc Sam Harvey, SCC (highways)
Floods Planning, SCC (LLFA)
Suffolk Archaeological Service

From: Chris Ward <Chris.Ward@suffolk.gov.uk>
Sent: 20 November 2020 08:33
To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Re-consultation Request - DC/20/03704

Dear Bradly,

Thank you for notifying me about the re-consultation. I can confirm that I have no further comments to add from my response that I made on the 4th September 2020.

Kind regards

Chris Ward
Travel Plan Officer
Transport Strategy
Strategic Development - Growth, Highways and Infrastructure
Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

From: Chris Ward <Chris.Ward@suffolk.gov.uk>
Sent: 04 September 2020 16:10
To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/20/03704

Dear Bradly,

Thank you for consulting me about the reserved matters planning application for the residential development at Land West of Old Norwich Road in Whitton. Having reviewed the application documents, I have no comments to make for this specific application.

Kind regards

Chris Ward

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

From: GHI PROW Planning <PROWplanning@suffolk.gov.uk>
Sent: 08 September 2020 11:58
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: David Falk <david.falk@suffolk.gov.uk>; Debbie Adams <Debbie.Adams@suffolk.gov.uk>
Subject: FW: MSDC Planning Consultation Request - DC/20/03704

PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE

REF: Land west of Old Norwich Road, Whitton, IP1 6LQ – DC/20/03704

Thank you for your consultation concerning the above application.

The proposed site does contain public rights of way (PROW) – Footpath 1 and Footpath 15 Whitton. The Definitive Map for Whitton can be seen at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Whitton.pdf>. A more detailed plot of public rights of way can be provided. Please contact DefinitiveMaps@suffolk.gov.uk for more information. Note, there is a fee for this service.

We accept this proposal on the basis that the Applicant appears to have accommodated FP1 and FP15 in its plans along the southern border of the site, however the Applicant MUST also take the following into account, particularly in relation to carrying out work and/or disturbing the surface of a PROW:

1. PROW are divided into the following classifications:
 - Public Footpath – only for use on foot or with a mobility vehicle
 - Public Bridleway – use as per a public footpath, and on horseback or by bicycle
 - Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, e.g. a horse and carriage
 - Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

All currently recorded PROW are shown on the Definitive Map and described in the Definitive Statement (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact DefinitiveMaps@suffolk.gov.uk.

2. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.
3. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It **DOES NOT** give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to

close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:

- To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. **PLEASE NOTE** that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
 - To discuss applying for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
 - To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> **PLEASE NOTE** that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
4. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
5. Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

In the experience of the County Council, early contact with the relevant PROW officer avoids problems later on, when they may be more time consuming and expensive for the applicant to address. More information about Public Rights of Way can be found at www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/

Thank you for taking the time to consider this response.

Public Rights of Way Team

Growth, Highways and Infrastructure
Suffolk County Council
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP
PROWplanning@suffolk.gov.uk

-----Original Message-----

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 02 September 2020 17:20

To: GHI PROW Planning <PROWplanning@suffolk.gov.uk>

Subject: MSDC Planning Consultation Request - DC/20/03704

Please find attached planning consultation request letter relating to planning application - DC/20/03704 - Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

Kind Regards

Planning Support Team

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

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-----Original Message-----

From: Water Hydrants <Water.Hydrants@suffolk.gov.uk>

Sent: 20 November 2020 07:10

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Angela Kempen <Angela.Kempen@suffolk.gov.uk>; laura.dudley-smith@struttandparker.com

Subject: FW: MSDC Planning Re-consultation Request - DC/20/03704

Fire Ref.: F030123

Original Planning Application: 1832/17

Location: Land West of Old Norwich Road, Whitton, Ipswich, Suffolk, IP1 6LQ

Good Morning,

Thank you for your email informing us of the re-consultation for this site.

The Suffolk Fire & Rescue Service made comment on the original planning application 1832/17, which we note was published, and a Condition has been placed under the Schedule of Conditions for the installation of Fire Hydrants.

The Condition for the installation of Fire Hydrants, will need to Remain in Place for planning application DC/20/03704.

If you have any queries, please let us know.

Kind regards,

A Stordy

BSC

Admin to Water Officer

Engineering

Fire and Public Safety Directorate

Suffolk County Council

3rd Floor, Lime Block

Endeavour House

Russell Road

IP1 2BX

Tel.: 01473 260564

Team Mailbox: water.hydrants@suffolk.gov.uk

From: Water Hydrants <Water.Hydrants@suffolk.gov.uk>
Sent: 22 September 2020 14:23
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: Angela Kempen <Angela.Kempen@suffolk.gov.uk>
Subject: RE: DC/20/03704 - Land west of Old Norwich Road Whitton Ipswich (EH Air, sustainability and other issues)

Fire Ref.: F030123
Original Planning Application: 1832/17
Location: Land West of Old Norwich Road, Ipswich

Good Afternoon,
Thank you for your email.
The Suffolk Fire and Rescue note that our original comments made on planning application 1832/17 (which was Refused) has been published. Please ensure that there is a Condition for the installation of Fire Hydrants in the Reserved Matters for planning application DC/20/03704.
If you have any queries, please let us know.

Kind regards,
Andrea Stordy
BSC
Admin to Water Officer
Engineering
Fire and Public Safety Directorate
Suffolk County Council
3rd Floor, Lime Block
Endeavour House
Russell Road
IP1 2BX

Tel.: 01473 260564
Team Mailbox: water.hydrants@suffolk.gov.uk

From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 24 November 2020 08:12
To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>
Subject: DC/20/03704. Land Contamination and Air Quality

Dear Bradly

EP Reference : 283962/283964
DC/20/03704. Land Contamination and Air Quality
SH, Street Record, Old Norwich Road, Whitton, IPSWICH, Suffolk.
Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning etc

Many thanks for your request for comments in relation to the above submission. I can confirm that I have no comments to make with respect to land contamination as all such issues were dealt with at the outline permission stage

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk
Work: 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
Sent: 18 September 2020 10:15
To: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: DC/20/03704. Land Contamination

Dear Bradly

EP Reference : 281046
DC/20/03704. Land Contamination
SH, Street Record, Old Norwich Road, Whitton, IPSWICH, Suffolk.
Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed etc

Many thanks for your request for comments in relation to the above submission. I can confirm that I have no comments to make with respect to land contamination as all such issues were dealt with at the outline permission stage.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk
Work: 07769 566988 / 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk



From: Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>
Sent: 19 November 2020 16:08
To: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: DC/20/03704

Environmental Health -
Noise/Odour/Light/Smoke

APPLICATION FOR RESERVED MATTERS - DC/20/03704

Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Location: Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

Thank you for re consulting Environmental Protection on this application. I have no further comments to add to those already submitted by David Harrold on 5/10/20 which still remain valid.

Regards

Andy

Andy Rutson-Edwards, MCIEH AMIOA

Senior Environmental Protection Officer

Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724727

Email andy.rutson-edwards@baberghmidsuffolk.gov.uk

www.babergh.gov.uk www.midsuffolk.gov.uk

From: David Harrold <David.Harrold@babberghmidsuffolk.gov.uk>
Sent: 05 October 2020 10:50
To: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>
Cc: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Subject: Plan ref - DC/20/03704 Land West Of Old Norwich Road, Whitton. Environmental Health - Noise/Odour/Light/Smoke

Thank you for consulting me on the above application for approval of reserved matters and in particular access, appearance, landscaping, layout and scale.

I understand that noise issues are subject to a separate application

I can confirm that with respect to noise and other environmental health matters I do not have any comments to make.

.

David Harrold MCIEH
Senior Environmental Health Officer

Babergh & Midsuffolk District Councils
t: 01449 724718
e: david.harrold@babberghmidsuffolk.gov.uk

From: Simon Davison <Simon.Davison@babberghmidsuffolk.gov.uk>
Sent: 09 December 2020 08:49
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: DC/20/03704

Dear Philip,

APPLICATION FOR RESERVED MATTERS - DC/20/03704

Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Location: Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

Reason(s) for re-consultation: Amended drawings and further information received by the Local Planning Authority on the 16th November 2020.

Many thanks for your request to comment on the sustainability and Climate Change Impacts of this application.

The council declared a climate emergency in 2019 and has an aspiration to become Carbon neutral by 2030, it is encouraging all persons involved in developments and activities in the district to consider doing the same. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability.

My predecessor, Iain Farquharson, commented on the Planning Consultation Request - 1832/17 and requested that the following condition be placed on any grant of permission: Before any development is commenced a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation including (but not limited to) details on environmentally friendly materials, minimum Green Guide ratings, construction techniques, minimisation of carbon emissions beyond Part L, running costs and reduced use of potable water (suggested maximum of 105ltr per person per day). This document shall be submitted to, and approved in writing by, the Local Planning Authority.

The application for approval of reserved matters does not include a Sustainability and Energy Strategy and neither does the re-consultation therefore the original condition, requested by my predecessor, has not been met.

It is therefore requested that the following condition be placed on any grant of permission:

Before any development a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day). This document shall be submitted to, and approved in writing by, the Local Planning Authority.

It is noted that MHVR and WHVS are discounted as usable technologies at the outset of the project and are referred to as potential 'bolt-on' technologies that could potentially be used to

upgrade the property in the future. Neither of these technologies are appropriate for retrofitting and, if adopted, should always be included at the beginning of the project.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmental-management/planning-requirements/>

Kind regards

Simon Davison PIEMA
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils - Working Together

Mobile: 07874 634932

t: 01449 724728

email: simon.davison@baberghmidsuffolk.gov.uk

w: www.babergh.gov.uk www.midsuffolk.gov.uk

From: Simon Davison <Simon.Davison@baberghmidsuffolk.gov.uk>
Sent: 23 September 2020 17:19
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: DC/20/03704 Comment on Application for approval of reserved matters

Dear Philip,

APPLICATION FOR RESERVED MATTERS - DC/20/03704

Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Location: Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ.

The council declared a climate emergency in 2019 and has an aspiration to become Carbon neutral by 2030, it is encouraging all persons involved in developments and activities in the district to consider doing the same. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability.

My predecessor, Iain Farquharson, commented on the Planning Consultation Request - 1832/17 and requested that the following condition be placed on any grant of permission: Before any development is commenced a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation including (but not limited to) details on environmentally friendly materials, minimum Green Guide ratings, construction techniques, minimisation of carbon emissions beyond Part L, running costs and reduced use of potable water (suggested maximum of 105ltr per person per day). This document shall be submitted to, and approved in writing by, the Local Planning Authority.

The application for approval of reserved matters does not include a Sustainability and Energy Strategy and therefore the original condition, requested by my predecessor, has not been met.

It is therefore requested that the following condition be placed on any grant of permission:

Before any development a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day). This document shall be submitted to, and approved in writing by, the Local Planning Authority.

It is noted that MHVR and WHVS are discounted as usable technologies at the outset of the project and are referred to as potential 'bolt-on' technologies that could potentially be used to upgrade the property in the future. Neither of these technologies are appropriate for retro-fitting and, if adopted, should always be included at the beginning of the project.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmental-management/planning-requirements/>

Kind regards

Simon Davison PIEMA
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils - Working Together

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9 December 2020

Bradly Heffer
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this re-application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/20/03704
Location: Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ
Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Dear Brad,

No objection subject to securing biodiversity enhancements

Thank you for re-consulting Place Services on the above Reserved Matters application.

Summary

Further to our comments dated 2 November 2020, we have reviewed the amended plans and documents, including the updated Ecological Impact Assessment (SES Ltd, November 2020), Information to support Habitats Regulations Assessment (SES Ltd, November 2020), the Landscape master plan PR175-01n (Matt Lee Landscape Architects, November 2020) and the Boundary Types details (Drg ref: 8859 / 26).

We are still satisfied that there is sufficient ecological information available for determination.

The Landscape master plan (Matt Lee Landscape Architects, November 2020) shows that amended proposals relate to hard landscape features. Therefore, we still support the reasonable biodiversity enhancements contained in this landscaping scheme and recommend that the management of these features should be secured via a Landscape and Ecological Management Plan, which will be delivered prior to the commencement of development as secured by condition 13 of the Appeal decision.



In addition, we note that despite hedgehog highways in the timber fencing being recommended in para 4.85 of the amended Ecological Impact Assessment (EclA), these are not shown on either the ecological enhancement plan (Appendix 12 of the EclA, Nov 2020) nor the boundary types details. We therefore recommend that both the EclA and Drg ref: 8859/26 are updated to include this enhancement measure for this Priority species throughout the development and connectivity to the wider landscape. However, it is accepted that the provision of the Hedgehog Highways could also be secured by an additional condition of any consent as recommended below:

1. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENT LAYOUT

“A Biodiversity Enhancement Layout, providing the finalised details and locations of hedgehog Friendly Fencing as recommended in the Ecological Impact Assessment (SES Ltd, November 2020) shall be submitted to and approved in writing by the local planning authority.

The enhancement measures shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.”

Reason: To enhance Protected and Priority Species and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

Following recent discussion with the applicant’s ecologist, we look forward to details being submitted for the compensatory habitat for the Skylark nesting territories to be delivered offsite prior to commencement for both the construction period and post completion for this development. This has been secured under Condition 15 of 1832/17 granted at appeal for a Skylark Mitigation Strategy and linked to mitigation requirements under Condition 11 for a Construction Environment Management Plan (Biodiversity) so the LPA needs to ensure this is in place prior to commencement of this development.

This provides certainty for the LPA of the likely impacts on Protected and Priority species and, with appropriate mitigation measures secured, the development can be made acceptable.

This will enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Please contact us with any queries.

Yours sincerely,

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council



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



2 November 2020

Bradly Heffer
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this re-application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/20/03704
Location: Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ
Proposal: Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Dear Brad,

No objection subject to securing biodiversity enhancements

Thank you for consulting Place Services on the above Reserved Matters application.

We note that the Report to Inform a Habitats Regulation Assessment (1005463 HRA vf1 CL/DM, 29 October 2018) states that mitigation for predicted recreational impacts from this development was agreed between the applicant and the local authority in line with Natural England's advice. We are therefore satisfied that the proposal is unlikely to lead to adverse effects on the integrity of the internationally important designated sites listed above. We therefore have no objections, subject to the agreed mitigation options identified in the Shadow Habitats Regulation Assessment (HRA) report being secured through a legal agreement attached to any planning permission to deliver mitigation via the adopted Suffolk Coast RAMS.

We have reviewed the Design and Access Statement (LAP Architects, May 2020), the Landscape master plan PR175-01J (Matt Lee Landscape Architects, August 2020) and the Boundary Types details (Drwg ref: 8859 / 26).

We are satisfied that there is sufficient ecological information available for determination.



The Landscape master plan (Matt Lee Landscape Architects, August 2020) shows the site plans include an attenuation basin with wetland area and a series of swales. We welcome that the attenuation features will be seeded with wildflower grassland, small willow trees planted, the new open space will be seeded with flowering 'pollinator grassland' and that new trees will be planted in a variety of areas within the Site. We support the reasonable biodiversity enhancements contained in this landscaping scheme and recommend that it should be secured by a condition on any consent.

We note that the Boundary Types details (Drwg ref: 8859 / 26) does not show any hedgehog highways in the timber fencing so **we recommend that this drawing is amended to provide an enhancement for this Priority species throughout the development and into the wider landscape.** Subject to the minor amendment, we have no objection on ecological grounds.

This provides certainty for the LPA of the likely impacts on Protected and Priority species and, with appropriate mitigation measures secured, the development can be made acceptable.

This will enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

We note that the proposed locations of bird boxes (Swift boxes and Sparrow terraces), bat boxes, invertebrate log piles and reptile hibernacula have been identified in the 1832/17 Ecological Impact Assessment - ecological enhancement plan provided in Appendix 12 (SES, August 2020) submitted to discharge condition 20 of the consent granted at appeal under DC/20/03703.

We also note that the CEMP: Biodiversity submitted for DC/20/03703 states that Skylark will be displaced from the site during construction, it does not include any mitigation measures for ground nesting farmland birds. Paragraph 4.9 refers to the Skylark Mitigation Strategy required by condition 15 of the appeal decision but not its "prior to commencement" trigger. The CEMP will therefore need to be amended to include measures to avoid disturbing ground nesting birds and cross reference with the Skylark Mitigation Strategy.

We appreciate that the compensation for Skylark nesting territories will be contained in the documents to support discharge of Condition 15 of 1832/17 granted at appeal. As these will need to be offsite, we look forward to supporting the LPA with discussions with the applicant to ensure this is in place prior to submission.

We recommend that implementation of the details below is secured by a condition of any planning consent and support the recommended condition wording for a detailed landscape scheme provided by our landscape colleagues. We note that the Appeal decision contained a condition (13) for a landscape and ecological management plan (LEMP) to be agreed prior to the commencement of development. We therefore consider the details for long-term management of the open space have already been secured for implementation and we look forward to consultation on discharge of condition 13 when this document is submitted to the LPA.



Please contact us with any queries.

Yours sincerely,

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

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



Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

07/12/2020

For the attention of: Bradly Heffer

Ref: DC/20/03704; Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

Thank you for re-consulting us on the Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

Since we were last consulted the applicant has submitted a revised Landscape Masterplan (Drwg ref: PR175-01) and Boundary Treatments Plan (Drwg ref: 8859 / 25).

The revised Landscape Masterplan takes into consideration some of our previous comments, which is welcomed. Ideally, we would recommend a detailed landscape scheme with associated specification and schedule is submitted. However, these details can be conditioned if preferred. This detailed landscape scheme condition could be worded as follows:

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: DETAILED LANDSCAPE SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard, soft and boundary treatment landscaping works for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows in the surrounding area. A specification of soft landscaping, including proposed trees, plants and seed mixes must be included. The specification must be in line with British Standards and include details of planting works such as preparation, implementation, materials (i.e. soils and mulch), any protection measures that will be put in place (i.e. rabbit guards) and any management regimes (including watering schedules) to support establishment. This must be accompanied by a schedule, with details of quantity, species and size/type (i.e. bare root, container etc) and tree construction details. Hard landscape details such as surface materials and boundary treatments must also be included.

As stated in our previous consultation response, we would also advise the following amendments are considered as part of the detailed landscape scheme:

- It would be recommended that the hedge adjacent to the southern POS is planted in double staggered rows, preferably 5 plants per linear metre. To prevent access through

the hedge during establishment, we would expect the hedge to be accompanied by a 3 strand galvanised wire and tanalised softwood timber post fence, to BS1722- 2: 2006. The fence should be erected through the centre of the staggered row of hedge.

- We would expect to see details of measures to protect the trees to be retained on the site. It needs to be clear how work within the root protection areas (RPA) is being approached and what methods are being used. For instance, is specialist excavation/dig methods or ground protection being used?
- We would expect the pumping station to be screened with soft landscaping to ensure it is sympathetic to its landscape setting.
- The DAS makes reference to street trees, with different species proposed across the site to aid character and placemaking. However many of these look to be within private ownership. It would be useful to understand who will be responsible for which trees, and if within private ownership, is there scope to put a restrictive covenant in place?
- Where feature trees have been proposed in strategic locations such as junctions and focal points we would expect larger stock to be specified. For instance, the POS between plots 178-184 and the junction closest to the toddler play space.

Similarly, a landscape management plan will need to be provided as part of this application, or as a condition. We ask that reference is made to the guards to protect hedgerow/shrub planting from damage by rabbits and other rodents and we would expect these to be biodegradable. They should be checked periodically alongside the tree guards and stakes to ensure that they have not fallen over and are not damaging the plant. If conditioned, this should read as follows:

**ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT:
LANDSCAPE MANAGEMENT PLAN.**

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan and work schedule for a minimum of 5 years. Both new and existing planting will be required to be included in the plan, along with SuDS features and street furniture.

If you have any queries regarding the matter raised above, please let me know.

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Senior Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

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

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



Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

23/09/2020

For the attention of: Bradly Heffer

Ref: DC/20/03704; Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

Thank you for consulting us on the Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure.

This letter sets out our consultation response on the landscape and layout details. The documents referred to include the Landscape Masterplan (Drwg ref: PR175-01), Boundary Treatments Plan (Drwg ref: 8859 / 25) and Design and Access Statement (DAS).

Recommendations

Before approval can be recommended we would advise the following amendments and documents are considered:

- Street furniture such as bins and benches are included on the landscape masterplan, yet there is no furniture proposed within the POS to the south of the site. We understand this has a more informal character, however we would still expect furniture such as dog and waste bins to be considered as part of the POS provision, especially close to the built envelope edge.
- The Boundary Treatments Plan indicates where fences and walls are proposed. We would advise the side boundary to Plot 92 is also proposed as brick wall rather than close board fencing as it is adjacent to POS.
- It would be recommended that the hedge adjacent to the southern POS is planted in double staggered rows, preferably 5 plants per linear metre. To prevent access through the hedge during establishment, we would expect the hedge to be accompanied by a 3 strand galvanised wire and tanalised softwood timber post fence, to BS1722- 2: 2006. The fence should be erected through the centre of the staggered row of hedge.
- We would expect to see details of measures to protect the trees to be retained on the site. It needs to be clear how work within the root protection areas (RPA) is being approached and what methods are being used. For instance, is specialist excavation/dig methods or ground protection being used?

- We would expect the pumping station to be screened with soft landscaping to ensure it is sympathetic to its landscape setting.
- Although we welcome the use of timber knee rails. There are areas within the built envelope that could be treated with estate railings or similar. This would help articulate the change in character and also contribute to sense of place. For example, Plots 187-189 could have estate railings on their boundary instead.
- The DAS makes reference to Street trees, with different species proposed across the site to aid character and placemaking. However many of these look to be within private ownership. It would be useful to understand who will be responsible for which trees, and if within private ownership, is there scope to put a restrictive covenant in place?
- Currently a narrow landscape buffer is located along the northern boundary of the site, separating the new development from existing dwellings. We understand the reasoning for this space, however, we are concerned this may become a 'left over' space, for fly tipping and anti-social behaviour. We would advise the boundary treatments to Plot 17,20 and 21 be changed to brick wall to improve the quality of the space.
- Where feature trees have been proposed in strategic locations such as junctions and focal points we would expect larger stock to be specified. For instance, the POS between plots 178-184 and the junction closest to the toddler play space.
- The Landscape Masterplan only provides broad landscape terms for features proposed. Ideally, we would recommend a detailed landscape scheme with associated specification and schedule is submitted. However, these details can be conditioned if preferred. This detailed landscape scheme condition could be worded as follows:

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: DETAILED LANDSCAPE SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard, soft and boundary treatment landscaping works for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows in the surrounding area. A specification of soft landscaping, including proposed trees, plants and seed mixes must be included. The specification must be in line with British Standards and include details of planting works such as preparation, implementation, materials (i.e. soils and mulch), any protection measures that will be put in place (i.e. rabbit guards) and any management regimes (including watering schedules) to support establishment. This must be accompanied by a schedule, with details of quantity, species and size/type (i.e. bare root, container etc) and tree construction details. Hard landscape details such as surface materials and boundary treatments must also be included.

- Similarly, a landscape management plan will need to be provided as part of this application, or as a condition. We ask that reference is made to the guards to protect hedgerow/shrub planting from damage by rabbits and other rodents and we would expect these to be biodegradable. They should be checked periodically alongside the tree guards and stakes to ensure that they have not fallen over and are not damaging the plant. If conditioned, this should read as follows:

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan and work schedule for a minimum of 5 years. Both new and existing planting will be required to be included in the plan, along with SuDS features and street furniture.

If you have any queries regarding the matter raised above, please let me know.

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Senior Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

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

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

-----Original Message-----

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>

Sent: 23 November 2020 14:34

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Re-consultation Request - DC/20/03704

Public Realm have no objections to this development on open space grounds. There is a generous area of public open space and a toddlers play area within the development. The proposals to create ecologically rich open space is welcomes.

Regards

Dave Hughes
Public Realm Officer

-----Original Message-----

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 18 November 2020 08:54

To: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>

Subject: MSDC Planning Re-consultation Request - DC/20/03704

Please find attached planning re-consultation request letter relating to planning application - DC/20/03704 - Land West Of Old Norwich Road, Whitton, Ipswich, Suffolk IP1 6LQ

Kind Regards

Planning Support Team

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Appeal Decision

Inquiry opened on 11 December 2018

Site visits made on 11 & 20 December 2018

by Philip Major BA(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 4th March 2019

Appeal Ref: APP/W3520/W/18/3200941

Land west of Old Norwich Road, Ipswich IP1 6LH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Ashfield Land Limited against the decision of Mid Suffolk District Council.
 - The application Ref: 1832/17, dated 10 May 2017, was refused by notice dated 28 March 2018.
 - The development proposed is the erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works.
-

Preliminary Matters

1. The application was submitted with all matters except access reserved for future consideration. However, prior to the inquiry the Appellant asked that access be added to the reserved matters so that the proposal could be considered as a wholly outline proposal. Whilst initially opposing this request the Council agreed that there would be no prejudice to any party as a result of the further public consultation carried out by the Appellant. I agree that no prejudice to any party would result given this further consultation exercise, and on that basis I have accepted the amendment to the application. My consideration is based on all matters being reserved for future consideration. The drawings to be considered are numbered 1002 (Site Location Plan) and 3501 (Development Parameters).
2. The Appellant has indicated that were I minded to dismiss the appeal for the whole scheme, it would be open to me to issue a split decision. As the site is split into 2 distinct parcels this seems to me to be an option which I could, if appropriate, follow. The northern part of the appeal site is clearly severable from the southern part. The southern parcel of land is that which is suggested might be developed even if the northern parcel was deemed unacceptable. In accordance with established case law¹ there would be no prejudice caused to any party consulted on the original, larger, scheme since the nature of the proposal would be the same, but its extent and impact would be reduced. The southern section would, on the basis of the representations made, accommodate up to 190 dwellings. The land involved in the smaller scheme is shown on drawings numbered 1005 (Site Plan – Southern Land Parcel) and 3502 revA (Development Parameters).

¹ Inquiry documents 3 and 4

3. Parts of the appeal site (and in combination with other sites) are located within the zones of influence of protected European sites, these being the Stour and Orwell Estuary Special Protection Area (SPA/Ramsar site) and the Deben Estuary SPA/Ramsar site. Both are also Sites of Special Scientific Interest (SSSI). For brevity I will refer to them as European sites. Following recent case law² I am required to carry out an Appropriate Assessment (AA) under the Habitats Regulations. I also have a duty, which I have fulfilled, to consult with Natural England. I deal with the AA later.
4. The parties agree that the Council is unable to demonstrate a 5 year supply of deliverable housing sites. Although the Council does not accept that the supply is as low as 3.4 years (as set out in a recent appeal decision³) it nonetheless does not contest the fact that it cannot demonstrate a 5 year supply.
5. An obligation pursuant to S106 of the 1990 Act was submitted, by agreement, subsequent to the close of the inquiry. The obligation deals with a number of matters relating to financial contributions, the provision of affordable housing, open space provision and management, and travel plans. I have taken note of the statements of compliance with the Community Infrastructure Levy Regulations which were submitted with evidence. On the basis of the contents of the obligation and the compliance statements I am content that all matters conform to the CIL Regulations and that the obligation can be taken into account if planning permission is to be granted.
6. The parties have been given the opportunity to comment on the recent revisions to the National Planning Policy Framework (NPPF) 2019 and the publication of the housing delivery test results. I have taken due note of the comments received in reaching my decision. However, in essence, there is agreement that the only significant change relates to the AA and its relationship with the presumption in favour of sustainable development in the revised NPPF.

Decision

7. The appeal is dismissed insofar as it relates to the northern parcel of the application site shown on drawing No 1004 within the S106 obligation dated 8 January 2019. The appeal is allowed insofar as it relates to the southern parcel of land as delineated by the red line on drawing No 1005, dated December 2018 and planning permission is granted for the erection of up to 190 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works at land west of Old Norwich Road, Ipswich IP1 6LH in accordance with the terms of the application (as amended) Ref: 1832/17, dated 10 May 2017, and subject to the conditions set out in the schedule at the end of this decision.

Main Issues

8. The main residual issues⁴ in the appeal are:
 - (a) The impact of the proposed development on the local highway network;
 - (b) The impact of the proposals on the character and appearance of the surrounding landscape;

² *People over Wind, Peter Sweetman v Coillte Teoranta*

³ APP/W3520/W/18/3194926 dated 28 September 2018

⁴ Following the addressing of some of the reasons for refusal of planning permission prior to the inquiry

- (c) The impact of the proposals on the living conditions of future residents and nearby residents;
- (d) The impact of the proposals on heritage assets;
- (e) The benefits of the proposals and the overall planning balance.

Development Plan Policy Background

9. The development plan in this case includes the saved policies of the Mid Suffolk Local Plan (LP) and the Local Plan First Alteration (LP1), the Mid Suffolk Core Strategy (CS) and the Core Strategy Focused Review (CSR). Although a great many policies in the development plan are agreed in the Statement of Common Ground as being relevant, there is a more limited reliance on a small number of policies which have particular importance to this case.
10. CS Policies CS1 and CS2, together with LP Policy H7, set out a settlement hierarchy and seek to restrict development in the open countryside (this site being in open countryside). It is agreed that these policies are out of date because the Council cannot demonstrate a 5 year housing land supply and the Council does not seek to rely on them. Nevertheless the proposal is in conflict with these policies and they must be considered in the planning balance. However the weight to be attached to conflict with these policies is limited⁵.
11. The CSR includes Policies FC1 and FC1.1 which are of relevance. FC1 follows the guidance of the 2012 National Planning Policy Framework (NPPF) in that it supports sustainable development. The policy recognises that there may be situations when policies are out of date, and in those circumstances it seeks to facilitate the granting of planning permission unless material considerations indicate otherwise. The policy makes specific reference to the then NPPF paragraph 14 assessment and restrictive policies in the NPPF. I note here, though, that there is no equivalent limitation in Policy FC1 to that included in paragraph 177 of the 2018 NPPF⁶ and which was also contained in paragraph 119 of the 2012 NPPF. It is axiomatic that regard must have been had to the 2012 NPPF when drawing up Policy FC1, and paragraph 14 of that NPPF cross refers at footnote 9 to paragraph 119 of the document. Hence, although there is no specific reference in FC1 to the presumption in favour of sustainable development being 'removed' if appropriate assessment is needed, it seems to me to be at least implied.
12. In any event, even if there was a deliberate decision to seek to exclude the limitation of paragraph 119 it would have led to some inconsistency with the NPPF at that time. That inconsistency was carried forward following the publication of the 2018 NPPF. In the end, though, this is not a matter on which this case turns because of the revision in the NPPF issued in February 2019. As set out there, if an appropriate assessment is carried out and concludes that the scheme will not adversely affect the integrity of the European sites then the presumption in favour of sustainable development can apply. Policy FC1.1 essentially explains how Policy FC1 is to be implemented. It sets a number of general criteria.

⁵ The Inspector at the appeal cited earlier (3194926) attaches moderate weight, so the lack of full weight is agreed, and the differing gradation of weight makes no material difference in this case

⁶ That the presumption in favour of sustainable development did not apply where development requires appropriate assessment

13. Core Strategy Policy CS5 seeks to ensure that the landscape of the district and the historic environment are protected in an appropriate manner, and that development is of high quality design. However, it goes further than the statutory duty to have regard to the desirability of preserving or enhancing heritage assets, and the advice in the 2019 NPPF. For that reason its weight is limited.
14. Other policies of importance include LP1 Policy H4 in that it deals with affordable housing. It seeks up to 35% provision. It is agreed that this proposal accords with that policy. Similarly there is no dispute that the proposal is in accordance with, or can be designed to be in accordance with, those policies dealing with safe access, planning obligations and the design of development.
15. The Council, in conjunction with the neighbouring authority, has embarked on the preparation of a joint Local Plan. It is agreed that the early stage of this plan means that it carries little weight in this case.

Reasons

Highway Impact

16. It is not disputed that a suitable access point or points could be taken from Old Norwich Road. This would lead to traffic entering the wider network from Old Norwich Road principally at the 'Bury Road'⁷ junction to the south. The highway authority in this case has no objection to the proposals subject to the payment of contributions towards the improvement of local network junctions, or the improvement of the junctions themselves.
17. Traffic from the development (or the smaller development in the event of a split decision) would also impact upon the Whitton Church Lane junction. This gives priority to traffic on Old Norwich Road, but is at present mainly used by traffic flowing into and out of Whitton Church Lane. It is acknowledged that the configuration of the junction would require changes (at present it is unusual in having some block paving on the priority road) but a scheme has been drawn up to cater for that. This is not a matter of significant dispute between the main parties and I agree that as a technical exercise the junction can be altered to function satisfactorily.
18. The Bury Road junction situation is of greater dispute. There is a current scheme designed to address increases in traffic from the appeal proposals (the Figure 8.1b design). The highway authority is content with the scheme, but in light of other expected developments nearby it has indicated that an alternative and more comprehensive scheme would be preferred. However no such scheme has been designed as yet. Taking account of these other potential developments it is the highway authority's view that contributions to a more comprehensive scheme are preferable to the Figure 8.1b scheme being implemented, even if this would mean the final improvements took longer to bring about. In short, it favours the possibility of short-term pain for longer-term gain on the network.
19. To that end it is suggested that a financial contribution alone would be the appropriate course of action, which could be added to other contributions to fund an anticipated and more comprehensive junction scheme. However, I do

⁷ The term for the junction used by all parties at the inquiry

not accept that that would be a wise course of action in relation to the scheme as a whole because I have no information at all on when or whether a more comprehensive scheme for the junction might be brought about. In addition there is limited information on the timing of any of the other anticipated developments. Hence there is much uncertainty surrounding the comprehensive scheme favoured by the Highway Authority.

20. Nor am I persuaded that a 'Grampian' condition would be appropriate here. Planning Practice Guidance (PPG) makes it clear that such conditions should not be used where there is no prospect of the action in question being performed within the time limit imposed by the permission. As noted I have no evidence at all that any comprehensive scheme for the Bury Road junction would be provided by the Highway Authority within the time limit of the permission. Similarly I have no evidence that there would be a willingness on behalf of the landowner (the County Council) to allow the Figure 8.1b scheme, to address this proposal alone, to proceed. This is especially so given its stated preference for a more comprehensive alteration to the junction.
21. Taken in the round it is my view that until more work is carried out on the more comprehensive junction improvements preferred by the Highway Authority it is impossible to conclude that either that, or the Figure 8.1b scheme to mitigate the development on its own, is likely to be provided within a reasonable timescale. Allowing the proposed development in its entirety with unknown prospects for either of the junction improvements being implemented would not be a rational course of action as it would leave the potential for adverse highway conditions with no certainty of alleviation.
22. Turning to the actual impact of traffic, it is pertinent to note that the Bury Road junction already operates beyond capacity at certain times. It would still do so, but to a lesser extent, in the Figure 8.1b design. So if that scheme were to be implemented it would make the situation better if the appeal scheme were to be implemented alone. However, if it proved necessary to further revise the junction to cater for other future developments (the scenario the Highway Authority wishes to avoid) there would be clear potential for the network to suffer from delay and disruption for a prolonged period. It is impossible to quantify what the delay and disruption would be like in the absence of further information. But it is my judgement that the residual cumulative impact on the highway network has the potential to be severe.
23. However, the implications of development of the southern parcel alone are different. Traffic from the site would be significantly reduced. Any impact on the network even without a Bury Road junction improvement would also be reduced. Whilst it would be expected that the junction would be improved in one way or another in due course, the relatively short term potential for disruption here would be much lower. In my judgement any such reduction would be tolerable and would not result in a severe residual cumulative impact. I therefore take the view that development of the southern parcel only could be considered acceptable with a financial contribution being made towards a more comprehensive junction scheme.
24. There is some dispute about the actual design of the junction improvement so far brought forward (the Figure 8.1b design). Criticism is made of the configuration of the bus lane, left turn lane and cycle lane. Although not common (and not part of the experience of the Council's witness) I do not find

the junction design to be unacceptable or likely to present unacceptable safety implications. I am aware of similar configurations elsewhere, and in this case it seems to me that the design follows on from the first safety audit. The small loss of land in the lay by to the east of the junction is unlikely to make any practical difference to its use. My concerns about the junction therefore stem not from the technical possibility of mitigation, but from the likelihood of the junction being improved in a timely manner if the entire development were to be implemented.

25. The site is not far from the built up area of Ipswich. There are local facilities in the form of a nearby retail park, but it seems unlikely that most people would walk there. However, local schools are within walking distance, and I observed students walking and cycling during my site visits. I am also aware that Old Norwich Road is a designated cycleway, carries little through traffic because of the existing bus gate, and is a bus route. There are certainly alternatives to the private car available, notably cycling and buses. The bus service would be relatively close to the development (indeed in the larger scheme it is possible that the bus route would divert through the development). I am satisfied that the location of the site provides suitable alternatives to the use of the private car.
26. Pedestrian access along Old Norwich Road has been criticised because of the width of footways and the discontinuation of footways in places. I walked the length of Old Norwich Road from the likely access point to Bury Road on more than one occasion. It seems to me that the footway to the north of Whitton Church Lane has the potential to be improved by cutting back the overgrowth which has encroached. Although the junction with Whitton Church Lane has to be crossed if using the east side Old Norwich Road, it is possible to do so safely as a pedestrian. Thereafter the footway is sufficiently wide to the junction with Bury Road. On balance I consider that pedestrian access from the site to Bury Road can be made acceptable.
27. Taking this issue in the round it is my judgement that implementation of the entire scheme would have the potential to bring about a severe impact on the highway network, as set out above. That being the case there would be conflict with the NPPF.
28. In contrast the development of the southern parcel alone would be unlikely to have a severe impact and there would therefore be no conflict with the NPPF.

Character and Appearance

29. The appeal site is made up of 2 distinct areas. These can be described as the northern and southern parcels of land. They are divided by a substantial tree belt which crosses the land from east to west. The northern parcel includes the southern slope of a shallow valley and runs into that valley (as part of the identified area of Rolling Estate Farmlands (REA) in the Suffolk Landscape Character Study). The southern parcel is on the plateau land to the south of the valley where the valley side levels out (and is within the area known as the Plateau Estate Farmlands (PEA) in the same study). Additionally the Settlement Sensitivity Assessment (SSA) of July 2018 deals with the landscape fringes of Ipswich. The appeals site falls within the area designated IP1, and this includes parts of both the REA and PEA.

30. The SSA seems to me to include pragmatic assessments of the urban fringe around the appeal site, and in some ways this is more useful than the landscape character study. In particular I note that the sensitivity of IP1 is described as being associated with the small scale stream valley character and the dispersed pattern of built heritage. There is also recognition that the urban area of Ipswich occupies the plateau and is set back from the edge of the valley. In this context the SSA indicates that the landscape is highly sensitive to the visual intrusion of new development which has an urbanising influence on the character of the valley. These observations go to the heart of the case here.
31. In relation to the northern parcel the Council contends that it lies within a 'valued landscape'. The area identified for the purposes of evidence in this appeal centres on the valley and its slopes. However there is no statutory or other designation of the land which seeks to identify it as being valued. The main parties agree that it is helpful to consider value in relation to the Box 5.1 criteria set out in Guidelines for Landscape and Visual Impact Assessment, Third Edition. It is not necessary here to rehearse exhaustively all of the matters contained within Box 5.1. However I make the following observations based on the evidence I heard and my site visits:
- Landscape quality is variable and the effects of the A14, large pylons crossing the area, and visible structures on the edge of Ipswich are detractors from character. Quality, as would be expected, improves with distance from these influences.
 - Scenic quality and perceptual aspects are also heavily influenced by the above factors. Tranquillity is much reduced by the presence of the A14 in the vicinity of the site.
 - I do not accept that the landscape is rare. It seems to me to exhibit features which are commonplace throughout much of Suffolk and lowland Britain generally. There is nothing about the landscape which is particularly representative of any specific of its type.
 - No evidence has been adduced which indicates that this landscape has any unusual conservation interests, and there are no such designations.
 - The landscape is used by local people for recreation, and its proximity to residential areas in Ipswich gives it attraction in that respect.
 - There are no cultural associations or historical events which contribute to perceptions of this area.

Taking these matters together I have no doubt that it wrong to consider any of the appeal site to be a valued landscape in itself, or within a wider area which can be so regarded. It does not possess any qualities which take it beyond the ordinary. Even so I acknowledge that it is necessary to recognise the intrinsic character and beauty of the countryside in considering this issue.

32. Self-evidently, and as identified in landscape studies, the valley to the north (which includes the northern parcel) is different in character to the plateau to the south. The valley landscape is a pleasant and typical rolling English landscape with medium sized fields separated by hedgerows and tree belts. There is scattered settlement and a mixture of intimate and long range views.

- Valley sides are generally free from development. Although noisy the A14 is relatively inconspicuous and has spatially limited impact on the landscape.
33. Development of the northern parcel would have a significant impact on the landscape. It would introduce development on the valley side and lower slopes together with a road linking the 2 parts of the scheme. These would add an urbanising character which is absent from the valley generally. I agree that the valley sides are sensitive to development. The introduction of housing on the northern parcel would seriously and detrimentally impact on landscape character. This impact would be major to moderate.
 34. The southern parcel has a different character. It is relatively flat and close to the urban limits of Ipswich. Indeed I understand that the southern site boundary abuts land allocated for development. The land is perceived more as urban fringe than open countryside, and this is emphasised by the 2 lines of pylons and cables which cross it. In my judgement it has a moderate to low sensitivity to development, and the scheme would at worst have a moderate magnitude of impact on the character of the area.
 35. In visual terms the development would introduce an incongruous element into the landscape of the northern parcel. Even allowing for fleeting glimpses of the A14, and the nearby pylons, views towards the site from the north and east enable the viewer to perceive the attractive valley landscape, which hereabouts is relatively unspoiled. A large block of housing, with associated infrastructure, would be wholly at odds with the existing visual experience. I agree with the Settlement Sensitivity Study, which indicates that the landscape is sensitive to development which would urbanise the valley and lead to Ipswich spilling into the valley. The development would have a major and intrusive adverse visual impact notwithstanding that much of it would be on the lower slopes of the valley sides and within the valley bottom itself.
 36. The southern parcel is relatively enclosed in visual terms. It is bounded by development (or land allocated for development) to the south, and there are a number of dwellings to the east along Old Norwich Road. When added to the enclosure provided by the tree belt to the north and the A14 to the west the sense of visual enclosure is significant. In this respect it is correct to describe the land as being of limited sensitivity to development. Views into the southern parcel are heavily restricted, though I acknowledge that it would not be possible to hide the proposal entirely. Some perception of houses would be possible above trees and between landscaping. Nonetheless the visual impact of development would be minor.
 37. I address here the gap between Ipswich and Claydon. The gap is substantial and is not wholly undeveloped. However, that part of the gap beyond the southern lip of the valley to the north has a distinctly rural feel. The visibility of the northern part of the entire development would be seen as an urban outlier within the gap, and would diminish its effectiveness in separating the settlements. This adds to my concerns in relation to the impact on character and appearance.
 38. To some degree the noise barriers which would be inevitable in the event of development proceeding would be visible. But these would be internal to the site and would be unlikely to have any material impact on either the character or appearance of the land.

39. Taking all these matters into account the effect of the proposal can be summarised thus:

- For the entire scheme there would be a major to moderate adverse impact on landscape character and the appearance of the area. Although landscaping could be introduced to soften the impact over time this would not overcome the fundamental harm caused by the serious intrusion of development into the valley landscape;
- For the southern parcel there would be a moderate impact on character and a minor impact on the appearance of the area. Both of these impacts would be reduced over time if a suitable landscaping scheme were to be introduced at reserved matters stage.

40. In relation to the whole scheme as proposed there would be conflict with the provisions of Core Strategy Policy CS5, though as set out above that conflict is moderated by the fact that the policy is not wholly in accord with the NPPF. The conflict with this policy would be much reduced if the development were to be restricted to the southern parcel of land.

Living Conditions

41. The appeal site is close to the busy A14 dual carriageway. The traffic noise from that highway is evident at the site, with the highest perceived noise levels, unsurprisingly, being close to the road. I heard much evidence at the inquiry in relation to the potential impact of mitigation in the form of acoustic barriers between the site and the A14. The evidence shows that significant reductions in noise could be achieved with the introduction of barriers of appropriate construction and height. There is agreement that it is technically possible to achieve an acceptable noise climate both within and outside new dwellings on the site and that this can be controlled at reserved matters stage.

42. The Appellant has indicated that in any future reserved matters application it will not seek to take forward the provision of sports pitches close to the existing dwellings along Old Norwich Road. I therefore have no doubt that it would be possible to design a residential and open space layout which would have limited impact on existing residents. The noise climate would change for local residents, but not to the extent that it would be unacceptably harmful to their living conditions. As a result I find no conflict with the development plan or the objectives of the NPPF in this regard.

43. Residual noise concerns are maintained by the Council in relation to the impact of the change in the noise climate on the character of the nearby Whitton Conservation Area (CA). I turn to that matter next.

Heritage

44. My duty under S.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires me to have special regard to the desirability of preserving or enhancing the character or appearance of a conservation area. The significance of the Whitton CA stems largely from remaining elements of the relationship between buildings, street pattern, open spaces and the rural hinterland to the north, which demonstrates its history as a small rural settlement sitting astride the main road north from Ipswich. It contains some historic buildings and a simple street layout. The removal of traffic when the A14 by-passed the area provided the impetus for designation so that the

village street scene could be protected. There is no disagreement between the main parties that the proposal would cause less than substantial harm to the character of the CA. No harm is alleged to the appearance of the CA itself or to listed buildings or their settings within it. I have no reason to disagree with these points.

45. It is common ground that it is the character of that part of the CA to the north of the junction with Whitton Church Lane which would be affected by increased traffic and activity. The disturbance would be largely noise generated, though the passing of traffic and pedestrians would also have a visual impact and reduce the perception of tranquillity to a degree. Even so the CA as a whole would be little affected by the development. Noise increases would be at or close to the lowest observable adverse effect level, and even if slightly greater would be unlikely to significantly affect the appreciation of the significance of the CA. The less than substantial harm identified would be close to being insignificant given the level of existing traffic in the CA. As the CA is outside the boundary of Mid Suffolk development plan policy from that Authority cannot apply here.
46. However, it is still essential that great weight attaches to the identified harm as set out in the NPPF. This must be balanced against the benefits of the proposal, and I turn to that shortly.

Appropriate Assessment

47. The appeal site is just over 6km from the nearest part of the European protected sites (in this case the Stour and Orwell Estuary) noted in paragraph 3 above, well within the 13km zone of influence. The site is some 12 km from the Deben Estuary, again within the 13km zone of influence. Each of the protected sites has a number of qualifying features including waterfowl and other species.
48. Consideration of the potential effects of the recreational use of the European sites by residents of the proposed development has been carried out. This concludes that there is likely to be a significant effect on the Stour and Orwell Estuaries through increased disturbance to qualifying species both alone and in combination with other plans or projects. With regard to the Deben Estuary it is concluded that there is likely to be a significant effect only in combination with other plans or projects in light of the distance of the appeal site from the estuary.
49. In order to mitigate any adverse effects on the European sites it is proposed to provide greenspace within the proposed development, and to promote the local footpath network, in order to reduce any recreational pressure on the Stour and Orwell Estuaries from the development. In relation to both European sites it is also proposed to make proportionate contributions to fund offsite visitor management measures in line with the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). These matters are contained in the Report to Inform a Habitats Regulations Assessment (RIHRA)⁸.
50. Natural England has responded⁹ to the effect that it has no objection to the proposed development subject to appropriate mitigation being secured in line with the proposals in the RIHRA made by the Appellant.

⁸ Core Document 8.2

⁹ By correspondence dated 12 February 2019

51. The Planning Obligation pursuant to S106 of the 1990 Act (see above) deals with the provision of open space and contributions towards RAMS. The public open space is to be provided in accordance with a scheme to be agreed, which is to include specifications, plans and drawings, together with timings and triggers. As this is an outline application, the Council also retains further control over the layout of the open space. The RAMS contribution would be paid prior to development commencing. Taken together these mechanisms are sufficient to ensure that the mitigation necessary to avoid harmful effects on the European sites can be avoided.

Benefits of the Proposed Development and Planning Balance

Benefits

52. Benefits of the development principally extend from the provision of market and affordable housing in a location where there is an acknowledged shortfall of supply. The exact number of dwellings likely to be completed on this site in the 5 year period is unknown. Unsurprisingly the Appellant takes an optimistic view of delivery, whilst the Council is more circumspect. In reality the number is inevitably dependent to some degree on external factors which are difficult to predict. I take account of the fact that there have been expressions of interest from 3 independent parties who would wish to investigate the possibility of acquiring the land. This is an important factor, though it does not establish that the land would be sold, or when. In order for this site to be considered deliverable in the event of outline permission being granted there would need to be clear evidence that housing completions will begin on site within 5 years (as set out in the NPPF).
53. I do not doubt the intention to dispose of the land to a developer, but beyond that timing is uncertain. Any developer would need to submit a reserved matters application and discharge any necessary conditions prior to work commencing. I share the Council's view that the Appellant is being optimistic in lead-in times and annual delivery rates given the delivery achieved on other sites. Taking a pragmatic position based on the evidence I consider that actual delivery would be likely to fall somewhere between the expectations of the main parties. Even though it is likely to be lower than suggested by the Appellant housing delivery on the site carries significant weight in favour of the proposal notwithstanding that I accept that there would be a relatively limited supply from this site in the 5 year period.
54. New housing on the site would contribute to economic benefits in the form of direct jobs during construction, additional business for suppliers, Council Tax receipts, and the stimulation of additional future expenditure in local centres. This is a matter which is of moderate weight, though I acknowledge that any job provision and spending by residents of this site are likely to contain an element of job provision and spending displaced from elsewhere.
55. Green infrastructure would be provided on site and this would provide some benefit to local people in giving access to areas currently without public access (albeit in an urban fringe setting). Similarly green space could contribute towards expressed objectives for green corridors and a green rim to the north of Ipswich. The green spaces provided would be determined at reserved matters stage, and to some extent at least would be required with the development as mitigation. Such provision is not therefore wholly a benefit. However I give it moderate weight as a benefit.

56. The benefits above are important and significant when taken as a whole, particularly the provision of market and affordable housing. These benefits are clearly sufficient to outweigh the less than substantial harm to the Whitton Conservation Area.

Whole Scheme Planning Balance

57. The 'tilted' balance flowing from paragraph 11 of the NPPF (2019) is engaged because the appropriate assessment above concludes that the project will not adversely affect the integrity of the European sites, and the most important development plan policies for determining the appeal are out of date. That said the starting point here remains that the proposed development conflicts with the development plan, as set out earlier. However, the fact that policies are out of date or inconsistent with the NPPF reduces the weight of that conflict.

58. I have found that there would be significant harm to the character and appearance of the landscape from the whole scheme. I have also found that there would be likely to be harm in relation to the impact on the highway network, and that that impact would be likely to be severe (to the extent that it is possible to make a judgement based on the evidence before me). The harm caused by the development would be offset to a degree by the benefits of the proposal; those benefits being significant. Overall, however, it is my judgement that the harm would significantly and demonstrably outweigh the benefits. Thus, even with the 'tilted' balance applied the harm is so adverse that planning permission should not be granted as the development would not be sustainable.

Partial Scheme Planning Balance

59. Turning to the possibility of development on the southern parcel only, it is clear that the benefits would be largely the same, although reduced to a degree. However, the harm associated with this scale of development would be significantly less than for the entire scheme. Harm to landscape character and appearance would be at a level which would be very much reduced and would be capable of mitigation. Additionally impact on the highway network would be likely to be of a significantly lesser magnitude even if there is a delay in providing an improved Bury Road junction arrangement. Although there is still conflict with the development plan the benefits of the smaller scheme are compelling and outweigh the limited development plan conflict. In relation to the reduced scheme on the southern parcel of land the harm would not significantly and demonstrably outweigh the benefits. The presumption in favour of sustainable development here means that planning permission should be granted for the scheme on the southern parcel of land.

60. This is therefore a case where a split decision can be issued, and part of the development can be permitted.

Conditions

61. A list of suggested conditions was handed in at the inquiry. For the most part these are uncontentious. The conditions are listed under various topic headings, which I deal with in a similar manner. Where necessary I have amended wording to improve precision and enforceability.

- The reserved matters submission timetable is agreed as necessary to encourage speedy development.

- Transport related conditions are reasonable and necessary to ensure that access is satisfactory and that proper provision is made for occupants and visitors to the development. A construction management plan condition is necessary to ensure that the development phase is carried out in an acceptable manner. It is also necessary to include conditions to ensure that surface water does not flow onto the highway and to prevent refuse bins being stored on the highway. The provision of new bus stops is necessary to encourage bus use and can reasonably be required by condition.
 - Conditions are necessary to ensure that any unexpected contamination found on the land is properly dealt with.
 - Conditions dealing with drainage of the site are necessary to ensure that details are submitted which demonstrate that the site can be adequately drained, with subsequent management of the drainage network. It is also reasonable to require details of fire hydrants to be provided.
 - For reasons supporting a sustainable development conditions seeking the best possible broadband connections, and electric vehicle charging points, are reasonable and necessary.
 - Conditions which require an environmental management plan, and a biodiversity enhancement plan, together with other details for protecting or enhancing ecological resources are reasonable and necessary.
 - It is reasonable and necessary to include conditions which seek to ensure that landscaping carried out as part of the development is provided at the appropriate time, and replaced when necessary. Management of the landscape and protection of trees should also be ensured by condition.
 - A condition requiring the recording of any archaeological finds is reasonable and necessary in order that such finds are properly catalogued.
62. In addition, in light of my conclusions on the matter of the alteration to the Bury Road junction, and the provision of the contribution in the S106 obligation, I do not consider that it is also necessary to require a condition requiring that the junction be improved. It is also unnecessary to require conditions relating to the provision of secondary or emergency access points as these are adequately covered elsewhere. This applies equally to the provision of a bus gate (if needed at all in the smaller scheme).
63. A number of other suggested conditions are not necessary, as accepted at the inquiry, and I do not address them specifically here.

Overall Conclusion

64. For the reasons given above I conclude that the appeal should be allowed in part and dismissed in part.

Philip Major

INSPECTOR

SCHEDULE OF CONDITIONS

- 1) Details of the access, appearance, landscaping, layout, and scale (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 2 years from the date of this permission.
- 3) The development hereby permitted shall commence not later than 1 year from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following drawings and/or such other drawings/documents as may be approved by the Local Planning Authority in writing pursuant to other conditions of this permission or such drawings/documents as may subsequently be approved in writing by the Local Planning Authority as a non-material amendment following an application in that regard:
Site Location Plan (Drawing No 1005);
Parameters Plan (Drawing No 3502 revA)
- 5) No part of the development shall be commenced until details of the proposed primary access to the eastern boundary of the site from Old Norwich Road (including the provision of any gates to be erected and visibility splays provided) have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form.
- 6) Before the development is commenced, details of the estate roads and footpaths (including layout, levels, gradients, surfacing and means of surface water drainage) shall be submitted to and approved in writing by the Local Planning Authority.
- 7) Before the development 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 the 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;
 - j) monitoring and review mechanisms;
 - k) details of delivery times to the site during the construction phase;
 - l) wheel washing facilities;
 - m) location and nature of compounds and storage areas (including maximum storage heights) and factors to prevent wind-whipping;
 - n) waste storage and removal;

- o) temporary buildings and boundary treatments;
- p) noise and vibration management (to include arrangements for monitoring, and specifically for any concrete breaking and any piling);
- q) litter management during the construction phases of the development;
- r) during any ground works/construction there shall be no burning of materials on the site;
- s) any external lighting associated with the development during any ground works/construction for the purposes of security and site safety shall prevent upward and outward light radiation.

Thereafter, the approved construction plan shall be fully implemented and adhered to during all phases of the development approved, unless otherwise agreed in writing by the Local Planning Authority.

- 8) Before the development is commenced details shall be submitted to and approved in writing by the Local 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.
- 9) 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 has been 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.
- 10) No development shall commence until a scheme for the provision of fire hydrants has been submitted to and approved in writing by the Local Planning Authority. The scheme as approved shall be implemented in full in accordance with the agreed details, including the timescale for provision.
- 11) A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. The CEMP (Biodiversity) shall include details of the following:
 - a) risk assessment of potentially damaging construction activities;
 - b) practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction;
 - c) the location and timing of sensitive works to avoid harm to biodiversity features;
 - d) responsible persons and lines of communication;
 - e) use of protective fences, exclusion barriers and warning signs;
 - f) the containment, control and removal of Schedule 9 invasive species;
 - g) precautionary mitigation measures for small mammals (Priority Species).The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.
- 12) Prior to the commencement of development, a tree survey and arboricultural method statement in accordance with BS5837:2012 shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in full accordance with the approved statement.
- 13) Prior to the commencement of development a landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the Local Planning Authority. The content of the LEMP shall include the following:
 - a) description and evaluation of features to be managed;

- b) ecological trends and constraints on site that might influence management;
- c) aims and objectives of management;
- d) appropriate management options for achieving aims and objectives;
- e) prescriptions for management actions;
- f) preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- g) details of the body or organization responsible for implementation of the plan;
- h) ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) 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.

- 14) Before development commences a reptile method statement shall be submitted to, and approved in writing by the Local Planning authority, and shall be implemented in full accordance with the agreed details.
- 15) Before development commences a skylark mitigation strategy shall be submitted to and approved in writing by the Local Planning Authority. The mitigation shall be implemented in accordance with the approved mitigation strategy prior to the commencement of development.
- 16) No development shall take place until a feasibility study has been undertaken and submitted to the Local Planning Authority which investigates the potential for the dwellings hereby approved to be connected to super-fast and ultra-fast broadband. Should the study determine that such connection is feasible then details of the means by which the dwellings hereby approved may be connected to the utilities to be provided on site to facilitate super-fast broadband connectivity shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.
- 17) Concurrent with the first reserved matters application, and any subsequent reserved matters application, details of a scheme for acoustic measures to protect residential amenity shall be submitted to and approved in writing by the Local Planning Authority and implemented in full in accordance with the approved details prior to the first occupation of the dwelling to which the measures relate.
- 18) Concurrent with the first reserved matters application 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 Flood Risk Assessment (FRA) by Hydrock, dated September 2017, 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) when discharging into the chalk, the infiltration basin shall be no greater than 1m depth and shall be highly vegetated to protect ground water.

The scheme shall be fully implemented as approved.

- 19) Concurrent with the first reserved matters application details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.
- 20) Concurrent with the submission of the first reserved matters application, a biodiversity enhancement plan shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full accordance with the enhancement plan.
- 21) Prior to the commencement of works above slab level details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out for each dwellinghouse before that dwellinghouse is brought into use and shall be retained thereafter for no other purpose.
- 22) No dwelling shall be occupied until the parking areas, 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.
- 23) No dwelling shall be occupied until 2 bus stops, including raised bus stop kerbs, bus shelters and bus information screens, have been constructed and made available in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
- 24) The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.
- 25) Before the development is occupied details of the number, location and management of electric vehicle recharging points shall be submitted to and approved in writing by the Local Planning Authority. The details as approved shall be implemented prior to the occupation of any dwelling or in accordance with such phasing as may be agreed.
- 26) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written

approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

- 27) All changes in ground levels, hard landscaping, planting, seeding or turfing shown on the approved landscaping details shall be carried out in full during the first planting and seeding season (October - March inclusive) following the commencement of the development or in such other phased arrangement as may be approved, in writing, by the Local Planning Authority up to the first use or first occupation of the development. Any trees, hedges, shrubs or turf identified within the approved landscaping details (both proposed planting and existing) which die, are removed, seriously damaged or seriously diseased, within a period of 5 years of being planted or in the case of existing planting within a period of 5 years from the commencement of development, shall be replaced in the next planting season with others of similar size and species.
- 28) The developer shall keep a written record of any archaeological heritage assets encountered during the excavation and construction phases of development in a manner proportionate to their importance and impact and keep a public record of this information.

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr R Taylor	Queen's Counsel
He called:	
Prof R Tregay BSc(Hons) DipLD FLI FRGS	Director, Robert Tregay Limited
Mr C F Bentley BSc(Hons) CEnv CSci MCIEH MIEEnvSc MIOA	Associate Acoustic Consultant, Sharps Redmore
Mr G Eves BSc CEng MICE MCIHT	Director, PFA Consulting
Dr J Edis BA(Hons) MA PhD MCIfA IHBC	Managing Director, Heritage Collective UK Limited
Mr G Robinson BSc(Hons) MA MRTPI	Associate Director, DLP Planning Limited

FOR THE APPELLANT:

Mr N Cameron	Queen's Counsel
He called:	
Mr R Lyons MSc MCILT	Director, Transport Planning Associates
Mr A Corkill BSc(Hons) MSc MIOA	Managing Director, Spectrum Acoustic Consultants
Mr A McQuire BA(Hons) DipLA CMLI	Associate Director, Aspect Landscape Planning
Mr M Timlin BSc(Hons) MA IHBC MRTPI	Director, Turley Heritage
Mr J Richards BA(Hons) MTP MRTPI	Director, Head of Planning South West, Turley

INTERESTED PERSONS:

Mr R Fisk	Local Resident
Mr G Bates	Local Resident

DOCUMENTS HANDED IN AT THE INQUIRY AND RECEIVED SUBSEQUENTLY

- 1 Opening submissions on behalf of the Appellant
- 2 Opening submissions on behalf of the Council
- 3 Extract from *Care Link and the Trustees of the Formby Settlement v SoS for the Environment and another*
- 4 Extract from *Kent County Council v SoS for the Environment and Another*
- 5 Addendum to the Statement of Common Ground on noise matters
- 6 Copy email to Prof Tregay from Mr R Mills of Place Services
- 7 Expression of interest in the land from Barratt Homes, dated 13 December 2018

- 8 Expression of interest in the land from Ipswich Borough Council, dated 26 October 2018
- 9 Letter from Jacksons Fencing relating to the erection of acoustic fences
- 10 Email from the Local Highway Authority expressing a preference for the option of a more comprehensive highway scheme
- 11 Bundle of correspondence between Prof Tregay, Place Services and the Council
- 12 Draft list of suggested planning conditions
- 13 Note from PFA Consulting in relation to the proposals for the Bury Road junction
- 14 Suggested condition relating to the provision of bus stops
- 15 Response from Natural England to the Appellant in relation to the Shadow Habitats Regulations Assessment Report
- 16 Statement from Mr Bates
- 17 Draft S106 Agreement
- 18 *R (Laura C and Others) v LB Camden, SoS for the Environment Transport and the Regions, and Barratt Homes Ltd*
- 19 Closing Submissions on behalf of the Council
- 20 Closing submissions on behalf of the Appellant
- 21 Signed and dated S106 Agreement
- 22 Response from Natural England dated 12 February 2019
- 23 Comments received relating to the revised NPPF February 2019

PLANS

- A Drawing No 1005 – site plan of the southern parcel
- B Drawing No 3502 revA – development parameters of the southern parcel
- C Drawing No 3202 revA – illustrative concept masterplan of the southern parcel (not an application plan)

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Old Norwich Road, Whitton, Ipswich

Drainage Strategy, Non-technical Summary

190680/J Courtney

Approved By: J Waugh

29 Jan 2021

Status: **Final**

Version: 1.0

1.0 INTRODUCTION

- 1.1 Conisbee have been appointed by Bellway Homes Ltd. to provide civil engineering services to support the development of the site Land West of Old Norwich Road with 190 new residential dwellings.
- 1.2 During the planning process concern has been expressed about potential flooding issues both within the site and effecting neighbouring properties. This short report has been prepared to describe how the submitted drainage scheme functions and how these concerns have been addressed in the design.

2.0 THE EXISTING SITUATION

- 2.1 Generally the site slopes from west to east, (from the A14 towards Old Norwich Road), a coloured elevation plan (Figure 1) illustrates this fall in the context of the surrounding landscape. Historically the area would have drained into the stream to the north and east via a network of field ditches across the intervening land. The construction of the Old Norwich Road in its present form interrupted this drainage mechanism by trapping the water on its west side, creating the drainage problems encountered on the site today.

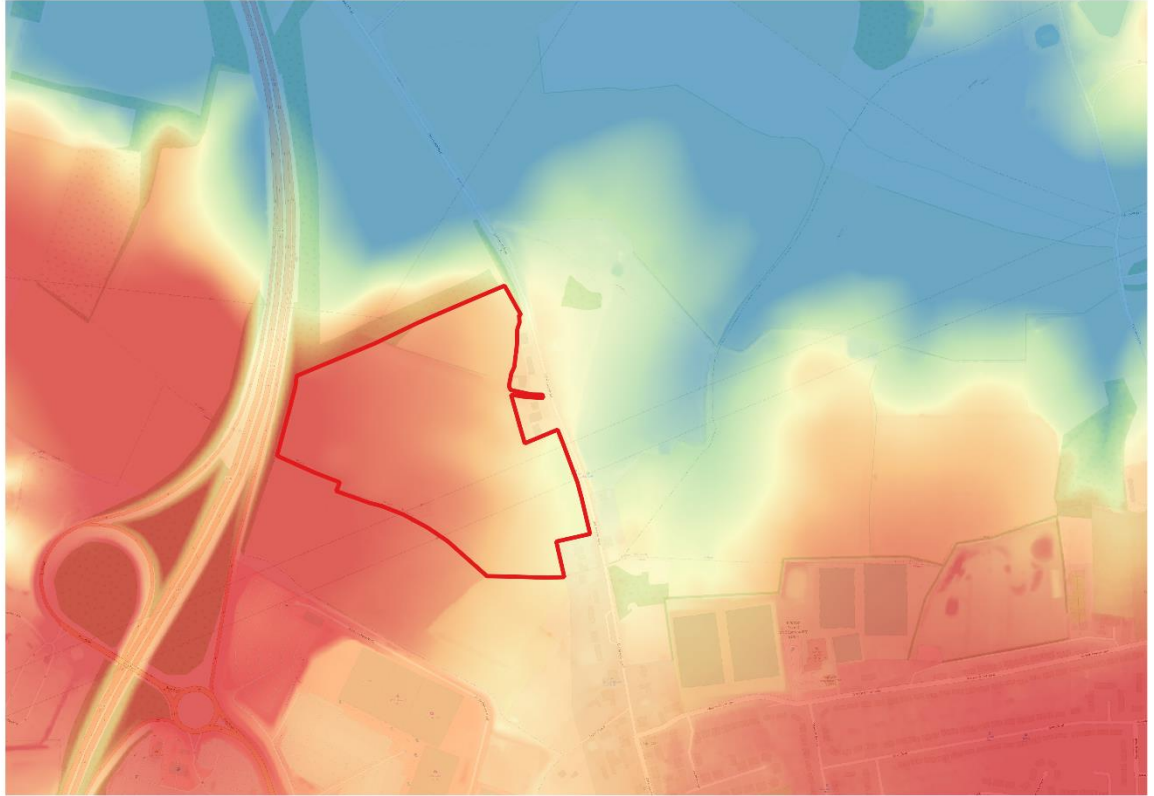


Figure 1 Elevation plan of the Old Norwich Road, red indicates higher elevations and blue lower elevations. (Data from EA LIDAR DTM and Open Street Map)

3.0 PROPOSED DEVELOPMENT

- 3.1 To appreciate the impact of the development it is important to understand how developing a site changes the surface water runoff patterns. When rain falls on an undeveloped site it would initially soak into the ground, if the ground is wet from an earlier storm or there is more rain than the soil can easily absorb then water will start to flow along the surface and eventually collect in low points, such as along the edge of Old Norwich Road.
- 3.2 Developing a site changes this behaviour, hard surfaces such as buildings and roads prevent water soaking into the ground like it did before, instead the water is collected in storm sewers and moved away from the development to prevent it flooding, the ultimate destination of this water then needs to be considered.

- 3.3 On Old Norwich Road it was decided that the best option was to infiltrate the water into the ground, a series of tests were carried out to determine which area had the best ground characteristics for infiltration. An area at the southern edge of the site was identified as being most suitable and a basin will be excavated there to store the rainfall runoff from the site while it drains into the underlying ground.
- 3.4 The impact on neighbouring properties has been carefully considered, for much of the site the introduction of a sewer network will ensure that overland runoff towards the adjacent dwellings will be no worse than for the existing situation. The infiltration basin has been designed in accordance with current best practice and Suffolk's drainage officer has been consulted throughout the process. It has been sized accommodate a storm with a 1% chance of occurring each year, including an allowance for more extreme storm events over the next 100 years due to climate change. As an additional safety precaution the infiltration rate used in the design is half that encountered during site investigations to guard against inconsistent ground conditions and degradation over the lifespan of the development.
- 3.5 Notwithstanding this, precautions have been taken to ensure that larger storm events wont impact neighbouring properties. The lowest side of the basin faces into the site and in a very extreme storm water would overflow here and flow down towards Old Norwich Road, where it can be safely stored until it naturally evaporates. This water will be prevented from leaving the site by the embankments formed by the site access road to the north and the proposed pumping station and an additional bank connecting it to the infiltration basin in the south. This arrangement is shown in Figure 2.
- 3.6 Following the construction of the infiltration basin and the sale of the houses on the site a management company will be appointed by Bellway Homes to maintain the communal areas of the site, including the infiltration basin. The maintenance activities this company is required to undertake are set out in the Landscape Management Plan and the SUDS Maintenance Plan that form part of the planning submission. Finally information on the basin will be provided to Suffolk County Council so it can be included on their SUDS asset register.

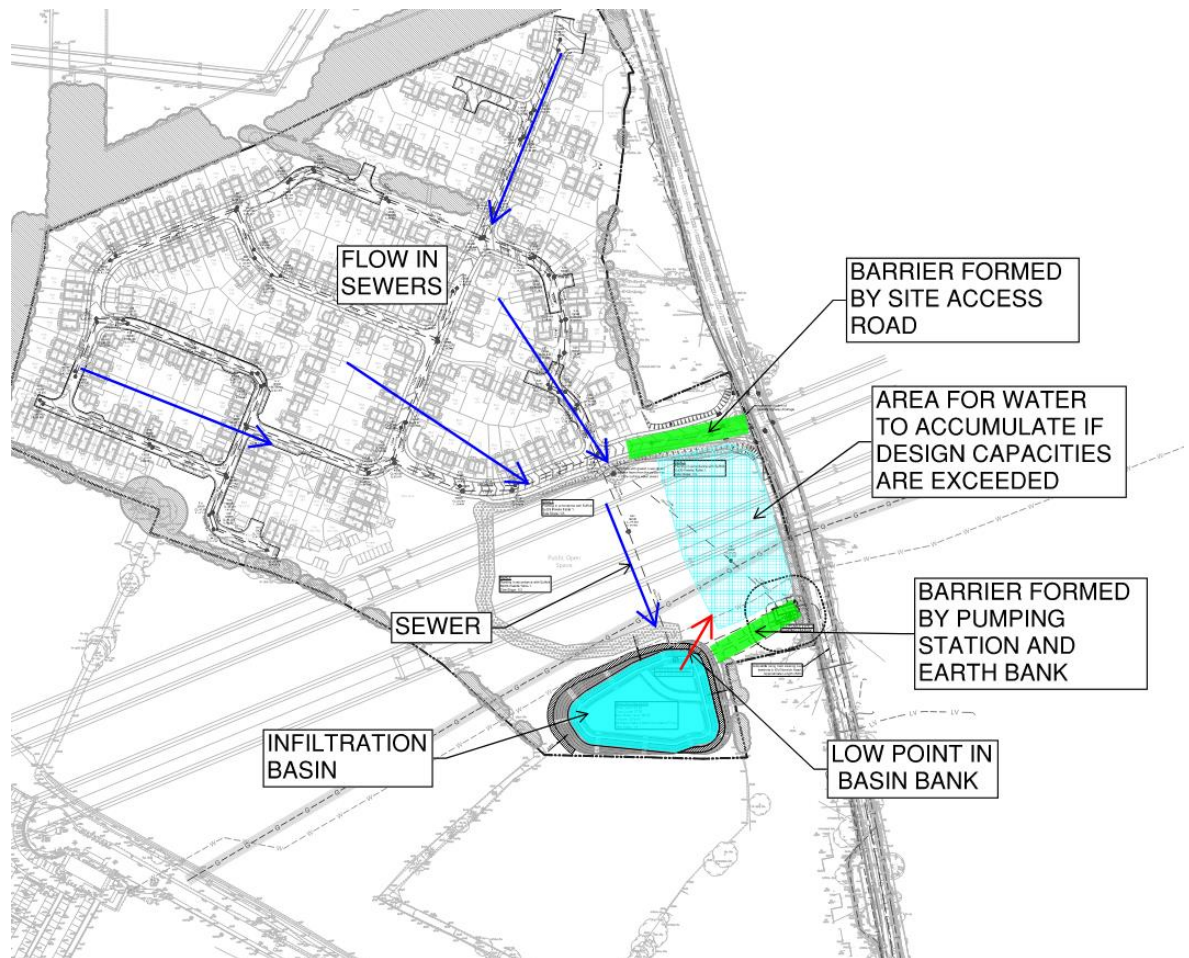
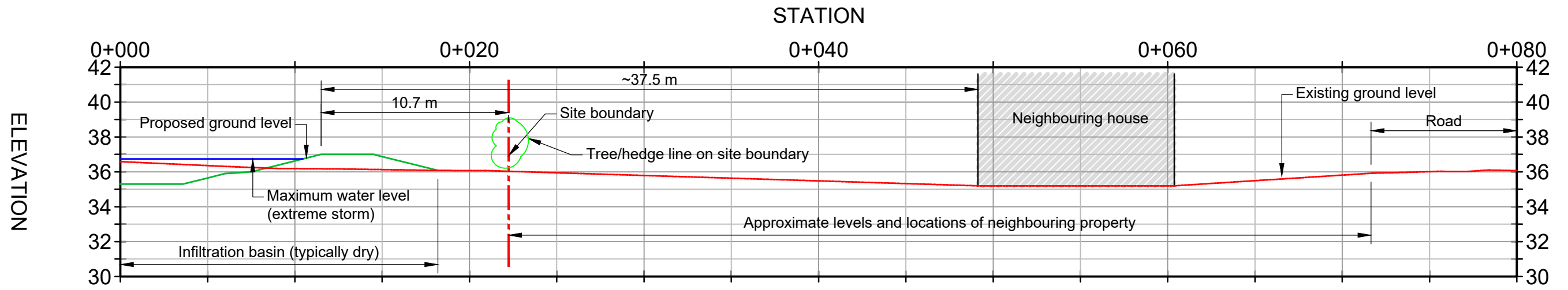


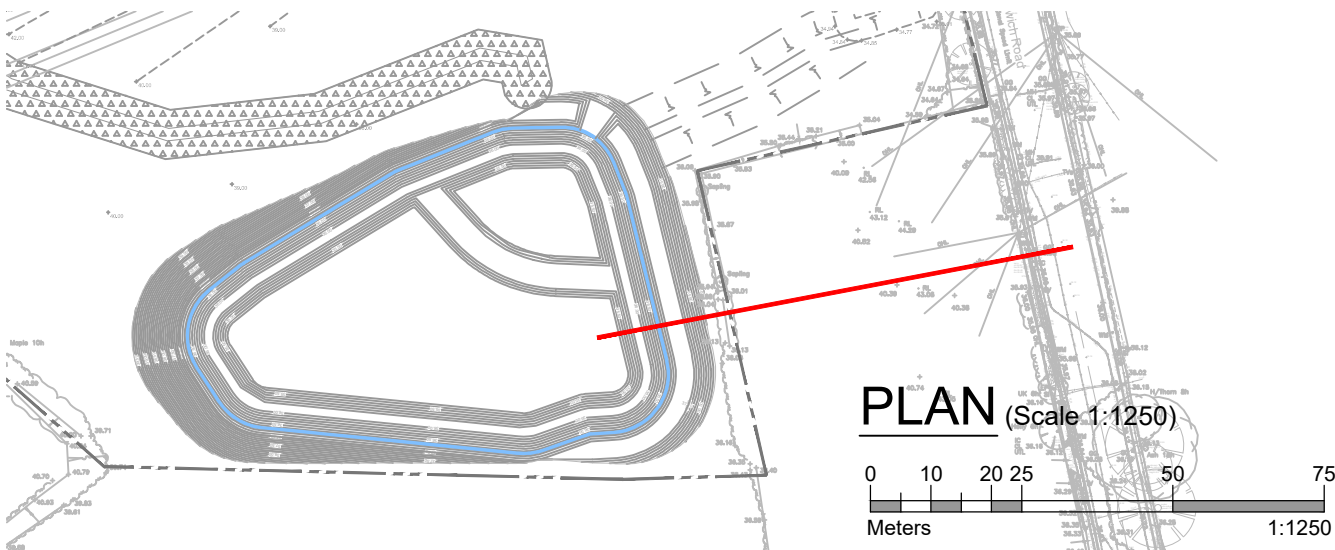
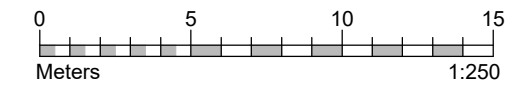
Figure 2 Post development flow routes across the site

4.0 CONCLUSION

4.1 As has been discussed in this report the development of the site will not increase the amount of water flowing overland from the site, ensuring there is no impact from the development on the neighbouring properties. All water will be managed on site and infiltrated into the ground and provision has been made to ensure extreme events don't result in any off site impact.



SECTION (Scale 1:250)



PLAN (Scale 1:1250)



NOT FOR CONSTRUCTION

P1	29.01.21	Issued for information	JC	JW
Rev	Date	Description	Drawn	Check
Drawing Status		Project No		
PRELIMINARY		190680		
Date	Drawn	Drawing No		
JAN 2021	JC	SK-014		
Scale	Engineer	Revision		
1:250@A3	JW	P1		

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Project
OLD NORWICH ROAD
WHITTON, IPSWICH

Title
SECTION THROUGH INFILTRATION
BASIN AND NEIGHBOURING PROPERTY

Old Norwich Road, Whitton
Bellway Homes Ltd Essex

Energy and Sustainability Statement

AES Sustainability Consultants Ltd

January 2021



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Revision	Author	Date	Comment
Rev.0	Silvio Junges	29.01.2021	Draft issue for comments
Rev.1	Silvio Junges	29.01.2021	Final Issue

This statement has been commissioned by Bellway Homes Ltd Essex to detail the proposed approach to energy and CO₂ reduction to be employed in development of the Old Norwich Road, Whitton site. It should be noted that the details presented, including the proposed specifications, are subject to change as the detailed design of the dwellings progresses, whilst ensuring that the overall commitments will be achieved.

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1. Introduction

Preface

- 1.1. This Energy and Sustainability Statement has been prepared on behalf of Bellway Homes Ltd Essex in support of the reserved matters application for development of Old Norwich Road, Whitton.

Development Description

- 1.2. The proposed development site is located on the north-western edge of Ipswich, just west of Whitton on the land between the A14 and Old Norwich Road. The administrative boundary for Ipswich/Mid Suffolk District runs close to the southern edge of the site.
- 1.3. Outline planning permission (1832/17 (approved at appeal – ref. APP/W3520/W/18/3200941)) and Draft Schedule of Conditions (Ref. DC/20/03704):

DC/20/03704 | Application for approval of reserved matters including Access, Layout, Scale, Appearance and Landscaping following outline planning application 1832/17 Allowed at Appeal APP/W3520/W/18/3200941 for residential development for up to 190 dwellings (Use Class C3) with public open space, vehicular access and associated infrastructure. | Land West Of Old Norwich Road Whitton Ipswich Suffolk IP1 6LQ

- 1.4. Figure 1 shows the proposed site layout, and comprises the construction of 190 residential dwellings across a mix of one to four bedroom bungalows and houses.

Purpose and Scope of the Statement

- 1.5. The statement has been prepared to address Condition 6 of the Draft Schedule of Conditions (DC/20/03704), and to address national and local policy relating to sustainable design and construction of dwellings, including relevant policies within the Mid Suffolk District Council Core Strategy, adopted in September 2008, and the Mid Suffolk Core Strategy Focused Review, adopted in December 2012



Figure 1. Proposed Site Layout – Old Norwich Road, Whitton, Ipswich

2. Planning Policy and Conditions

Conditions of Draft Schedule of Conditions

- 2.1. The statement will address Condition 6 of the Draft Schedule of Conditions (DC/20/03704).

6. SUSTAINABILITY AND ENERGY STRATEGY

Prior to commencement of development above slab level, a Sustainability & Energy Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall detail how the development will minimise the environmental impact during construction and occupation including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water. The development shall be carried out in accordance with the approved strategy.

Reason – To enhance the sustainability of the development through better use of water, energy and resources, reduce harm to the environment and promote wider public benefit in accordance with the NPPF.

Local Planning Policy

- 2.2. Mid Suffolk's Core Strategy was adopted in September 2008. The Development Plan sets out the vision, objectives, spatial strategy and core policies that will guide development across the district until 2025, and beyond.
- 2.3. A Core Strategy Focused Review was undertaken and adopted by the Council in December 2012. The review was carried out in order to update certain sections of the 2008 Core Strategy with recent information. The response for sustainable developments for Mid Suffolk is as follows:

- 3.5 Sustainable development principles combine the three elements necessary to achieve an appropriate balance in that development needs to be environmentally, economically and socially sustainable. All three elements are of importance for the Mid Suffolk area and find expression within "Caring for the Heart of Suffolk" - the Community Strategy for Mid Suffolk 2004.
- 3.6 The UK Sustainable Development Strategy (2005) recognises that while policies must be underpinned by all 5 sustainable development principles in order to achieve the necessary balance some policies will place more emphasis on certain principles than others. This Core Strategy and other documents of the Mid Suffolk new style Local Plan aim to strike an appropriate balance between the social, environmental and economic elements of sustainability in the local context.
- 3.7 There are some key local considerations with a particular bearing on this balance, many of which Mid Suffolk shares with neighbouring Babergh District Council with whom we will be working jointly and sharing services in the near future. For example:
- Local circumstances mean that the achievement of environmental sustainability will often be limited in transport terms, due to the dispersed rural nature of the district.
 - The environmental and landscape sensitivity of the district means that large-scale, on-shore renewable energy generation will often be difficult to accommodate in the landscape in an acceptable way.
 - The attractions of the countryside for tourism for the district, an important sector of the local economy, mean that maintaining its environmental qualities while promoting access is essential.
 - The district's dispersed rural nature, plus its relationship to nearby large urban areas like Ipswich and Bury St Edmunds presents a range of challenges when promoting employment for local prosperity
 - The need to promote the rural economy, providing maximum opportunities to deliver rural affordable housing and safeguarding rural facilities and services.

- 2.4. The national framework underpins this approach to sustainable development and this focused review includes the model Policy FC 1 below:

Policy FC1 - Presumption in favour of sustainable development

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.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

Specific policies in that Framework indicate that development should be restricted.

- 2.5. Policy FC1.1 will help to ensure that the Core Strategy and the Stowmarket Area Action Plan (SAAP) are in conformity.

Policy FC 1.1 Mid Suffolk approach to delivering Sustainable Development

In line with policy FC 1, development proposals will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development as interpreted and applied locally to the Mid Suffolk context through the policies and proposals of the Mid Suffolk new style Local Plan.

Proposals for development must conserve and enhance the local character of the different parts of the district. They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and the policies of the Mid Suffolk Core Strategy and other relevant documents.

The District Council encourages pre-application discussions and/or the use of development briefs and masterplans to address these matters prior to submitting planning applications and in relation to bringing forward proposed allocations. This approach is particularly relevant to the integration of the necessary physical, social and environmental infrastructure within development plans and proposals.

The Council will facilitate the delivery of integrated sustainable development through a variety of means, including the appropriate use of planning conditions and obligations, planning performance agreements, local and neighbourhood plans and orders, the introduction of CIL and supplementary planning documents.

National Planning Policy Framework

- 2.6. In February 2019, the Government published the updated National Planning Policy Framework (NPPF), which sets out the Government’s planning policies for England and how these are expected to be applied.
- 2.7. The planning process has been identified as a system to support the transition to a low carbon future in response to climate change by assisting in the reduction of greenhouse gas emissions and supporting renewable and low carbon energy.
- 2.8. Paragraph 150 sets out what is expected from new developments when considering strategies to mitigate and adapt to climate change:

150. New development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.

Current National Policy Standards

- 2.9. The NPPF requires that “local planning authorities should ...when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards.”¹
- 2.10. A policy announcement presented by HM Treasury as part of the July 2015 productivity plan “Fixing the Foundations”² advised that the Government considered that energy efficiency standards introduced through recent changes to Building Regulations ‘need time to become established’ and will therefore persist until further notice.
- 2.11. This statement therefore sets out details relating to building energy performance standards and proposes an approach through which these will be achieved in a manner which improves the long-term sustainability of the dwellings.

Code for Sustainable Homes

- 2.12. The Code for Sustainable Homes was a scheme sponsored by the government, intended to promote and support the transition to more sustainable homes. It is the Government’s view that the Code has achieved this aim, and has now been withdrawn following the conclusion of the Housing Standards Review on 25th March 2015.
- 2.13. The relevant extract from the statement to Parliament advises:
- “From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities...should not set...any additional local technical standards relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the Code...”*
- 2.14. This change is required to be reflected through amendments to all Local Plans, Neighbourhood Plans and supplementary planning documents. It is therefore anticipated that Core Strategy will be updated accordingly in due course to remove the requirements mandating certification of new development to Code standards.

Proposed Strategy

- 2.15. This statement is intended to establish the proposed approach to sustainable construction and energy and water demand reduction to be delivered at the proposed development of Old Norwich Road, Whitton.
- 2.16. The local policy does not set energy efficient targets more onerous than those included in the Building Regulations.
- 2.17. It is proposed that the dwellings will be constructed following a fabric first approach to meet, and exceed where possible, the current Building Regulations, with insulation standards, thermal bridging and air leakage all improved beyond the minimum compliance levels. In addition, consideration will be given to building design, passive solar design and energy efficient site-layouts where possible.
- 2.18. The following sections of this statement set out the sustainable design considerations which will be applied to the dwellings in order to deliver low energy, comfortable and affordable housing. This is in line with the National Planning Policy Framework.

¹ Department for Communities and Local Government, 2012, *NPPF, paragraph 95*

² HM Treasury, July 2015, ‘Fixing the Foundations’ Productivity Plan

3. Energy & CO₂ Reduction Strategy – Fabric First

Overview

- 3.1. The proposed construction specification and sustainable design principles to be applied to the development will ensure that each dwelling meets the CO₂ reductions mandated by Part L1A of the Building Regulations through fabric measures alone.
- 3.2. It is proposed that the CO₂ reduction strategy for the development incorporates further improvements beyond a Part L compliant specification and initially concentrates finance and efforts on reducing energy demand as the first stage of the Energy Hierarchy (Figure 2).

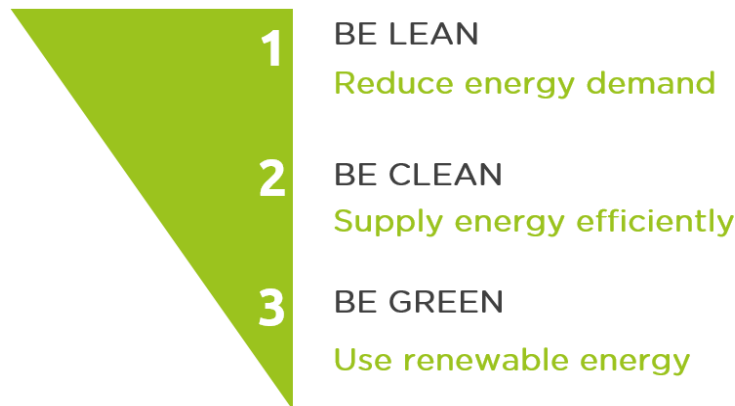


Figure 2. The Energy Hierarchy

Be Lean – reduce energy demand

- 3.3. The design of a development - from the masterplan to individual building design - will assist in reducing energy demand in a variety of ways, with a focus on minimising heating, cooling and lighting loads. Key considerations include:
 - Building orientation – maximise passive solar gain and daylight
 - Building placement – control overshadowing and wind sheltering
 - Landscaping – control daylight, glare and mitigate heat island effects
 - Building design – minimise energy demand through fabric specification

Be Clean – supply energy efficiently

- 3.4. The design and specification of building services to utilise energy efficiently is the next stage of the hierarchy, taking into account:
 - High efficiency heating and cooling systems
 - Ventilation systems (with heat recovery where applicable)
 - Low energy lighting
 - High efficiency appliances and ancillary equipment

Be Green – use low carbon / renewable energy

- 3.5. Low carbon and renewable energy systems form the final stage of the energy hierarchy and can be used to directly supply energy to buildings, or offset energy carbon emissions arising from unavoidable demand. This may be in the form of:
 - Low carbon fuel sources – e.g. biomass
 - Heat pump technologies
 - Building scale renewable energy systems
 - Small-scale heat networks
 - Development-scale heat networks
- 3.6. As this hierarchy demonstrates, designing out energy use is weighted more highly than the generation of low-carbon or renewable energy to offset unnecessary demand. Applied to the development, this approach is referred to as ‘fabric first’ and concentrates finance and efforts on improving U-values, reducing thermal bridging, improving airtightness, and installing energy efficient ventilation and heating services.

- 3.7. This approach has been widely supported by industry and government for some time, particularly in the residential sector, with the Zero Carbon Hub and the Energy Savings Trust having both stressed the importance of prioritising energy demand as a key factor in delivering resilient, low energy buildings.
- 3.8. The benefits to prospective homeowners of following the Fabric First approach are summarised in Table 1.

Table 1. Benefits of the Fabric First approach

	Fabric energy efficiency measures	Bolt-on renewable energy technologies
Energy/CO ₂ /fuel bill savings applied to all dwellings	✓	✗
Savings built-in for life of dwelling	✓	✗
Highly cost-effective	✓	✗
Increases thermal comfort	✓	✗
Potential to promote energy conservation	✓	✓
Minimal ongoing maintenance / replacement costs	✓	✗
Significant disruption to retrofit post occupation	✓	✗

Building Regulations standards – Fabric Energy Efficiency

- 3.9. In addition to the CO₂ reduction targets, the importance of energy demand reduction was further supported by the introduction of a minimum fabric standard into Part L1A 2013, based on energy use for heating and cooling a dwelling. This is referred to as the 'Target Fabric Energy Efficiency' (TFEE), and expressed in kWh/m²/year.
- 3.10. This standard enables the decoupling of energy use from CO₂ emissions and serves as an acknowledgement of the importance of reducing demand, rather than simply offsetting CO₂ emissions through low carbon or renewable energy technologies.

- 3.11. The TFEE is calculated based on the specific dwelling being assessed with reference values for the fabric elements contained within Approved Document L1A. These reference values are described as 'statutory guidance' as opposed to mandatory requirements, allowing full flexibility in design approach and balances between different aspects of dwelling energy performance to be struck so that the ultimate goal of achieving the TFEE is met. The proposed approach and indicative construction specifications are set out in the following sections of this Strategy.

4. Improved fabric specification

- 4.1. In order to ensure that the energy demand of the development is reduced, the dwellings have been designed to minimise heat loss through the fabric wherever possible.
- 4.2. Table 2 details the proposed fabric specification of the major building elements, with the first column in this table setting out the Part L1A limiting fabric parameters in order to demonstrate the potential improvements.

Table 2. Indicative construction specification – main elements

	Part L1a Limiting Fabric Parameters	Specification
External wall – u-value	0.30 W/m ² K	0.24-26 W/m ² K
Party wall – u-value	0.20 W/m ² K	0.00 W/m ² K
Plane roof – u-value	0.20 W/m ² K	0.11 W/m ² K
Ground floor – u-value	0.25 W/m ² K	≤ 0.15 W/m ² K
Windows – u-value	2.00 W/m ² K	1.30 W/m ² K
Doors – u-value	2.00 W/m ² K	≤ 1.30 W/m ² K
Air Permeability	10 m ³ /h.m ² at 50 Pa	5.01 m ³ /h.m ² at 50 Pa
Thermal Bridging	Y = 0.150 (default)	Calculated

- 4.3. The proposed specification is demonstrated to exceed the minimum requirements of L1A 2013.

Thermal bridging

- 4.4. The significance of thermal bridging as a potentially major source of fabric heat losses is increasingly understood. Improving the U-values for the main building fabric without accurately addressing the thermal bridging will not achieve the desired energy and CO₂ reduction targets.
- 4.5. The specification should seek to minimise unnecessary bridging of the insulation layers, with avoidable heat loss therefore being reduced wherever possible. Accurate calculation of these heat losses forms an integral part of the SAP calculations undertaken to establish energy demand of the dwellings, and as such thermal modelling will be undertaken to assess the performance of all main building junctions. It is anticipated that the average total Y value will be around 0.050, against a SAP default figure of 0.150.

Air leakage

- 4.6. After conductive heat losses through building elements are reduced, convective losses through draughts are the next major source of energy wastage. The proposal adopts an airtightness standard of 5.01 m³/h.m² at 50Pa, with pressure testing of all dwellings to be undertaken on completion to confirm that the design figure has been met.

Provisions for Energy-Efficient Operation of the Dwelling

- 4.7. The occupant of the dwelling should be provided with all necessary literature and guidance relating to the energy efficient operation of fixed building services. Currently it is assumed that all dwellings will be provided with modern gas-fired heating systems, fully insulated primary pipework, and controls including programmers, thermostats and Temperature Radiator Valves to avoid unnecessary heating of spaces when not required.

5. Overheating Risk and Passive Design

- 5.1. Dwellings constructed today may be operating in a substantially different climate over the coming decades, and therefore should be designed to ensure that they are able to adapt and reduce the risk of overheating with potentially higher summer temperatures and longer hot spells.
- 5.2. Key design decisions can affect the potential risk of overheating:
- Poor consideration of orientation of large glazed facades
 - Maximising for daylight without considering implications of solar gain
 - High density development contributing to urban heat island effects
 - High glazing ratios contributing to excessive unwanted solar gain
 - Inadequate ventilation strategies
 - Very high levels of thermal insulation without considering heat build-up
- 5.3. Other factors which additionally contribute to heat build-up within homes and should be addressed where possible include:
- High levels of occupation
 - Appliance use contributing to internal gains

Cooling hierarchy

- 5.4. In common with sustainable heating strategies, it is possible to apply a sustainable 'cooling hierarchy' which sets out the priorities to ensure overheating risk is minimised:
- Minimise internal heat gain
 - Manage heat through internal thermal mass and design of spaces
 - Passive ventilation strategies
 - Mechanical ventilation systems
 - Active cooling systems

Addressing overheating risk

- 5.5. The design of the development addresses overheating risk through the following measures:

- A glazing specification with a solar transmittance value which balances heat gain in summer whilst allowing good levels of internal daylight as well as enabling useful winter heat gain.
 - Where higher risk of overheating still exists, additional passive measures such as shading devices or external shutters may be considered.
 - A construction specification that includes high thermal mass materials, in order to smooth internal temperature profiles, absorbing heat during peak temperatures and releasing it at night.
 - All houses will benefit from cross-ventilation, enabling natural air pressure differentials across a building to purge unwanted heat build-up.
 - Significant green space around the development and between dwellings in order to reduce heat island effects and provide surfaces which reflect heat.
- 5.6. It is anticipated that due to these measures, no active cooling – with associated energy demand and CO₂ emissions – will be required.

6. Low Carbon and Renewable Energy Systems

- 6.1. The final stage of the energy hierarchy is to incorporate renewable energy systems.
- 6.2. The energy strategy of the development will ensure that the dwellings meet and exceed Part L standards through the first two stages of the energy hierarchy, and therefore it is assumed that no renewable energy systems will be required.
- 6.3. However a range of technologies have been assessed for potential incorporation into the scheme in accordance with Regulation 25A of the Building Regulations to review potentially appropriate systems that may be incorporated should there be any future requirement to do so, or the homeowner wishes to retrofit such systems at a future date.

Combined Heat and Power (CHP) and District Energy Networks

- 6.4. A CHP unit is capable of generating heat and electricity from a single fuel source. The electricity generated by the CHP unit is used to displace electricity that would otherwise be supplied from the national grid, with the heat generated as effectively a by-product utilised for space and water heating.
- 6.5. The economic and technical viability of a CHP system is largely reliant on a consistent demand for heat throughout the day to ensure that it operates for over 5000 hours per year. Heat demand from mainly residential schemes is not conducive to efficient system operation, with a defined heating season and intermittent daily profile, with peaks in the morning and the evening. For this reason, the use of a CHP system is considered unfeasible for this development.
- 6.6. There are currently no heat networks which extend near the proposed development. High network heat losses associated with distribution to individual houses, as opposed to large high-rise apartment blocks and commercial developments mean that a new heat network to serve the area is not considered viable or an environmentally preferred option. Due to these reasons, the provision for future connection to a district heating system is also not proposed.

Wind Power

- 6.7. Locating wind turbines adjacent to areas with buildings presents a number of potential obstacles to deployment. These include the area of land onsite required for effective operation, installation and maintenance access, environmental impact from noise and vibration, visual impact on landscape amenity and potential turbulence caused by adjacent obstacles, including the significant amount of woodland on and around the development.
- 6.8. A preliminary examination of the BERR wind speed database indicates that average wind speeds at 10m above ground level are around 5.0m/s³. Wind turbines at this site are therefore unlikely to generate sufficient quantities of electrical energy to be cost effective⁴. For these reasons wind power is not considered feasible.

Building Scale Systems

- 6.9. The remaining renewable or low carbon energy systems considered potentially feasible are at a building scale. These are as follows;
 - Individual biomass heating
 - Solar thermal
 - Solar photo-voltaic (PV)
 - Air Source Heat Pumps (ASHPs)
 - Ground Source Heat Pump (GSHPs)
- 6.10. The advantages and disadvantages of these technologies are evaluated in Table 3-7.

³ NOABL Wind Map (<http://www.rensmart.com/Weather/BERR>)

⁴ CIBSE TM38:2006. Renewable energy sources for buildings.

Table 3. Individual Biomass Heating feasibility appraisal

Potential Advantages	Risks & Disadvantages
<ul style="list-style-type: none"> • Potential to significantly reduce CO₂ emissions as the majority of space and water heating will be supplied by a renewable fuel • Decreased dependence on fossil fuel supply 	<ul style="list-style-type: none"> • A local fuel supply is required to avoid increased transport emissions • Fuel delivery, management and security of supply are critical • Space is required to store fuel, a thermal store and plant • A maintenance regime would be required even though modern systems are relatively low maintenance • Building users or a management company must be able to ensure fuel is supplied to the boiler as required. Local environmental impacts potentially include increased NO_x and particulate emissions
Conclusions	
<p>Biomass heating is considered technically feasible in large dwellings provided sufficient space can be accommodated for fuel supply, delivery and management. However air quality concerns combined with ensuring a genuinely sustainable fuel source means that these systems are not a preferred option.</p>	

Table 4. Solar Thermal systems feasibility appraisal

Potential Advantages	Risks & Disadvantages
<ul style="list-style-type: none"> • Mature and reliable technology offsetting the fuel required for heating water (typically gas) • Solar thermal systems require relatively low maintenance • Typically, ~50% of hot water demand in dwellings can be met annually 	<ul style="list-style-type: none"> • Installation is restricted to favourable orientations on an individual building basis • The benefit of installation is limited to the water heating demand of the building • Safe access must be considered for maintenance and service checks • Buildings need to be able to accommodate a large solar hot water cylinder • Distribution losses can be high if long runs of hot water pipes are required • Visual impact may be a concern in special landscape designations (e.g. AONB)
Conclusions	
<p>Solar thermal systems are considered technically feasible on all buildings with suitable roof orientations.</p>	

Table 5. Solar Photovoltaic systems feasibility appraisal

Potential Advantages	Risks & Disadvantages
<ul style="list-style-type: none"> • The technology offsets the high carbon content of grid supplied electricity used for lighting, pumps and fans, appliances and equipment • Mature and well proven technology that is relatively easily integrated into building fabric • Adaptable to future system expansion • Solar resource is not limited by energy loads of the dwelling as any excess generation can be transferred to the national grid • PV systems generally require very little maintenance • Occupiers could benefit from Feed in Tariff payments • Service and maintenance requirement minimal, and 2-3 storey buildings should not require significant additional safety measures (mansafe systems etc) for roof access 	<ul style="list-style-type: none"> • Poor design and installation can lead to lower than expected yields (e.g. from shaded locations) • Installation is restricted to favourable orientations • Feed in Tariff support mechanism has been discontinued • Safe access must be considered for maintenance and service checks • Visual impact may be a concern in special landscape designations (e.g. AONB) or conservation areas • Reflected light may be a concern in some locations
Conclusions	
<p>PV panels are considered technically feasible for all buildings with suitable roof orientations.</p>	

Table 6. Air Source Heat Pump systems feasibility appraisal

Potential Advantages	Risks & Disadvantages
<ul style="list-style-type: none"> • Heat pumps are relatively mature technology providing heat using the reverse vapor compression refrigeration cycle • Heat pumps are a highly efficient way of providing heat using electricity, with manufacturers reporting efficiencies from 250% • Can be of increased benefit where cooling is also required, therefore particularly relevant to commercial buildings 	<ul style="list-style-type: none"> • Air source heat pumps are powered by electricity, which is a significantly more expensive fuel than mains gas • It is critical that heat pump systems are designed and installed correctly to ensure efficient operation can be achieved. Users must be educated in how heat pump systems should be operated for optimal efficiency • Air source heat pump plant should be integrated into the building design to mitigate concerns regarding the visual impact of bolt-on technology • Noise in operation may be an issue particularly when operating at high output • A hot water cylinder would also be required, potentially introducing additional heat loss and energy wastage where the alternative is a gas combination boiler
Conclusions	
<p>Air source heat pumps are technically feasible for the buildings in this scheme. However, the potential increase in CO₂ emissions associated with their use in comparison to a gas baseline under current regulations means that they are not considered a preferred low carbon technology at this stage. The homeowner can however retrofit ASHP at later date.</p>	

Table 7. Ground Source Heat Pump systems feasibility appraisal

Potential Advantages	Risks & Disadvantages
<ul style="list-style-type: none"> Heat pumps are relatively mature technology providing heat using the reverse vapor compression refrigeration cycle Heat pumps are a highly efficient way of providing heat using electricity, with manufacturers reporting efficiencies from 320% Can be of increased benefit where cooling is also required, therefore particularly relevant to commercial buildings 	<ul style="list-style-type: none"> Ground source heat pumps are powered by electricity, which is a significantly more expensive fuel than mains gas It is critical that heat pump systems are designed and installed correctly to ensure efficient operation can be achieved Low temperature heating circuits (underfloor heating) would be required to maximise the efficiency of heat pumps Ground source heat pumps either require significant land to incorporate a horizontal looped system or significant expense to drill a bore hole for a vertical looped system A hot water cylinder would also be required, potentially introducing additional heat loss and energy wastage where the alternative is a gas combination boiler
Conclusions	
<p>Ground source heat pumps are considered technically feasible for buildings in this scheme. However, the cost and difficulty associated with vertical boreholes at this site means that they are not considered a viable or preferred low carbon technology at this stage.</p>	

Summary

- 6.11. Following this feasibility assessment, it is considered that roof-mounted systems would be most suited to the development:
- Solar thermal systems to dwellings that have space to incorporate a hot water cylinder and a suitable roof orientation.
 - Solar photovoltaic modules to dwellings that have suitable roof orientations.
- 6.12. Whilst it is considered that solar PV systems would be most applicable, as noted, the dwellings will achieve the required energy performance without requiring renewable energy systems, and therefore it is not proposed to install solar PV on the dwellings at this stage.
- 6.13. It is possible to for the homeowner to install PV panels in the future. The output will be depended on the roof pitch, orientation and possible overshadowing. Cost given by SAP 9.92 are £3,500-£5,500 with a declining return on offsetting carbon emissions. With the decarbonisation of the grid, the CO₂ emission factor is proposed to be reduced from 0.519 to 0.136 kgCO₂kWh in SAP 10.1. Therefore, the arrays would need to triple to achieve an equivalent reduction.
- 6.14. It is anticipated that Government grants will be available in the future to support the installation of LZC technologies for Zero Carbon Homes to be delivered by 2050. Delta Energy & Environment, commissioned by the Department of Business Energy and Industrial Strategy, estimated in 2018 that it will cost a home owner £8,750⁵ to install an 8kW heat pump, including buffer tank, cylinder and controls. This figure inflates to £14,750 if the home owner opts to install a new distribution network.

7. Indicative Dwelling Performance

- 7.1. Through following the strategy described, the dwellings will significantly reduce energy demand and consequent CO₂ emissions beyond a Part L compliant level of performance through the dwelling fabric alone.
- 7.2. SAP calculations have been undertaken to a sample of similar dwellings utilising the specification detailed in Chapter 4, in order to demonstrate the likely as-designed energy performance.

Table 8. Sample dwelling performance – Carbon Dioxide emissions

House type	Part L compliant emissions (kgCO ₂ /m ² /annum)	As-designed emissions (kgCO ₂ /m ² /annum)	Improvement %
1B Maisonette	19.39	18.32	5.52%
1B2P	20.00	19.44	2.80%
Baker	17.53	16.06	8.39%
Bungalow	19.37	18.56	4.18%
Cooper	19.1	18.27	4.35%
Ploughwright	17.38	16.76	3.57%
Quilter	19.66	19.15	2.59%
Scrivener	17.47	17.25	1.26%
Sculptor	17.96	17.14	4.57%
Silversmith	16.02	15.83	1.19%
Thespian	19.52	18.85	3.43%
Tillman	17.87	16.91	5.37%
Taylor	18.80	17.91	4.73%
Chandler	19.00	18.18	4.32%

- 7.3. This calculated performance demonstrates that the dwellings will exceed the requirements of Part L through the proposed specification as detailed in the previous section of this statement, without requiring low carbon or renewable energy systems to offset unnecessary emissions.

- 7.4. The Fabric Energy Efficiency (FEE) rating is an additional metric by which the improved performance of the dwellings as designed can be measured. Table 9 shows the Part L compliant Target Fabric Energy Efficiency (TFEE) and the as-designed calculated Dwelling Fabric Energy Efficiency (DFEE) of the same sample dwellings to demonstrate the improvements made.

Table 9. Sample dwelling performance – Fabric Energy Efficiency

House type	TFEE (kWh/m ² /year)	DFEE (kWh/m ² /year)	Improvement %
1B Maisonette	44.63	42.11	5.65%
1B2P	53.27	49.63	6.83%
Baker	45.41	39.08	13.94%
Bungalow	53.12	49.42	6.97%
Cooper	52.11	48.52	6.89%
Ploughwright	59.99	51.57	14.04%
Quilter	60.3	56.91	5.62%
Scrivener	58.3	50.51	13.36%
Sculptor	54.77	50.96	6.96%
Silversmith	55.03	48.53	11.81%
Thespian	60.44	54.32	10.13%
Tillman	51.31	47.24	7.93%
Taylor	52.88	47.46	10.25%
Chandler	58.66	53.3	9.14%

- 7.5. This demonstrates that the fabric energy efficiency of the specification proposed exceeds current Part L requirements by almost 10% across a range of different house types.

8. Water Conservation

- 8.1. This section is intended to show compliance with the Governments National Calculation Methodology for assessing water efficiency in new dwellings in support of Building Regulations Approved Document Part G.
- 8.2. Water efficiency measures including the use of efficient dual flush WCs, low flow showers and taps and appropriately sized baths will be encouraged with the aim to limit the use of water during the operation of the development to limit internal water use to a maximum of 125 litres/person/day.
- 8.3. Table 10 shows how the development could achieve a result less than the required 125 litres/person/day calculated in accordance with Building Regulations 17.K methodology. The calculation result for the Tailor house type in a total internal water consumption is 99.2 litres/person/day.

Table 10. Typical Water Demand Calculation (Tailor)

Installation Type	Unit of measure	Capacity/ flow rate	Litres/Person/Day
WC (dual flush)	Full flush (l)	6	8.76
	Part flush (l)	3	8.88
Taps (excluding kitchen taps)	flow rate (l/min)	3.67	7.37
Bath	Capacity to overflow (l)	160	17.60
Shower	Flow rate (l/min)	6	26.22
Kitchen sink taps	Flow rate (l/min)	6	13.00
Washing Machine	Litres/kg dry load	8.17	17.16
Dishwasher	Litres/place setting	1.25	4.50
Calculated Use			103.49
Normalisation Factor			0.91
Total Internal Consumption (L)			94.17
External Use			5.0
Building Regulations 17.K			99.20

9. Electric Vehicle Charging

- 9.1. It is recognised that there is a need to ensure that the development is adaptable to accommodate a future shift in personal transportation to electric vehicles, to promote sustainable transport and to minimise air pollution. As Electric Vehicle (EV) ownership increases, developers have an increasing responsibility to provide EV charging points for occupants.
- 9.2. Bellway Homes Ltd will be providing ducting and a suitable consumer unit to allow the later install of an electric vehicle charging point by the homeowner. This is in line with Suffolk County Councils Technical Guidance for Parking.
- 9.3. Further technical details of the charger along with locations will be provided at the appropriate time as preparation for the development progresses.

10. Conclusions

- 10.1. This Energy and Sustainability Statement has been prepared on behalf of Bellway Homes Ltd Essex in support of the reserved matters application for development of Old Norwich Road, Whitton.
- 10.2. Old Norwich Road, Whitton is currently under consideration under outline planning application ref 1832/17 (approved at appeal – ref. APP/W3520/W/18/3200941)) and Draft Schedule of Conditions (Ref. DC/20/03704) and comprises the construction of 190 residential dwellings across a mix of mix of one to four bedroom bungalows and houses.
- 10.3. The statement has been prepared to address national and local policy relating to sustainable design and construction of dwellings, including relevant policies within the Mid Suffolk District Core Strategy and Core Strategy Focused Review.
- 10.4. Draft planning Condition 6 is of principle relevance to sustainable construction strategies, and in accordance with national guidance require the homes to be constructed to meet Building Regulations standards with respect to energy and CO₂ performance, and also build in resilience to a changing future climate.
- 10.5. The statement demonstrates that the development will follow a fabric first approach to sustainable construction, and sets out a proposed construction specification which exceeds the minimum requirements of the current adopted version of Approved Document L1A 2013.
- 10.6. The homes will be fitted with highly efficient mains gas boilers. The models specified will have a Class 6 NO_x classification and are A rated Energy Efficiency Class. All heating designs of each house will allow for dual zone controls & programmable room thermostats.
- 10.7. Calculations undertaken to a range of similar house types demonstrates that the homes should deliver a circa 4.51% average improvement in CO₂ emissions and a 9.83% reduction in energy demand (Fabric Energy Efficiency – FFE's) through following this proposed approach.
- 10.8. Passive design measures and overheating risk mitigation has been considered, to ensure that design measures are incorporated which reduce overheating risk of the dwellings through the building fabric, siting and window design, together with natural ventilation strategies and delivering substantial green space within the development.
- 10.9. As the dwellings will meet the relevant energy requirements within the Building Regulations, as supported by planning policy, no renewable energy systems will therefore be incorporated into the dwellings at construction stage, however it is established that roof-mounted systems in the form of solar photovoltaics constitute the most appropriate systems to be retrofitted at a later date.

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Land West of Old Norwich Road, Whitton, Suffolk

Roads, Highways and Access - Technical Note Response to Deferral Comments at Committee

190680/J Waugh

Approved By: Keri Trimmer

01 February 2021

Version: 1.2

INTRODUCTION

At the planning committee meeting for Babergh and Mid Suffolk District Council on 20th January 2021, the committee deferred the decision, citing eight reasons for deferral.

This short report seeks to provide clarification and justification of the design in response to three of these items pertaining to the roads, access and highways that are listed below;

Pedestrian Connectivity

Site Access

Triple Parking

PEDESTRIAN CONNECTIVITY

The transport statement and design and access statement prepared and approved during the outline planning stage demonstrates connectivity to the surrounding locals areas for all transport uses, including sustainable transport via existing cycle routes, pedestrian connection to Old Norwich Road to the east and via public transport with bus stops in close proximity to the entrance.

Due to existing boundary constraints to the north, west and south, the only option for site permeability is to connect to Old Norwich Road to the east as described above, either via the proposed site access near or via the existing public right of way to the south east of the site. The landscaping and architectural layouts clearly display this.

For information we have attached the existing PROW layout to this report which shows the route of PROW 1 & 15 to the south of the site, which connect to the east to Bridleway 2. The onsite arrangement and landscape links to these paths which is more clearly shown on the permeability plan which is also included.

SITE ACCESS

This access point to the site has been reviewed throughout the design and planning process, taking the lead from and in collaboration with Suffolk County Council Highways to provide an optimal junction into the site considering the use and safety of all road users.

We have looked at three options for this access point to the satisfaction of Suffolk Highways, these are discussed and critiqued below to provide members with some background and reasoning as to why the mini roundabout is proposed for the site.

Option 1 – Outline Planning Design – Changed Priority Junction Arrangement

This option sought to provide access into the site by diverting the alignment of the existing Old Norwich Road to the west into the site and forming a priority junction with the secondary arm connecting to the north with the Old Norwich Road.

A layout showing this option is included at the end of this report for information.

On consultation with SCC Highways and transport assessors this option was disregarded for several reasons;

1. This would divert the primary route into the site which would create a cul-de-sac north of Whitton, which is not advisable.
2. Changing the alignment to give priority to road users entering the site would compromise the bus route that runs north and south along Old Norwich Road, requiring the bus to give way to other users in the north and south directions.
3. National Cycle Route 51 runs north and south along Old Norwich Road and cycle users would also be compromised when travelling in northbound potentially having to stop in the middle of the road to make the right turn to continue north on the cycle route, which is a safety concern.
4. The option was dismissed on grounds of safety with the main concerns being with users of sustainable transport.

Option 2 – Standard Major / Minor Priority Junction Arrangement

This option sought to provide access into the site by forming a typical major / minor priority junction arrangement off the existing alignment of Old Norwich Road with the minor road entering the site.

A layout showing this option is included at the end of this report for information.

On consultation with SCC Highways and transport assessors this option was also disregarded for several reasons;

1. Due to the bus gate small number of dwellings to the north of the site it is considered that traffic flows from the north of the major road would be very low which causes an imbalance of capacity between the major and minor road which is not advisable for this type of priority junction.
2. The concerns are that this could lead to complacency of road users exiting the site as they might assume that road users approaching from the south would be turning left into site or that no road users will be approaching from the north, both of which carries the risk of collision between road users.
3. The above carries the greatest risk for cyclists travelling north along Cycle Route 51 and pedestrians crossing the junction.

Option 3 – Mini Roundabout Junction Arrangement

This option sought to provide access into the site with a new mini roundabout arrangement with arms facing north and south along Norwich Road and west into the site.

A layout showing this option is included at the end of this report for information.

On consultation with SCC Highways this option was chosen as the optimal junction to provide access into the site;

1. The option provides a balanced priority across all arms of the junction, which is considered to be the safest option for all road users.
2. A Stage 1 Road Safety Audit, which is required for this stage of the highways access design, was undertaken to assess the safety of all road users for this option and submitted with planning documentation. Items raised within the audit are addressed and accepted by SCC Highways through the ongoing design.

3. SCC Highways requested this option and on pre-planning consultation with the area highways officer it is agreed that this option is to be included with the reserved matters planning application.
4. It has been discussed and agreed with SCC Highways that there are opportunities for additional signage to the eastern and southern arms of the roundabout highlighting the no through route for the bus gate to the north and SCC public transport team have been asked to look into the operation /enforcement of the bus gate.
5. We are also discussing the implementation of a bypass for cyclist travelling southbound with SCC Highways. This would take cyclist off the main carriageway and improve safety for cyclists.

All options have been discussed at length and the proposed approach to the site access agreed with SCC Highways, who will ultimately take ownership and future maintenance of the proposed highway.

TRIPLE PARKING

Triple parking is where a two parking bays are in front of a garage, with potential for three cars stacked one behind the other. The concern is that this would cause traffic issues with manoeuvring vehicles to allow cars in and out of parking bays, which could cause on street parking and restricted access.

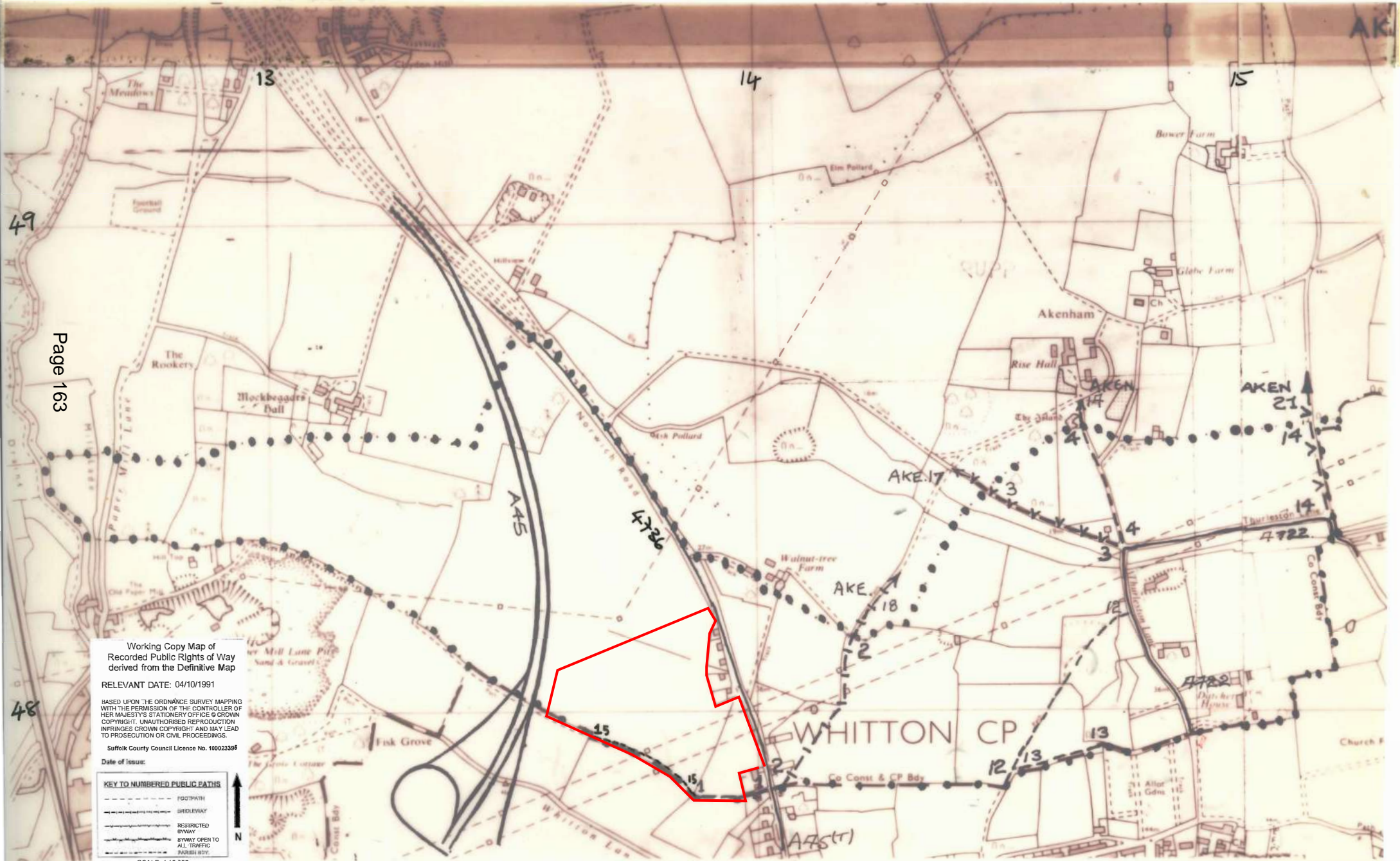
Local planning policy does not accept triple parking, however, it does state that it may be acceptable off private drives in some circumstances, provided no obstruction is caused to the road or to road users.

There were approximately 30 instances of this occurring on the layout submitted for reserved matters, the majority of which are located on private drives with a handful fronting onto the proposed highways.

Taking the concerns over triple parking into consideration the site layout is being reviewed and reconfigured, endeavouring to remove all instances of triple parking on the site, of the 30 included with the previous layouts one instance of triple parking remains.

WHITTON

560



Page 163

Working Copy Map of Recorded Public Rights of Way derived from the Definitive Map

RELEVANT DATE: 04/10/1991

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Date of issue:

KEY TO NUMBERED PUBLIC PATHS

- FOOTPATH
- BRIDLEWAY
- RESTRICTED BYWAY
- BYWAY OPEN TO ALL TRAFFIC
- PARISH BDY.

SCALE: 1:10,000

FPIS - DMMD Conf 16/7/2015.

Contractors are to check all levels and dimensions before work is put in hand, and any discrepancies are to be referred to the architects

REV	DATE	DESCRIPTION	DWN	CHKD
A	09.11.20	Amended inline with Site Masterplan 8859 / 03A	JE	-
B	30.11.20	Amended inline with Site Masterplan 8859 / 03B	JE	-
C	17.12.20	Amended inline with Site Masterplan 8859 / 03C	JE	-
D	29.1.21	Amended inline with Site Masterplan 8859 / 03D	JE	-



Key

- Primary Pedestrian Route
- Secondary Pedestrian Route
- Open Space Access
- Public Access
- Desire Lines
- National Cycle Route 51
- Internal Cycle Route (Road 1)
- Shared Surface Route
- Public ROW
- Bus Stop

Planning



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project

Old Norwich Road,
 Whitton,
 Ipswich

client

Bellway Homes Ltd (Essex)

drawing title

Permeability Plan

drawing number	revision
8859 / 30	D
checked	
scale 1:750 @ A1	drawn ARH
	date July 2019

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Page 164

OLD NORWICH ROAD, WHITTON, IPSWICH

A3

ORIGINAL PLOT SIZE

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NOTES:

1. Road geometries are subject to receipt of topographical data.

Rev	Date	Details	Drawn By	Checked By	Approved By

Bristol
 Cambridge
 London
 Oxford
 Welwyn Garden City



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 0117 925 9400
www.tpa.uk.com

CLIENT:
ASHFIELD LAND LTD

PROJECT:
**LAND AT NORWICH ROAD,
 IPSWICH**

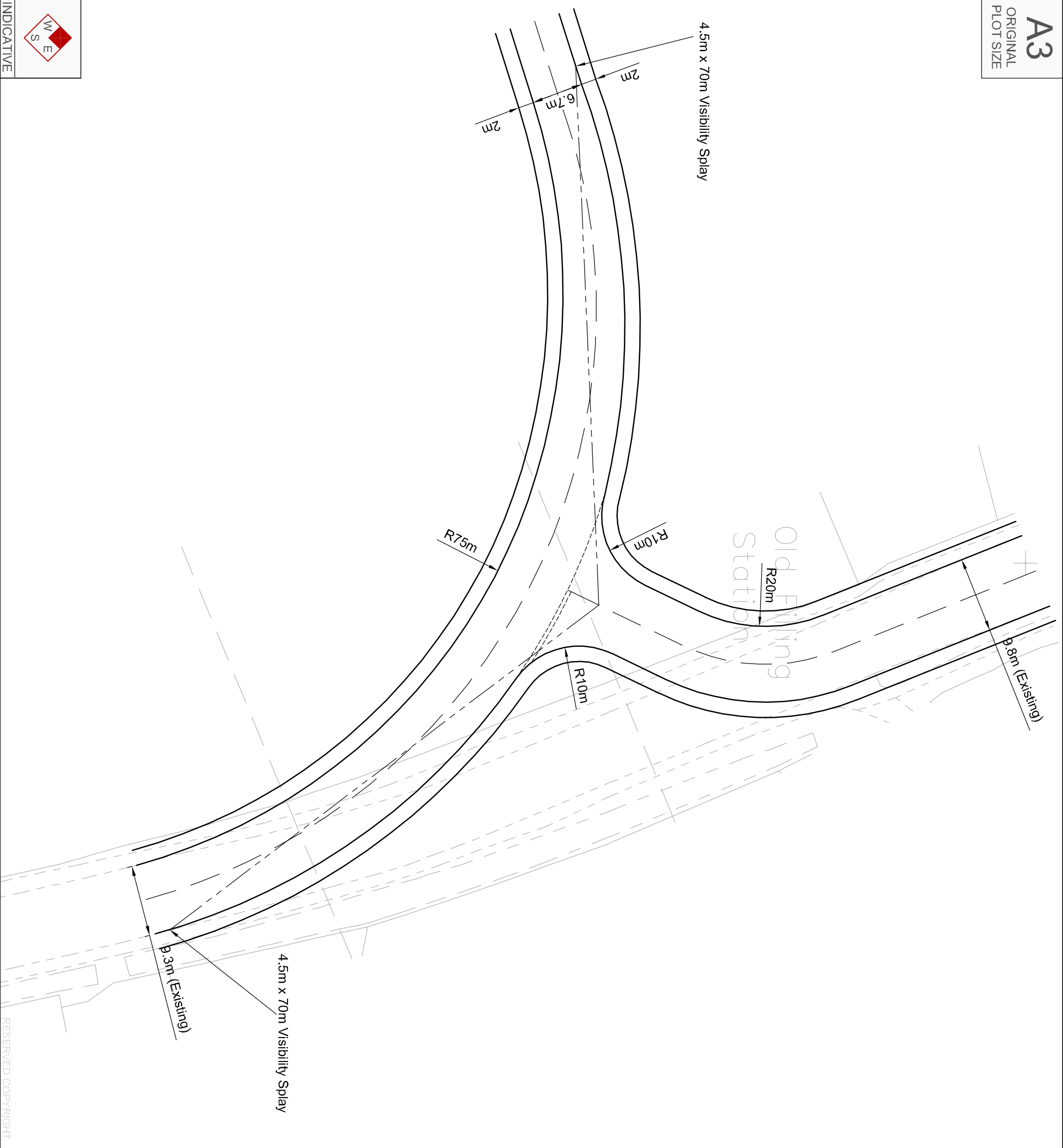
TITLE:
**Proposed Site Access
 Arrangement**

STATUS:
Illustrative

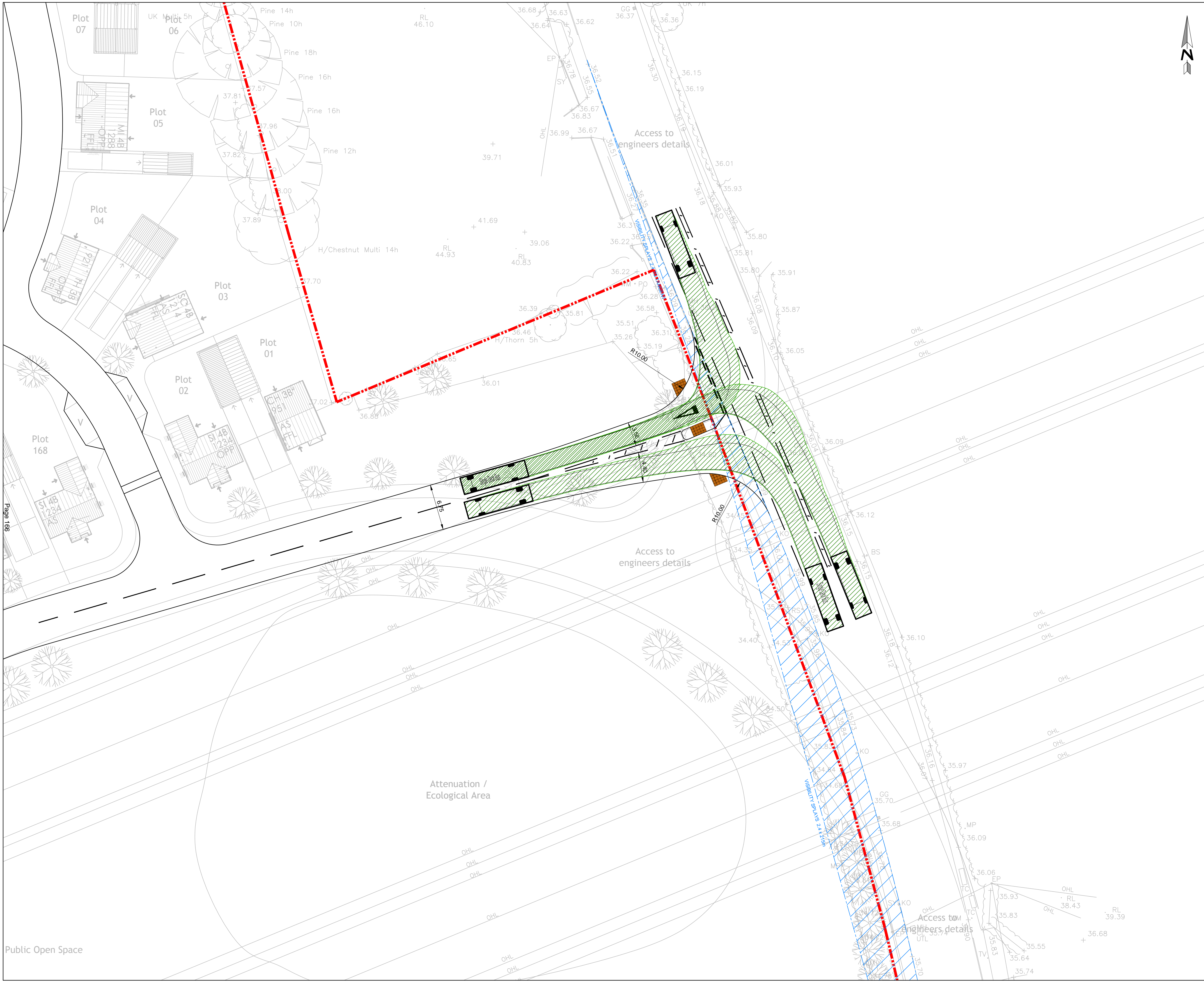
SCALE:	DATE:	DRAWN:	CHECKED:	APPROVED:
1:500	08.02.17	RNJ	KSS	MB
JOB NO.:	DRAWING NO.:	REVISION:		
1512-19	SK03			



INDICATIVE



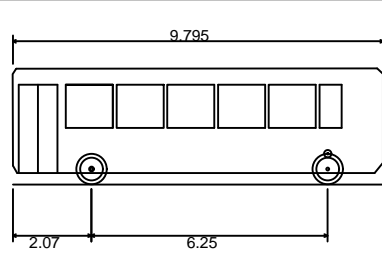
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- DO NOT SCALE FROM THIS DRAWING IN EITHER PAPER OR DIGITAL FORM. USE WRITTEN DIMENSIONS ONLY.

--- DEVELOPMENT BOUNDARY



Single Deck Bus	9.75m
Overall Length	2.50m
Overall Width	3.07m
Overall Body Height	0.306m
Min Body Ground Clearance	2.322m
Track Width	6.01s
Lock to lock time	10.111m
Kerb to Kerb Turning Radius	



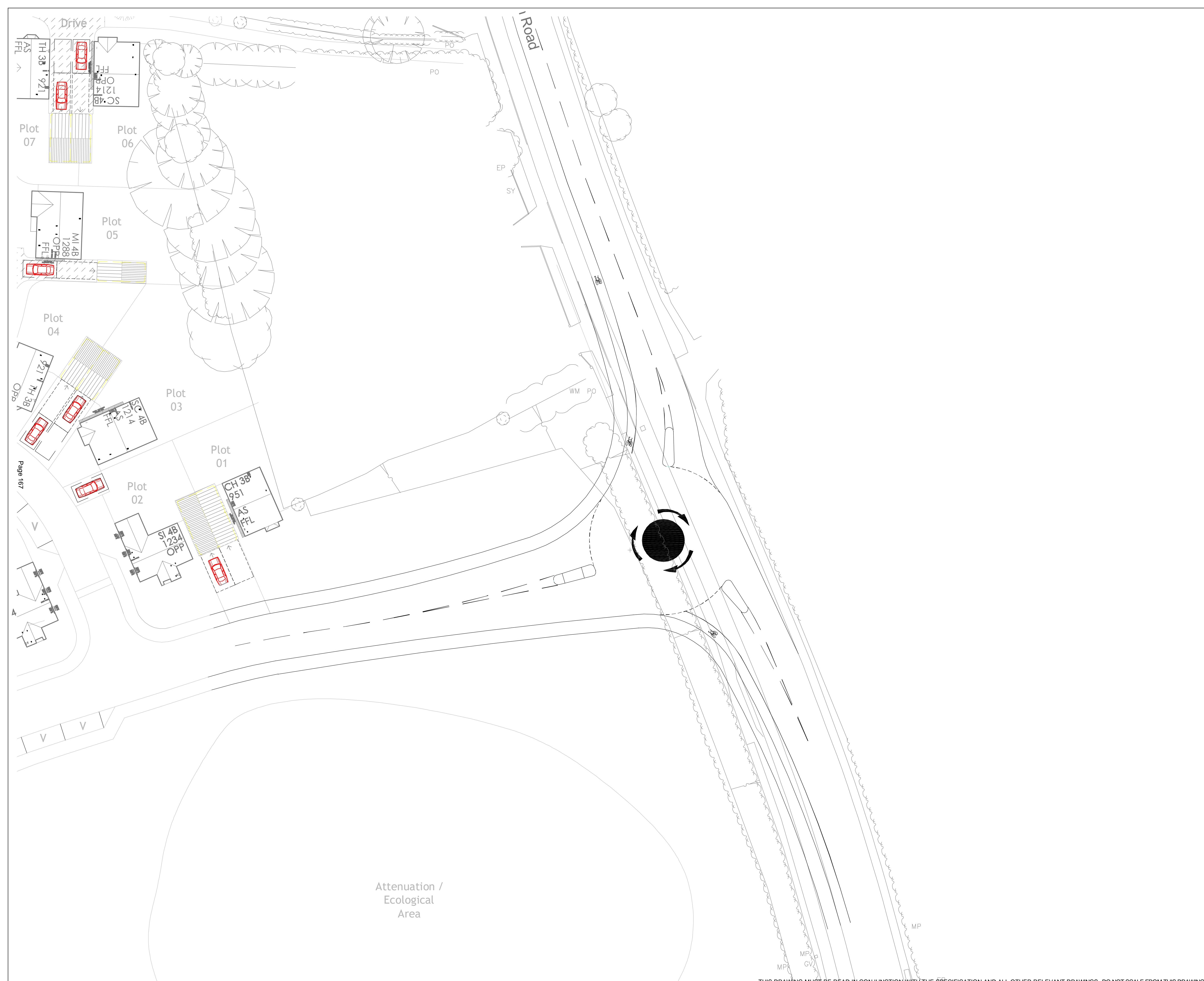
NOT FOR CONSTRUCTION

P1	09.10.19	PRELIMINARY ISSUE	MS	JW
Rev	Date	Description	Drawn	Check

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Drawing Status	
PRELIMINARY	
Project	Date
OLD NORWICH ROAD WHITTON, IPSWICH	OCT 2019
Scale	1:250@A1
Drawn	MS
Title	Engineer
ACCESS JUNCTION ARRANGEMENT - OPTION 5	JW
Drawing No	Project No
190680-CON-X-00-SK-005	190680
Revision	Revision
	P1



NOT FOR CONSTRUCTION

Rev	Date	Description	Drawn	Check

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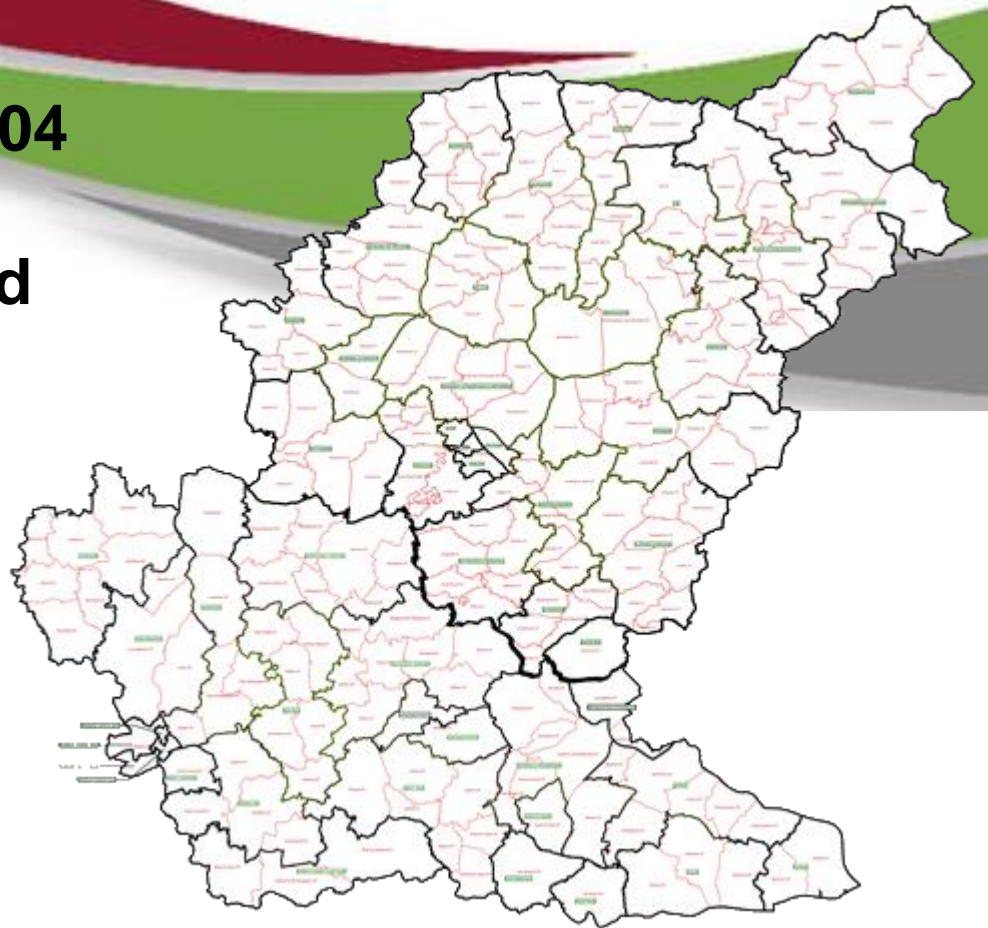
Drawing Status	Date	16 Oct '19
PRELIMINARY	Scale	1:250@A1
Project	Drawn	ABR
Old Norwich Road Whitton, Ipswich	Engineer	HLJ
	Project No	190680
Title	Client Project No	
Access junction Arrangement - option 4	Revision	
Drawing No		
190680-CON-X-00-SK-004		

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Application No: DC/20/03704

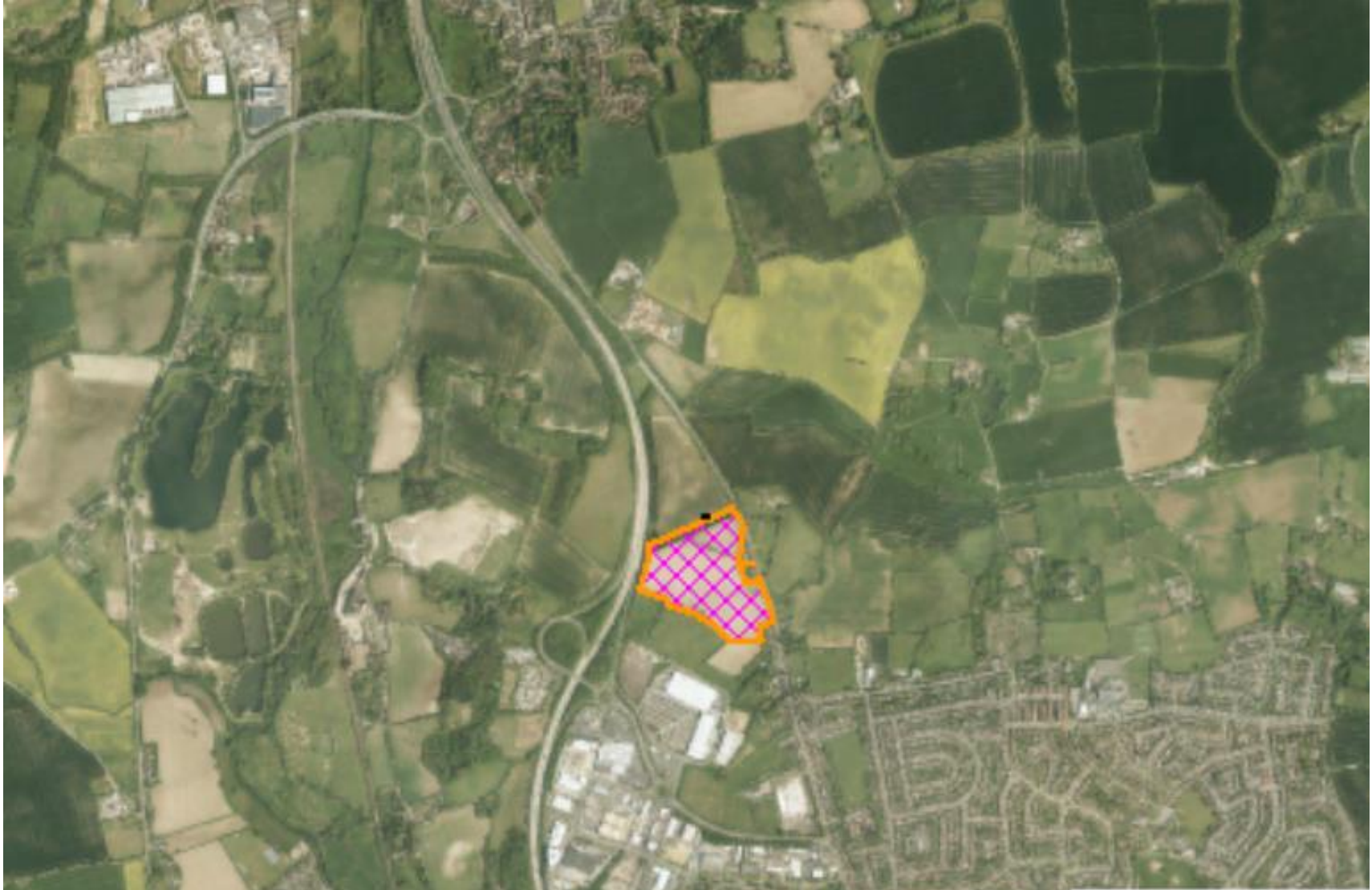
**Address: Land West Of Old
Norwich Road, Whitton**

Page 169



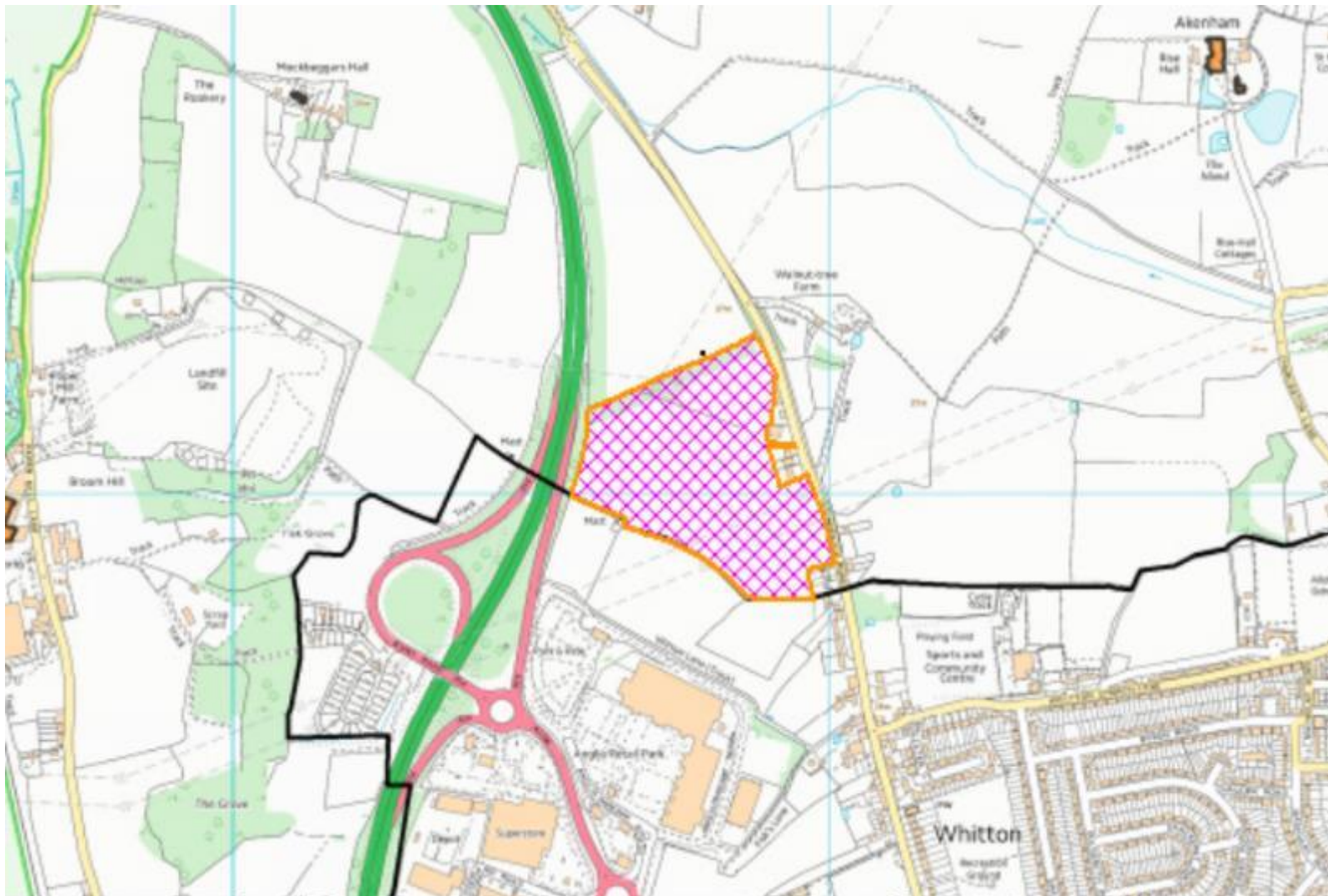
Aerial Map

Slide 2



Constraints Map

Listed Buildings  Grade II  District Boundary



Site Location Plan

Slide 4



Parameters Plan



Site Masterplan

Slide 6

Page 174



Construction work to check at 4 weeks and alterations after work to 10 weeks. All other discrepancies are to be referred to the architect.

Ref	Level	Description	Area
A	14.12	Highway scheme updated including new raised area drainage	AM
B	12.11.20	Highway scheme revised	AM
C	14.12.20	Highway scheme revised	PM
D	19.01.21	Highway scheme revised	AM

Old Norwich Road, Ipswich

Accommodation Schedule						
Proposals	No. of Apartments	Storey	SAF	No. of Units	Total Bed	% Workspace unit on site
PROVISED UNITS						
Garage	1	1	7153	2	1431	1.00
Garage	1	1	162	21	2482	30.52
Old Norwich	1	1	32	17	1857	2.31
Old Norwich	1	1	85	18	1718	2.15
Old Norwich	1	1	85	9	854	1.06
SUBTOTAL						
Bedrooms	4	1	1244	18	1244	1.56
Bathrooms	4	1	1244	14	1719	2.15
W.C./Toilets	4	1	1244	24	2482	30.52
SUBTOTAL				122	10819	13.24
TOTAL						
Garage	1	1	631	13	1465	18.42
Garage	1	1	1000	12	1212	15.28
Highgate Rd	1	1	1000	1	1026	12.81
Highgate Rd	1	1	149	4	1742	21.71
Highgate Rd	1	1	149	4	1742	21.71
Highgate Rd	1	1	149	4	1742	21.71
SUBTOTAL				27	16271	20.36
TOTAL				149	12446	15.60

Planning

L A P

LOCAL AUTHORITY PLANNING

Old Norwich Road, Whitton, Ipswich

Bellway Homes (Essex) Ltd

Site Masterplan

8859 / 03

D

Parking Plan

Slide 7

Page 175



- A 09.11.20 Amended inline with Site Masterplan 8859 / 03A JE
- B 30.11.20 Amended inline with Site Masterplan 8859 / 03B JE
- C 15.12.20 Amended inline with Site Masterplan 8859 / 03C PST
- D 28.01.20 Amended inline with Site Masterplan 8859 / 03D JWE

Key:

- Council approved Garage Space (86)
- Formal Visitor Parking Bay (35)
- General on plot parking bay (327)
- Electricity Sub-station parking space (1)
- Cycle Storage Location

NOTE:
All parking is in accordance with the Suffolk Vehicle parking Standards

TOTAL PARKING:
407 car parking spaces overall including visitor bays

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Old Norwich Road,
Whitton,
Ipswich

Bellway Homes Ltd (Essex)

Parking Strategy Plan

Drawing number 8859 / 21	Revision D
Date 1-26-20 01:41	Drawn JWB

Boundary Treatments Plan

Slide 8

Page 176



Contractors are to check all levels and dimensions before work is put to hand, and any discrepancies are to be referred to the architects

REV	Date	Description	Auth	Check
A	26.10.20	Updated to elevation dig. OIA	ABH	-
B	30.11.20	Amended in line with Site Masterplan 8859 / 25	JE	-
C	17.12.20	Amended in line with Site Masterplan 8859 / 25	JE	-

Line	Detail
1	1.5m Brick Boundary Wall
2	1.5m Close Boarded Fence
3	1.5m Close Boarded Acoustic Fence
4	1.5m Larch Lap Fence
5	1.5m Close Boarded Acoustic Fence

Refer to drawing 16-8859-26 for boundary treatment details.

Planning

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Project
 Old Norwich Road,
 Whitton,
 Ipswich

Client
 Bellway Homes Ltd (Essex)

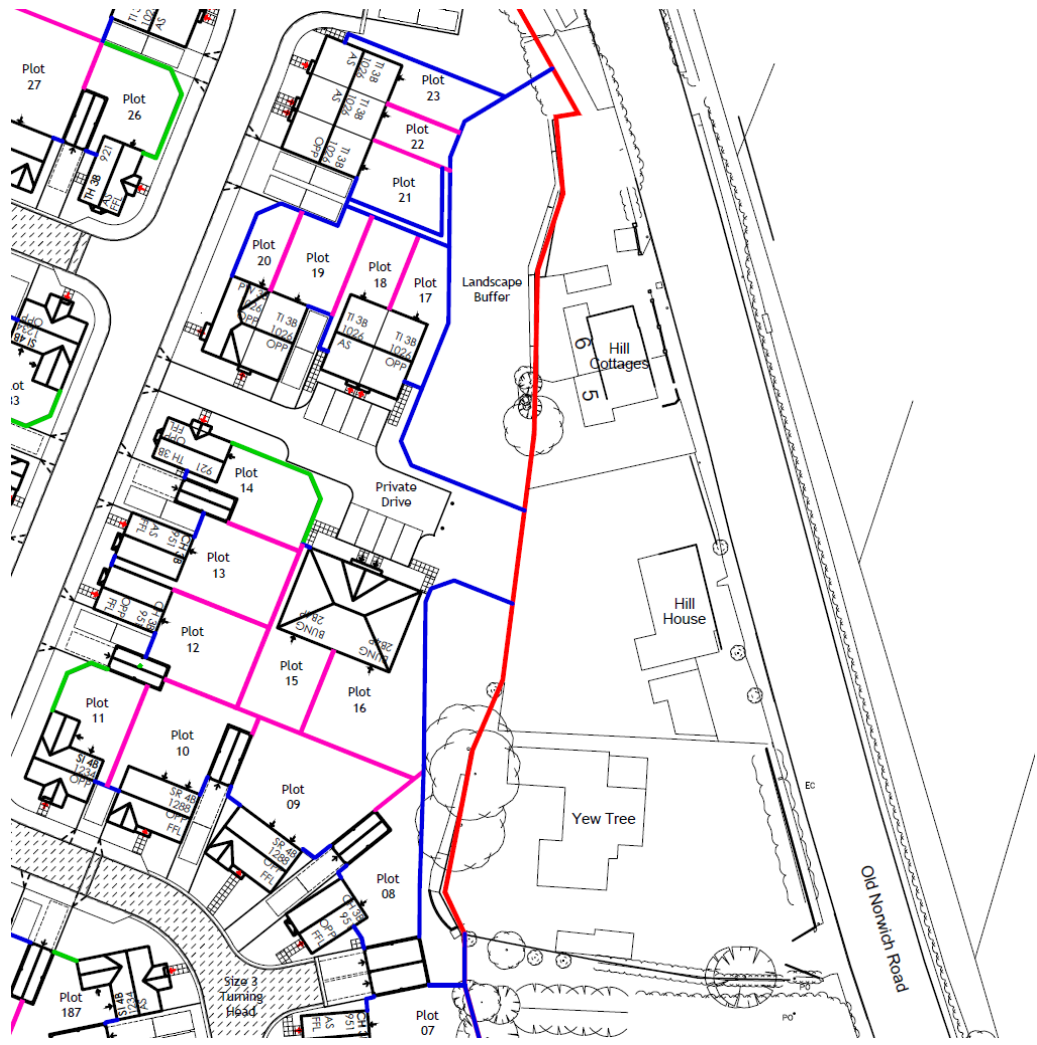
Boundary Treatments Plan

drawing number 8859 / 25	revision C
scale 1/750 @ A1	drawn ABH
	date July 2019

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Landscape Buffer



Sections AA/BB/CC



SECTION AA: LOOKING WEST TOWARDS PLOTS 1 & 2 & THE OLD FILLING STATION.

NOTES

LANDSCAPE BUFFER AREAS

The proposed landscape buffer areas between the landscape mitigation elements are to be planted areas which will not be susceptible to the public. The purpose of these landscape buffers is to provide a private planting gap between the proposed new houses and their gardens and the existing public footpath crossing the site boundary.

The walls and fences to the areas will be covered by close boarded fencing and garden gates. Management (including maintenance) will be the responsibility of the owners.

The two landscape buffer areas are to be seeded with a suitable grass seed and will be planted with trees and shrubs. The width of the landscape buffer areas will be planted with a dense border of either the tree species as set out in the site boundary. These areas will be managed to provide suitable planting in accordance with the Landscape & Ecological Management Plan (LEMP) Report (dated 18th January 2023) prepared by Matt Lee and signed by the relevant authority.

Specific Management Operations set out in detail within the LEMP are the responsibility of the Management Company include:

- Establish and care to maintenance of the proposed new grassland
- Establishment and care to maintenance of the proposed new trees
- Establishment and care to maintenance of the proposed new shrubs and hedges
- Care of existing trees and shrubs
- Any required repairs in relation to the grassland and any paths which are set within the landscape buffer areas

PROPOSED MANAGEMENT OPERATIONS

The area of public Open Space within the new development site will also be managed by the Management Company in accordance with the requirements of the LEMP Report.

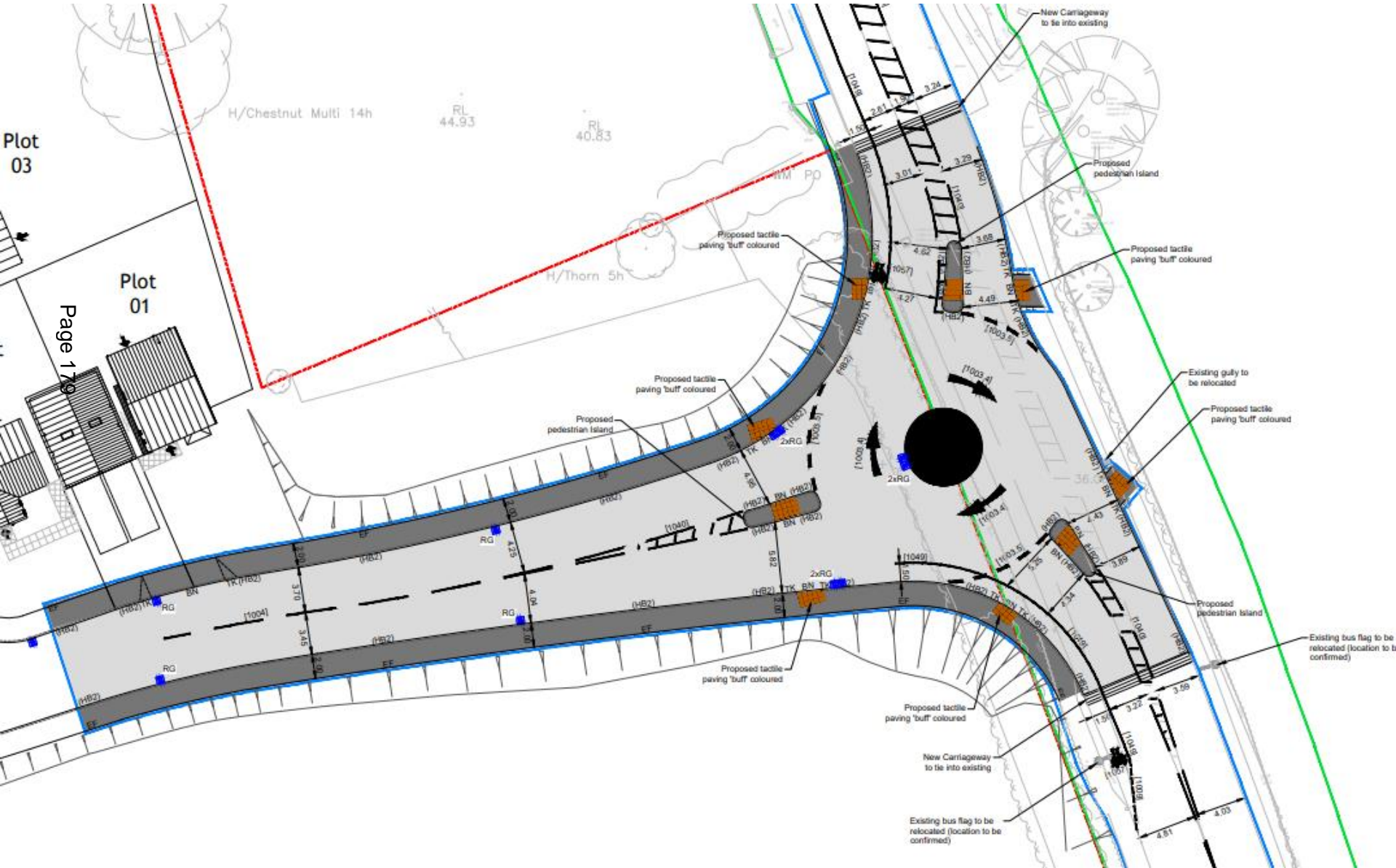


SECTION BB: LOOKING EAST TOWARDS HILL HOUSE & PLOTS 15 & 16



SECTION CC: LOOKING WEST TOWARDS PLOTS 18 & 17 & No6 OLD NORWICH ROAD.

Project: BELLWAY HOMES BELLEGLTD
Site: BELLEGLTD
Scale: 1:100
Date: 18/01/2023
Drawn by: M. Lee
Checked by: M. Lee
Scale: 1:100
Date: 18/01/2023



Permeability Plan

Page 180



Check all routes to check all links are permeable, following the route to the location and measure any to be added to the network.

Ref	Date	Comments	Del	Rev
1	23.11.22	Amendments to the Network PERM Plan	1	1
2	19.11.22	Amendments to the Network PERM Plan	1	2
3	17.11.22	Amendments to the Network PERM Plan	1	3
4	27.11.22	Amendments to the Network PERM Plan	1	4

- Key
- Primary Permeable Route
 - Secondary Permeable Route
 - Open Space Route
 - Cycle Route
 - Footpath
 - Shared Cycle Route
 - Shared Cycle Route
 - Shared Cycle Route
 - Shared Cycle Route
 - Shared Cycle Route
 - Shared Cycle Route
 - Shared Cycle Route

Planning



Old Norwich Road,
Whitton,
Ipswich

Bellway Homes Ltd (Essex)

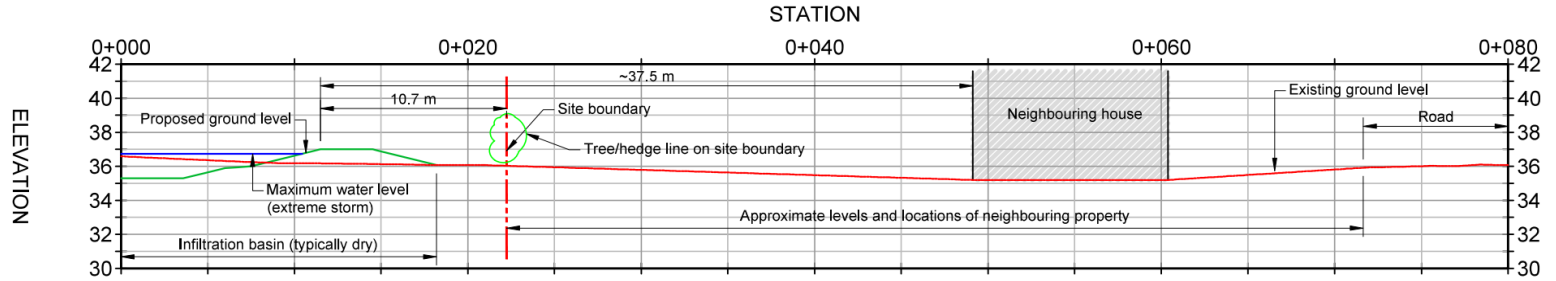
Permeability Plan

Ref	8859 / 30	Rev	D
Date	12.09.21	Del	1

Landscape Masterplan

Slide 13

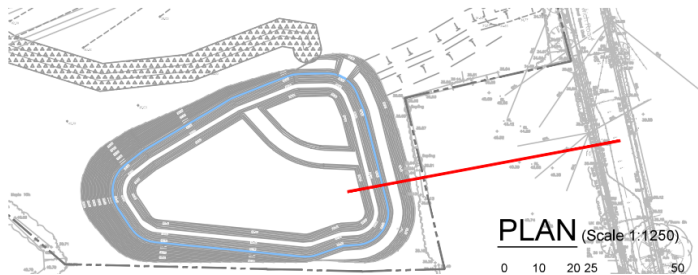




SECTION (Scale 1:250)



Page 182



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Project
**OLD NORWICH ROAD
WHITTON, IPSWICH**

Title
**SECTION THROUGH INFILTRATION
BASIN AND NEIGHBOURING PROPERTY**

NOT FOR CONSTRUCTION

P1 29.01.21 Issued for information		JC	JW
Rev	Date	Description	Drawn Check
Drawing Status		Project No	
PRELIMINARY		190680	
Date	Drawn	Drawing No	
JAN 2021	JC	SK-014	
Scale	Engineer	Revision	
1:250 @ A3	NW	D1	

Electric Vehicle Charging Plan

Page 183



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REV	DATE	DESCRIPTION	DRAWN	CHECKED
A	09.11.20	Amended scheme with Site Description B09 / 01A	JE	-
B	30.11.20	Amended scheme with Site Description B09 / 00B	JE	-
C	17.12.20	Amended scheme with Site Description B09 / 00C	JE	-

- ES:**
- Provision for an electric vehicle charging point to be made in all garages. This cable between the garage and garage consumer units to be sized to accommodate a three clamp car charging lead in addition to the normal capacity required for the garage power and lighting. The garage consumer unit is to have a space provided for the future connection of a car charger. A back box containing a minimum of 12" of lead up 70mm² clamp cable ducted and wired back to the garage will be provided for future connection by the home owner by specialist electric vehicle charging service provider. The back box is to be closed off with a suitable plate.
 - Flexible charging point ready for future floor standing EVCP. Location to have ducting run from consumer unit in proximity to car parking space finished with a water proof cap.
 - Flexible charging point ready for wall mounted EVCP. Location to have ducting run from consumer unit in proximity to edge of wall finished with a water proof cap.

Planning

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 E: info@lap-architects.co.uk
 www.lap-architects.com

client
**Old Norwich Road,
 Whitton,
 Ipswich**

date
Bellway Homes Ltd (Essex)

drawing title
Electric Vehicle Charging Plan

drawing number 8859 / 34	revision B
scale 1:750 @ A1	drawn by JE
	date 16.12.2020

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Affordable Housing Plan

Slide 16

Page 184



Contractors are to check all levels and dimensions before work is put in hand, and any discrepancies are to be referred to the architects

REV	DATE	DESCRIPTION	DWN	CHKD
A	09.11.20	Amended list to Site Hastington 8859 / 01A	JE	-
B	30.11.20	Amended list to Site Hastington 8859 / 01B	JE	-
C	11.12.20	Amended list to Site Hastington 8859 / 01C	PST	-

Key.

- Affordable Rent (45 no)
- Shared Ownership (22 no)

Planning



architects + interior designers limited
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www.lap-architects.com

project
**Old Norwich Road,
Whitton,
Ipswich**

client
Bellway Homes Ltd (Essex)

drawing title
Affordable Housing Plan

drawing number 8859 / 23	revision C
scale 1:750 @ A1	drawn / date JAB / Jun 2019

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Character Area Plan

Page 185

Key to character areas

Two distinct character area types will give the scheme overall legibility, interest and sense of place.

The Street

This character area comprises the main access routes through the site, and is defined by its relative formality and regeneration.

The dwellings will be faced in brick and there will be consistent roof and brick colours across several neighbouring units. Banding will be applied consistently to corner turning units at key locations.

Units will be positioned with some uniformity to setbacks, and will be oriented along the line of the road.

The ordered character will be reinforced by the use of hedgerows to delineate plot boundaries and help to screen parked cars.

The Rambles

Further into the site, the Rambles character areas are set around predominantly shared surfaces, private drives, curved footpaths and green spaces. Here, the built form becomes more diversified and less ordered.

In contrast with the Street character area, the material palette will feature roof and brick colours distributed in an assorted manner.

Plot setbacks will vary and some units will be angled to suit site specific conditions.

Indicative Materials

EXTERNAL WORKS

Tarmac to main routes and areas of movement within scheme drive to block paving.

Entrance Parking: Stone blocks square to path, kerbs, basins.

RAILWAY FENCE GOODS

Black UPVC

FASCIA & SOFFITS

White

WINDOWS & FRENCH DOORS

White UPVC

FACING BRICKS

Use of: - Ashbourne Red
- Roman Road
- Kensington Green

Matching bricks to be used in locations of corner building units to reinforce character as described in area specific.

ROOF TILES

Slate - Ridge tiles to match main tiles in all cases

Use of Red Tile / Grey Tile

Matching tiles to be used in locations of corner building units to reinforce character as described in area specific.

USATHERO-WORKING

Plans to have elements of craftsmanship to be used in locations of corner turning units to better describe an identified area - drawing B059 - 24 - Materials Plan

ALL TO BE READ IN CONJUNCTION WITH MATERIALS PLAN



Contractors are to check all levels and dimensions before work is set in hand, and any discrepancies are to be referred to the architects

REV	DATE	DESCRIPTION	DRN	CHKD
A	19.11.20	Amended info with Site Masterplan B059 / 024	JE	-
B	30.11.20	Amended info with Site Masterplan B059 / 028	JE	-
C	17.12.20	Amended info with Site Masterplan B059 / 030	JE	-

Planning



Old Norwich Road,
Whitton,
Ipswich

Bellway Homes Ltd (Essex)

Character Area Plan

drawing number	8859 / 31	revision	C
scale	1:750 @ A1	drawn	JE
		date	July 2020

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Street Scenes A to D



Street Scene A



Street Scene A Continued



Street Scene B



Street Scene C



Street Scene D

Contractors are to check all levels and dimensions before work is put in hand, and any discrepancies are to be referred to the architects.

REV	DATE	DESCRIPTION	DES	CHKD
A	03.11.20	Highway network updated Mailberry units replaced with Scolton Garage pitches changed Tresle parking concrete removed Cheriton road pitches altered	JC	JRH
B	30.11.20	Updated to site plan B059 - 03 B	JC	JRH
C	17.12.20	Updated to site plan B059 - 03 C	PST	JRH



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Planning



ASSOCIATES - Interior Designers Limited
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Old Norwich Road,
Whitton,
Ipswich

Bellway Homes Ltd (Essex)

Street Scenes (1-2)

Planning number 8859 / 10	Division C
Scale 1:200 @ A1	Drawn albr Date July 2019



Street Scenes E to G



Street Scene E



Street Scene F



Street Scene G

Contractors are to check all levels and dimensions before work is put in hand, and any discrepancies are to be referred to the architects

REV	DATE	DESCRIPTION	DATE	CHKD
A	03.11.20	Highway network updated Masonry units replaced with Scaffold Garage pit thro changed Trotter parking concrete removed Camber roof pitches altered	JWE	ARH
B	30.11.20	Updated to site plan 8859 - 03 B	JE	ARH
C	17.12.20	Updated to site plan 8859 - 03 C	PST	ARH



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Planning



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project:
 Old Norwich Road,
 Whitton,
 Ipswich

client:
 Bellway Homes Ltd (Essex)

drawing title:
 Street Scenes (2-2)

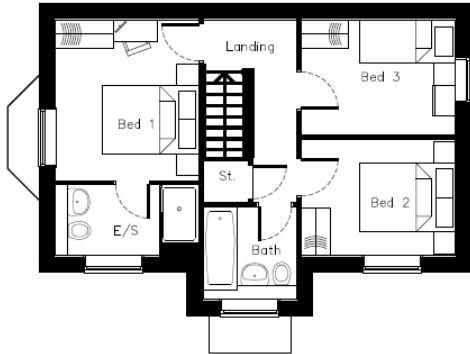
drawing number: 8859 / 11	revision: C
scale: 1:200 @ A1	drawn date: 16/12/20



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Plans and Elevations – Thespian - Brick

Slide 20



First Floor Plan

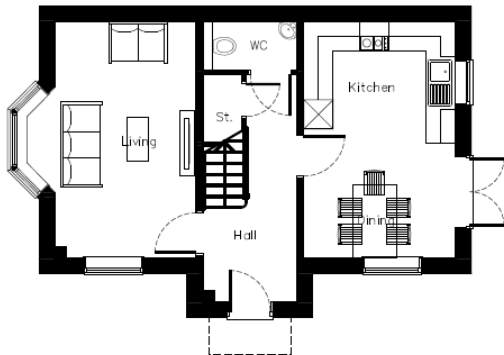


Front Elevation

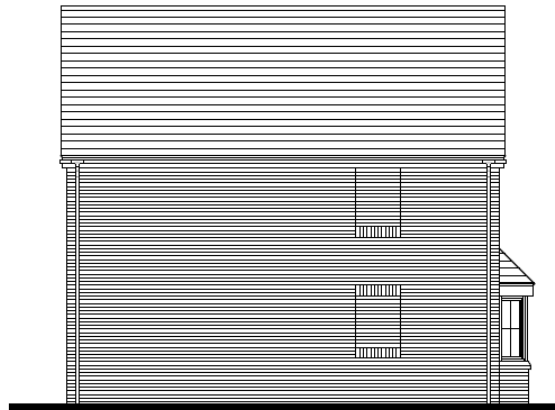


Side Elevation

PLOT NO.
AS: 94, 144
OPP: 51, 97, 128



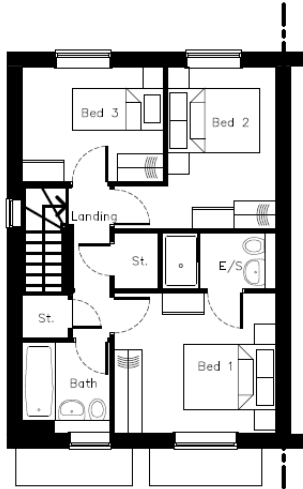
Ground Floor Plan



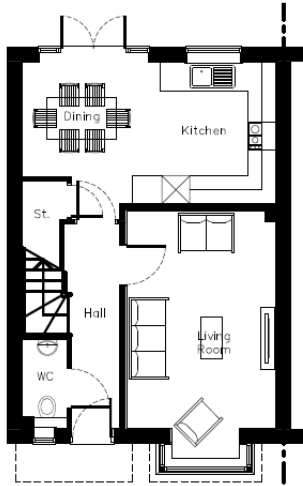
Rear Elevation



Side Elevation



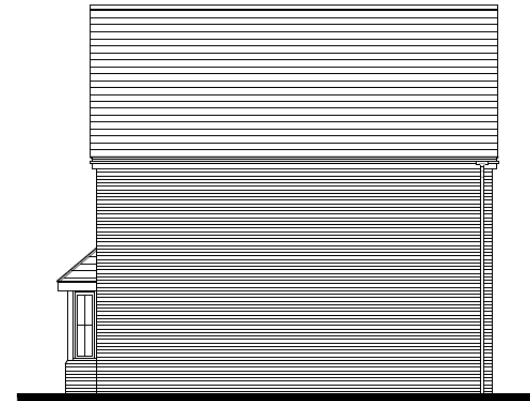
First Floor Plan



Ground Floor Plan



Front Elevation

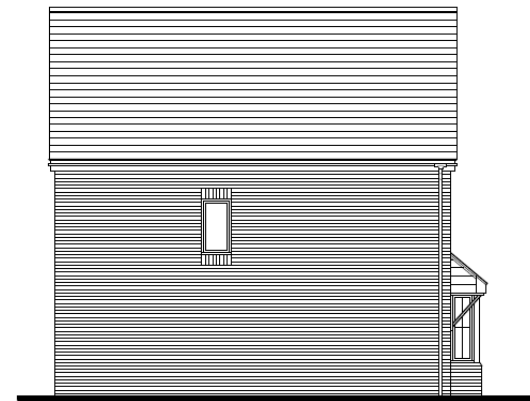


Side Elevation

PLOT NO.
AS: 07, 13, 31, 42, 43, 48, 107, 129, 177
OPP: 8, 12, 62, 64, 130, 143, 176

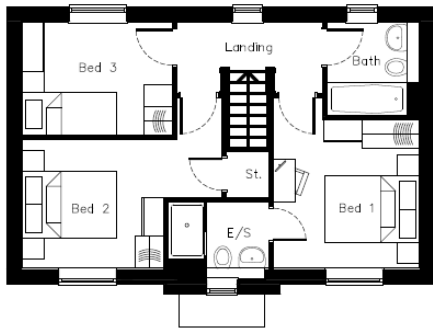


Rear Elevation



Side Elevation

Page 190

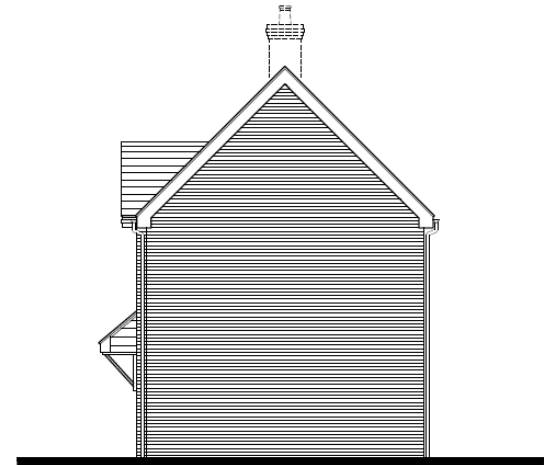


First Floor Plan



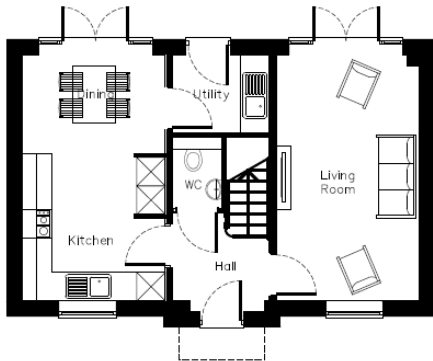
Front Elevation

PLOT NO.
AS: 63, 104, 142, 173, 185
OPP: 59, 99, 103, 174



Side Elevation

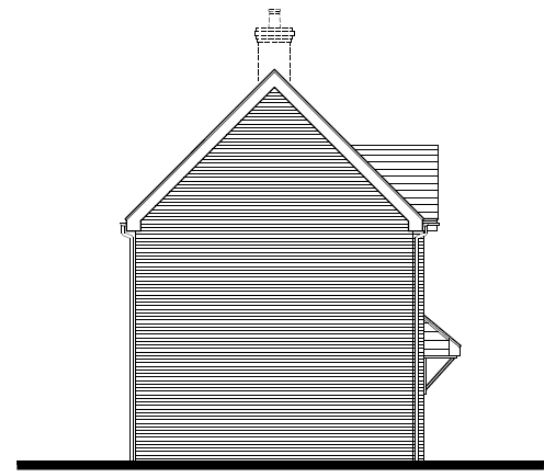
Please refer to chimney drawing for specific plot locations



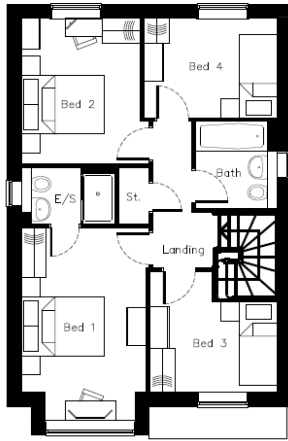
Ground Floor Plan



Rear Elevation



Side Elevation



First Floor Plan

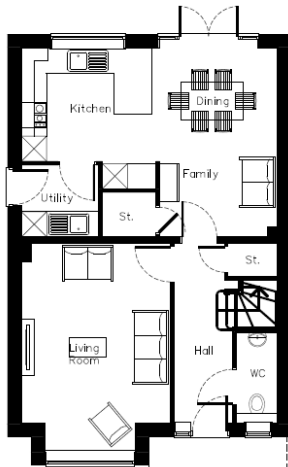


Front Elevation



Side Elevation

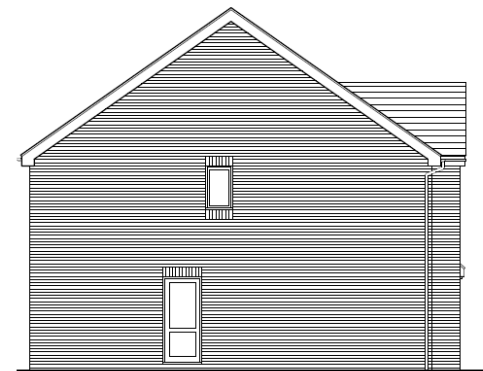
PLOT NO.
AS: 3, 6, 98, 135, 145
OPP: 32, 38, 53, 117, 136



Ground Floor Plan



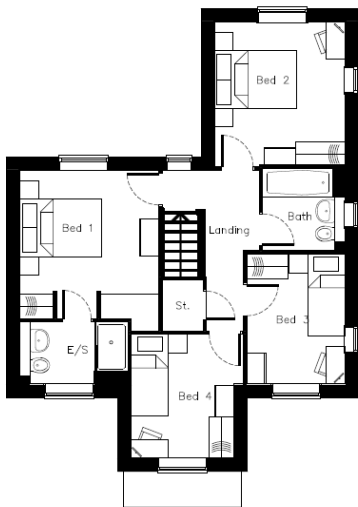
Rear Elevation



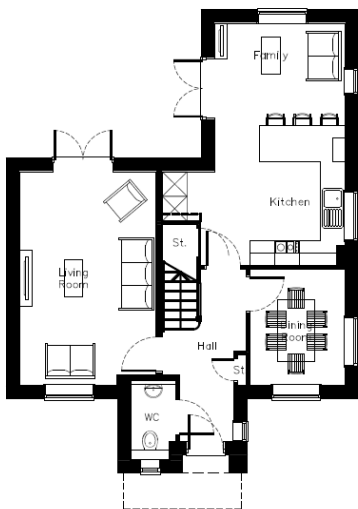
Side Elevation



Scale in metres



First Floor Plan



Ground Floor Plan



Front Elevation



Side Elevation

PLOT NO.
AS: 110, 131, 138, 184, 187
OPP: 33, 40, 139, 175, 190

Please refer to chimney drawing for specific plot locations



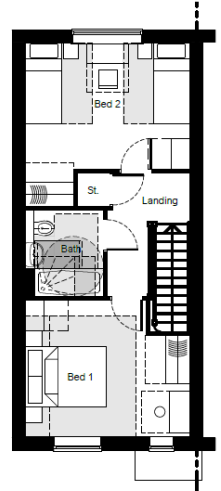
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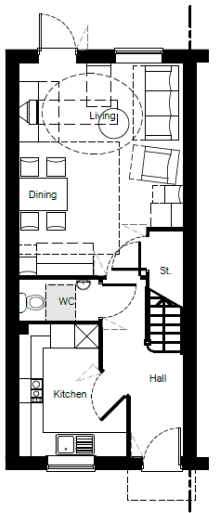
Side Elevation



Scale in metres



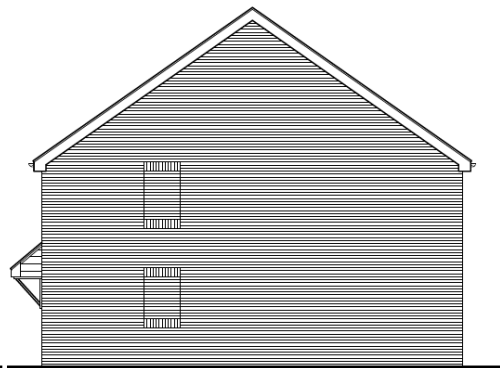
First Floor Plan



Ground Floor Plan



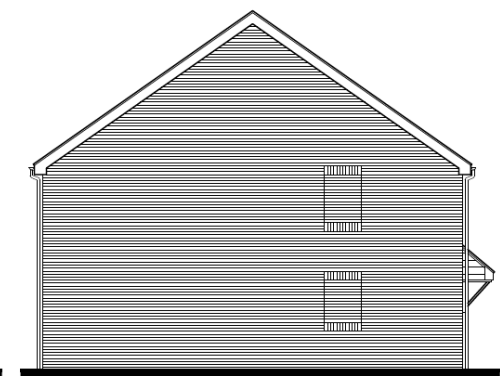
FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION

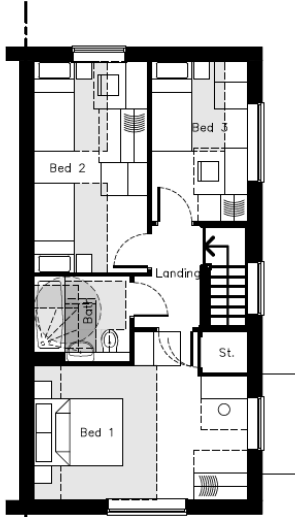


SIDE ELEVATION



Scale in metres
1:100

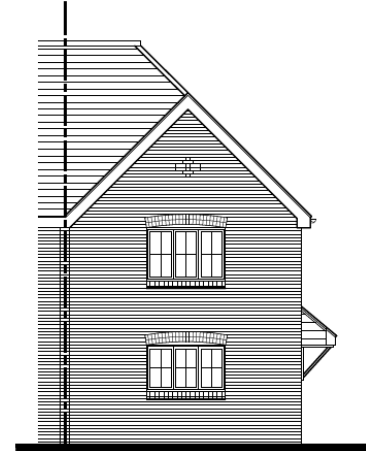
Page 194



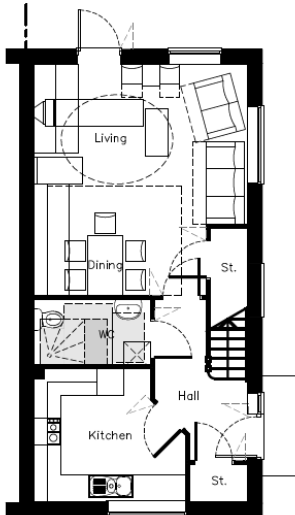
First Floor Plan



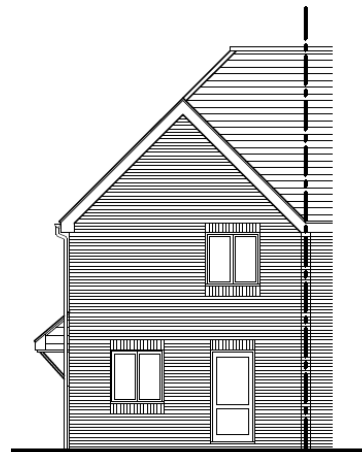
FRONT ELEVATION



SIDE ELEVATION

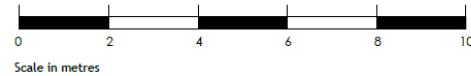


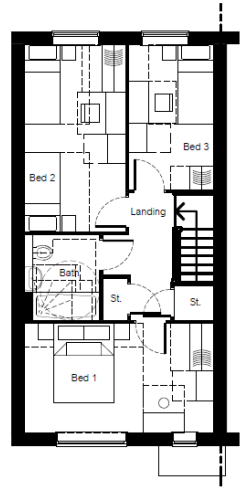
Ground Floor Plan



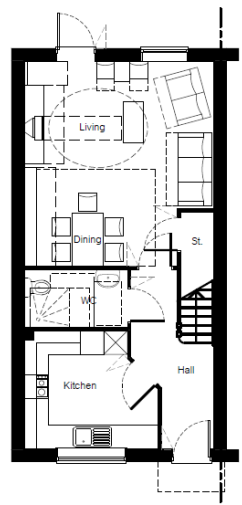
SIDE ELEVATION

PLOT NO.
OPP: 20





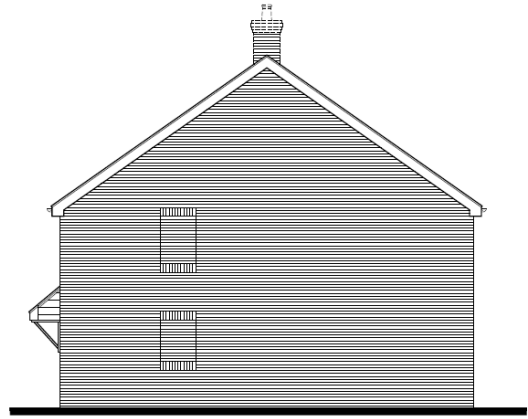
First Floor Plan



Ground Floor Plan



FRONT ELEVATION



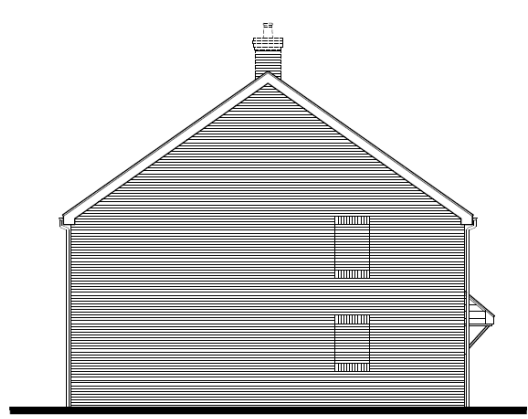
SIDE ELEVATION

PLOT NO.
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OPP: 17, 19, 21, 24, 73, 108

Please refer to chimney drawing for specific plot locations



REAR ELEVATION

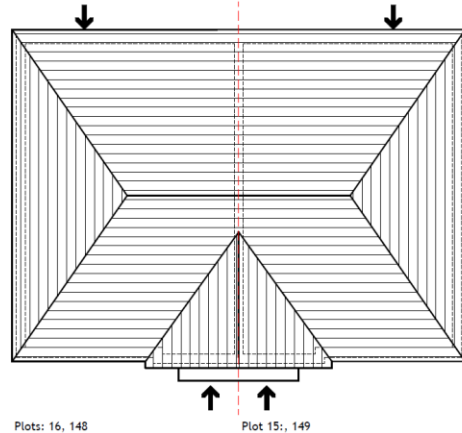
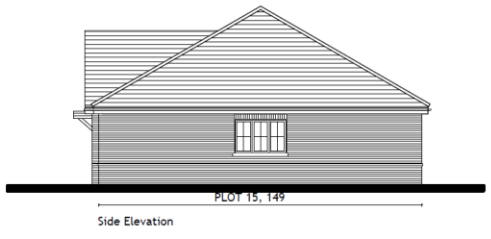
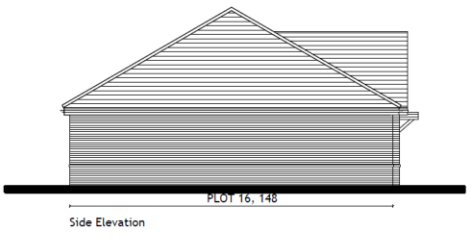
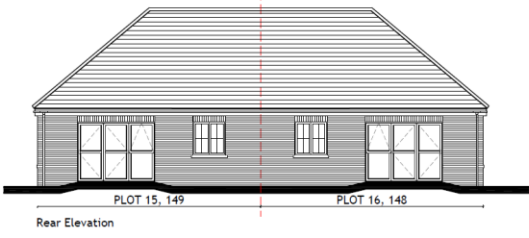
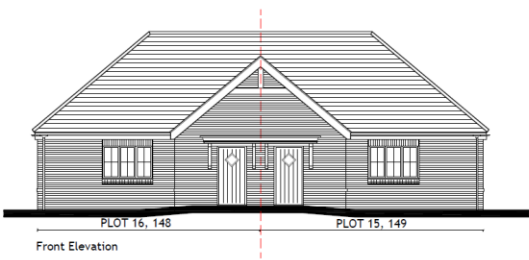


SIDE ELEVATION



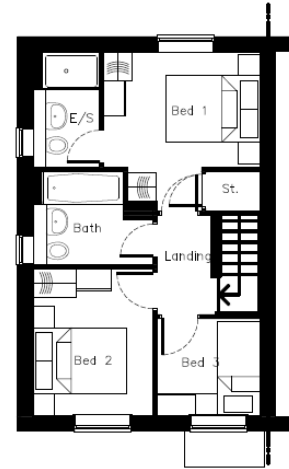
Scale in metres
1:100

Floor Plans and Elevations - Bungalow

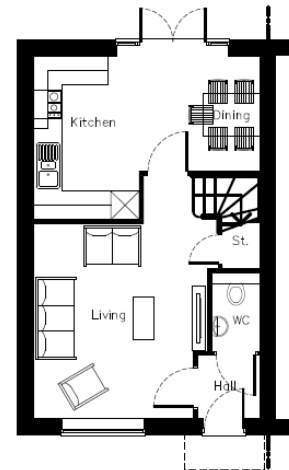


Side omit 149

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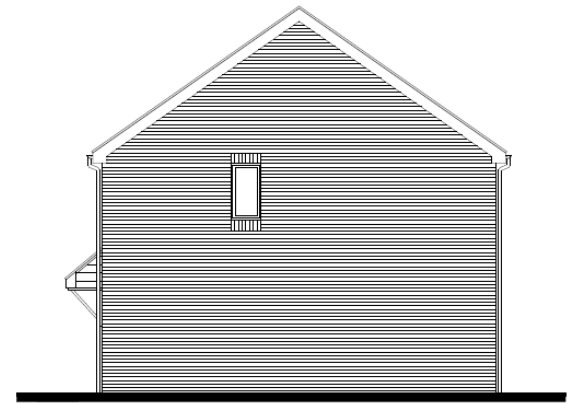
First Floor Plan



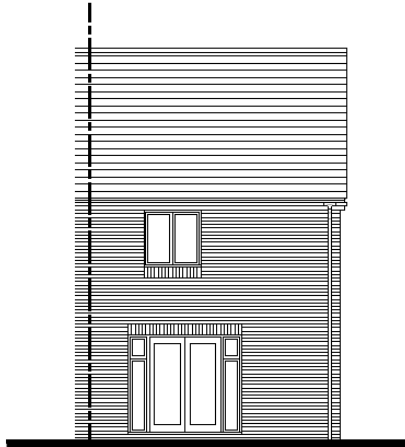
Ground Floor Plan



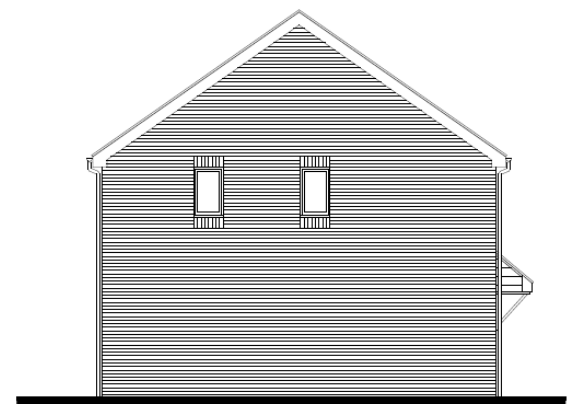
Front Elevation



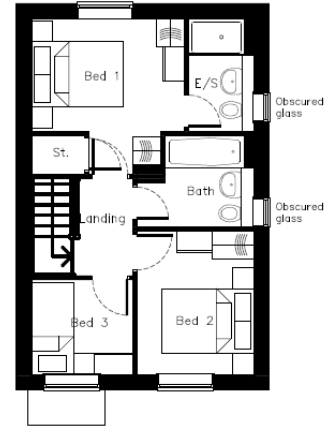
Side Elevation



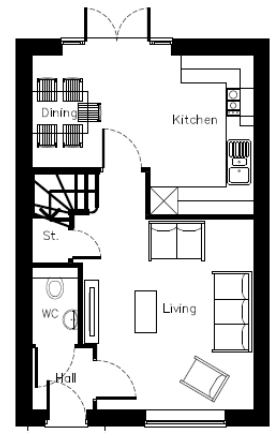
Rear Elevation



Side Elevation



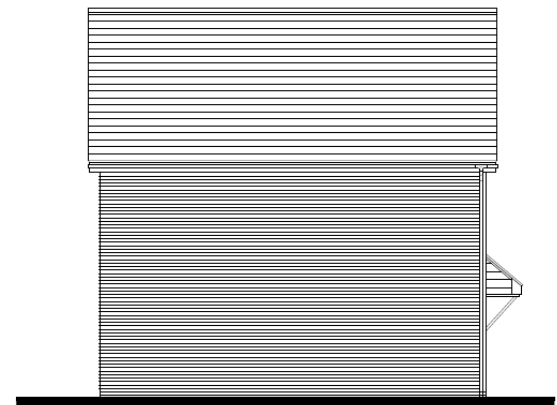
First Floor Plan



Ground Floor Plan



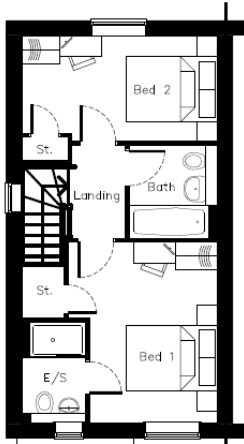
Front Elevation



Side Elevation



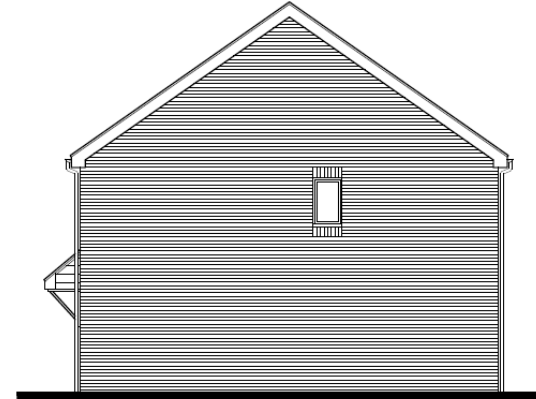
Rear Elevation



First Floor Plan

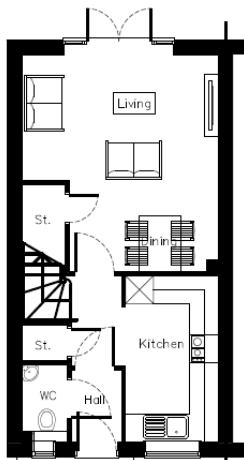


Front Elevation



Side Elevation

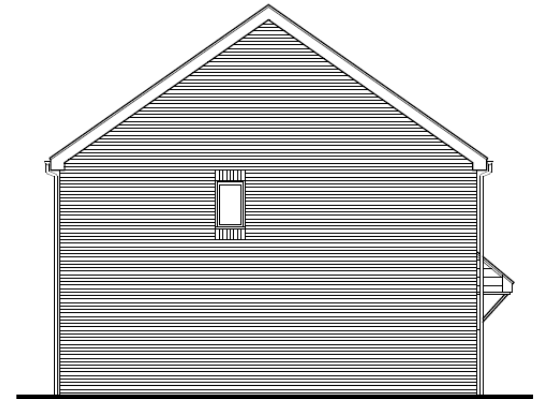
End Terrace Plots
AS: 77
OPP: 76



Ground Floor Plan

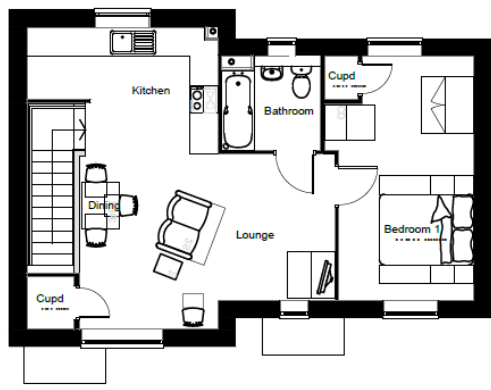


Rear Elevation



Side Elevation

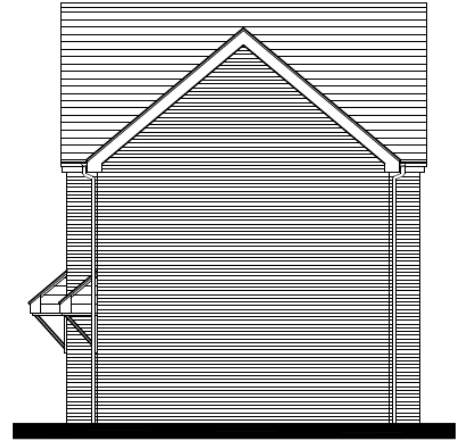
Page 200



First Floor Plan

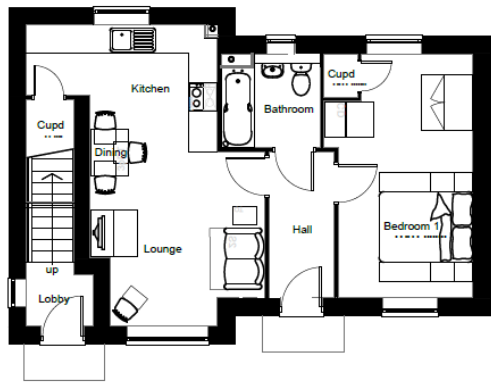


Front Elevation



Side Elevation

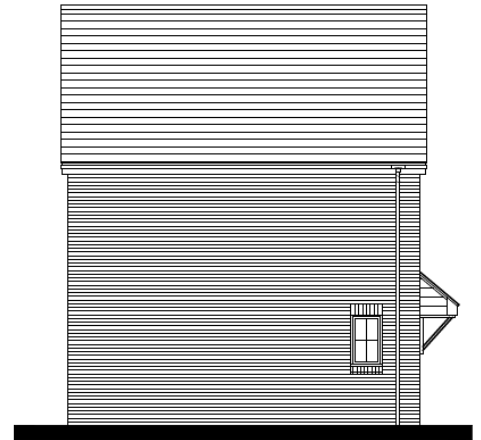
PLOT NO.
91, 92, 154, 155, 159, 160, 161, 162



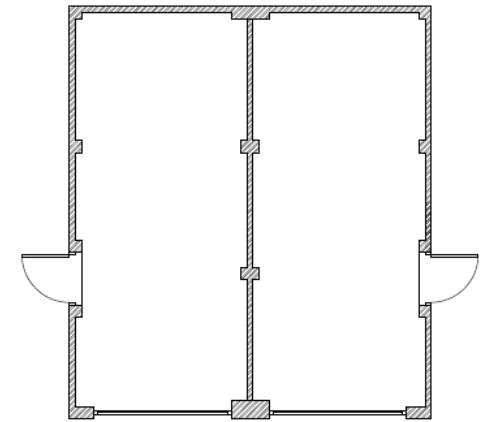
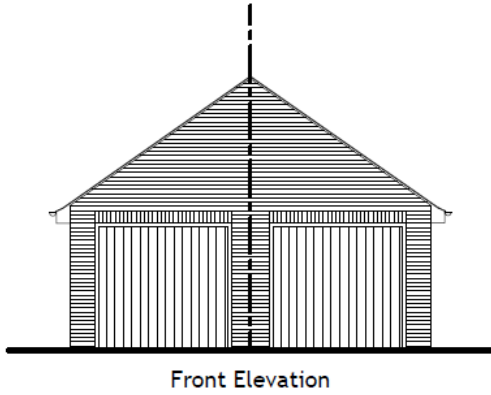
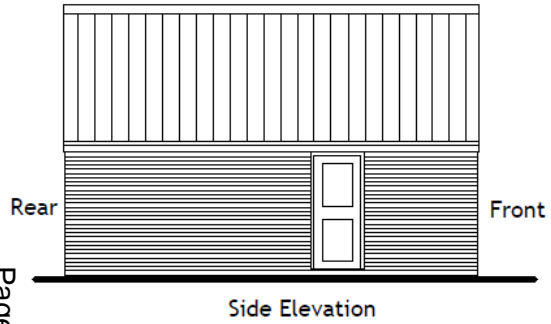
Ground Floor Plan



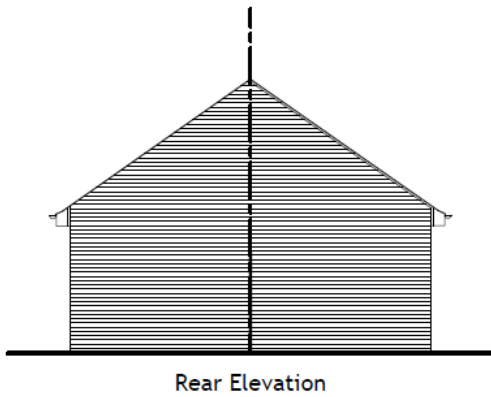
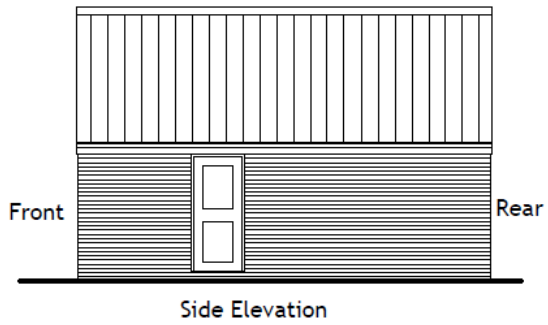
Rear Elevation



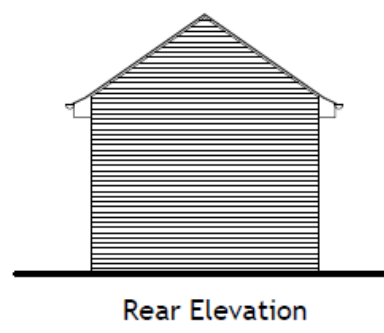
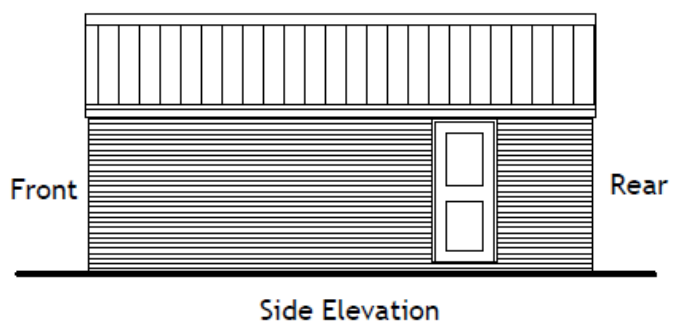
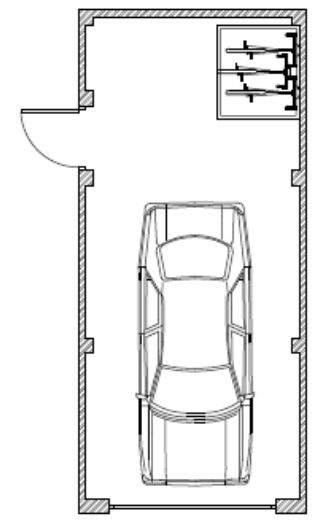
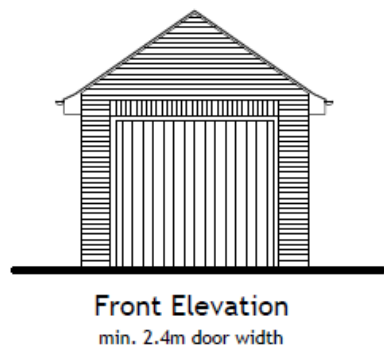
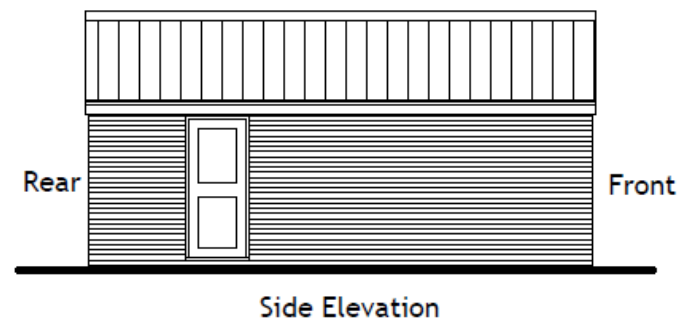
Side Elevation



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Page 202



Agenda Item 7b

Committee Report

Item 7B

Reference: DC/20/05046

Case Officer: Jasmine Whyard

Ward: Needham Market.

Ward Member/s: Cllr Stephen Phillips. Cllr Mike Norris.

RECOMMENDATION – REFUSE PLANNING PERMISSION

Description of Development

Application for Outline Planning Permission (some matters reserved, access to be considered).
Town and Country Planning Act 1990. - Erection of 279 No. dwellings (including 100 affordable dwellings) and access.

Location

Land on The North West Side Of, Barking Road, Needham Market, Suffolk

Expiry Date: 26/02/2021

Application Type: OUT - Outline Planning Application

Development Type: Major Large Scale - Dwellings

Applicant: Mr David Willis, Mrs Marlene Perry And Mr Michael Watson

Agent: Mr Jason Parker

Parish: Needham Market

Site Area: 16.48 hectares

Density of Development:

Gross Density (Total Site): 16.9 dwellings per hectare

Details of Previous Committee / Resolutions and any member site visit: None

Has a Committee Call In request been received from a Council Member (Appendix 1): No

Has the application been subject to Pre-Application Advice: No

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

- i. The development exceeds the threshold for being determined under delegated authority owing to the fact that the development is 'a residential development for 15 or more dwellings' as per Mid Suffolk's Scheme of Delegation.
-
-

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

The Development Plan

The following policies are considered the most important to the determination of this proposal. The policies are all contained within the adopted development plan for Mid Suffolk District which for the purposes of determining this application is comprised of: Mid Suffolk Core Strategy Focused Review (2012), Mid Suffolk Core Strategy (2008), Mid Suffolk Local Plan (1998), specifically the live list of 'saved policies' (2016) and Suffolk Minerals and Waste Local Plan (2020). All policies, save for CS1, CS2 and H7, are afforded full weight in the determination process as they are considered wholly consistent with the aims of the NPPF under paragraph 213 of that document. This will be explained further, later in this report.

- Mid Suffolk Core Strategy Focused Review (2012)
 - FC1- Presumption in Favour of Sustainable Development
 - FC1.1- Mid Suffolk Approach to Delivering Sustainable Development

- Mid Suffolk Core Strategy (2008)
 - CS1- Settlement Hierarchy
 - CS2- Development in the Countryside & Countryside Villages
 - CS4- Adapting to Climate Change
 - CS5- Mid Suffolk's Environment
 - CS6- Services and Infrastructure

- Mid Suffolk Local Plan (1998)
 - GP1- Design and layout of development
 - H7- Restricting housing development unrelated to needs of countryside
 - H13- Design and layout of housing development
 - H15- Development to reflect local characteristics
 - H17- Keeping residential development away from pollution
 - CL2- Development within special landscape areas
 - CL8- Protecting wildlife habitats
 - CL11- Retaining high quality agricultural land
 - T10- Highway considerations in development
 - T11- Facilities for pedestrians and cyclists
 - T12- Designing for people with disabilities
 - RT12- Footpaths and Bridleways

- Suffolk Minerals and Waste Local Plan (2020)

MP10- Minerals Consultation and Safeguarding Area

Emerging Joint Local Plan Policies

The emerging Joint Local Plan is currently at Regulation 19 Pre-submission and has not yet been submitted for examination, thus the plan currently has limited weight in the decision-making process. However, it is noteworthy that the application site does not form a proposed allocation within that document i.e., it is anticipated that the needs of the district can be met over the next plan period without the development proposed.

The National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2019 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-taking purposes.

Particularly relevant elements of the NPPF include:

- Chapter 2: Achieving Sustainable Development
- Chapter 9: Promoting Sustainable Transport
- Chapter 12: Achieving Well-Designed Places
- Chapter 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Chapter 15: Conserving and Enhancing the Natural Environment
- Chapter 17: Facilitating the Sustainable Use of Minerals

Other Considerations

- Suffolk County Council- Suffolk's Guidance for Parking (2014 most recently updated in 2019)
- Suffolk Local Transport Plan (2011-2031)

The National Planning Practice Guidance (NPPG) provides guidance and advice on procedure rather than explicit policy; however, it has been taken into account in reaching the recommendation made on this application.

Neighbourhood Plan Status

This application site is within a Neighbourhood Plan Area.

The Neighbourhood Plan is currently at:-

Regulation 16, which is stage 3 of the process, is focused on the pre-submission publicity and consultation of the plan. The plan will have to progress through another four stages before it can be formally adopted as part of the development plan. Accordingly, at this stage the Neighbourhood Plan has

no determinative weight, but it is again noteworthy that the site is not proposed for development and certainly not in the manner applied for under this application.

Consultations and Representations

During the course of the application Consultation and Representations from third parties have been received. These are summarised below, but Members are directed to consider all responses in full-

A: Summary of Consultations

Town/Parish Council (Appendix 3)

- **Needham Market Town Council**

Object. The following issues were raised: insufficient consultation, previous refusal on site, outside of the settlement boundary, contrary to existing and emerging policy as it is within the countryside, the Council has a 5-year housing land supply, impact on highway network, impact on infrastructure, not well connected to the town, inadequate access through a flood zone, increasing flood risk elsewhere, unclear emergency access, no bus routes nearby, damage to ecosystems and ignores the relief road proposal in the Neighbourhood Plan.

- **Barking Parish Council**

Object. The following issues were raised; a single access is unsafe and unsuitable for 279 dwellings, flood risk is high, congestion and poor air quality from traffic, inadequate surrounding footpaths and train service in Needham discouraging widespread use of green travel/ public transport, damage historical setting of nearby listed buildings, affordable housing provision does not address a local need, erodes a buffer between Barking and Needham, negative visual impact, light pollution, detrimental impact on ecology, loss of grade 2 agricultural land and the previous reason for refusal should be taken into account as there has been no improvement within this application from the previous one.

National Consultee (Appendix 4)

- **Environment Agency**

Holding objection. The Flood Risk Assessment is insufficient as it does not contain a Flood Response Plan in the event the access is flooded, does not address fluvial flood risk from the ordinary watercourse and does not address climate change.

- **Natural England**

No objection. Appropriate mitigation should be included in the final scheme providing adequate green infrastructure.

- **NHS**

CIL contributions would mitigate pressure and impacts on NHS by increasing capacity of GP catchment.

- **Anglian Water**

No objection. Recommend several informatives relating to Anglian Water assets and a condition for on-site foul water drainage works.

- **East Suffolk Drainage Board**

Make comments relating to the discharge of surface water and request it should be done in accordance with SUDs non-statutory standards and attenuated to the Greenfield Runoff Rates.

- **Historic England**
No comment.

County Council Responses (Appendix 5)

- **SCC Highways**
Object. The proposal only provides one access for over 150 dwellings, this access runs through a flood zone. There has been no information submitted regarding the emergency access nor the use of the bridleway, which in any event would be an unacceptable secondary access. Further consideration should be given to improving footways and cycling provision along Barking Road. The 30mph speed limit should be extended further along the frontage of the site and no travel plan has been submitted.
- **SCC Development Contributions**
CIL contributions would be sought by SCC to BMSDC for funding school places (primary, secondary and sixth form), libraries and waste. S106 obligations would also need to be secured to fund a new early years setting and associated land, and secondary school transport.
- **SCC Floods and Water**
Holding objection. Further documentation is required alongside an amended Flood Risk Assessment which should reflect and show national, local policy/guidance, predicted flood risk maps, reduction in the proposed development and proposed development layout/masterplan and updated hydraulic calculation.
- **SCC Public Rights of Way**
Object. The use of Bridleway 15 (The Drift) as an emergency access to / from the proposed development site is inappropriate. The access location is currently unsurfaced, of a limited and small width and slopes steeply upwards. The access would be unsuitable as an emergency access that could see hundreds of journeys in the event that the Barking Road access is blocked. Use of the emergency access would interfere and potentially endanger other users of the bridleway. It is also unclear how the access will be restricted to emergency use only. The bridleway would need to be upgraded to a byway prior to use by vehicles.
- **SCC Fire and Rescue**
No objection. The development must accord with Building Regulations and recommend condition for the provision of fire hydrants.
- **SCC Minerals and Waste**
Holding objection. The site falls within the Minerals Safeguarding Area and exceeds the 5ha threshold. A 'borehole and grading analysis' should be carried out on the site prior to determination, if material is found on site and it is deemed to be economical viable for extraction, they recommend a condition is imposed for material to be extracted prior to commencement.
- **SCC Archaeology**
No objection. There is a very high potential of archaeological remains on site, however this can be mitigated via conditions for 1) submission of a Written Scheme of Investigation and 2) submission of site and post investigation assessments.

Internal Consultee Responses (Appendix 6)

- **Strategic Housing**
Holding objection. Scheme provides adequate affordable housing provision but the size, number of occupants and tenure need to be confirmed. This provision would need to be secured via a S106 obligation.
- **Environmental Health- Air Quality**
Holding objection. The development is likely to generate 500 vehicle movements a day therefore a screening assessment must be submitted to demonstrate that the likely impacts on air quality are reasonable and manageable.
- **Environmental Health- Land Contamination**
No objection. Recommend informatives for contacting the LPA in the event of unexpected ground conditions and that the responsibility for safe development lies with the developer.
- **Environmental Health- Sustainability**
No objection. Recommend condition imposed to the effect that a sustainability and energy strategy should be submitted, including details on the scheme of water, energy and resource efficiency during the construction and operational phases of the development.
- **Environmental Health- Noise, Odour, Light and Smoke**
Holding objection. Noise assessment should be submitted and external lighting on the football ground taken into consideration. Recommend conditions to the effect of 1) limiting construction hours and 2) construction method statement should be submitted.
- **Waste Management**
No objection. Recommended conditions to the effect of 1) road must be suitable for waste collection vehicles, 2) access around the site must be suitable for waste collection vehicles, 3) bin presentation areas provided.
- **Public Realm**
No objection. Formal play areas would be expected to be included at the reserved matters stage.
- **Policy and Infrastructure**
Object. Not included in emerging Joint Local Plan, the Council have a 5-year housing land supply, not an allocated site in the emerging Neighbourhood Plan. Developer contributions through CIL or S106 agreements would be urgently required for schools, healthcare, transport, waste and libraries.
- **Heritage**
Did not wish to provide full comments but officers confirmed with the Heritage Team that they consider there to be a very very low to very low level of less than substantial harm to the setting of Grade II listed Kennels Farm.
- **Arboricultural Officer**
No objection. Recommend condition for the submission of an arboricultural method statement and tree protection plan.
- **Place Services Landscaping**

Object. The Landscape and Visual Impact Assessment does not fully assess impacts and whilst recommended mitigation within the assessment would reduce some landscape impact, overall the principle of development is unacceptable contrary to policy CS5, detrimentally affecting geodiversity, and the rural setting and character of Needham Market and the SLA.

- **Place Services Ecology**

Holding objection. Insufficient information has been provided on the development's impact on European Protected Species (Hazel Dormice & bats), Protected species (reptiles) and Priority species farmland birds (Skylark).

Other

- **Suffolk Preservation Society**

Object. The development does not address previous reasons for refusal, detrimental landscape impact, not included in emerging Joint Local Plan nor Neighbourhood Plan.

- **Stowmarket Ramblers**

No comment.

- **Needham Market Society**

Object. Education and GP practice already stretched, increased traffic, public transport (buses and rail) are a long way from the site, inadequately addressed flood risk, increased surface water run-off, surplus homes to those required by the Local Plan and the scale of development is disproportionate to services and facilities which will detrimentally affect existing residents.

- **British Horse Society**

No objection. However, footpaths 1 and 11 near to the site should be upgraded to bridleway/restricted byway status.

- **Mid Suffolk Disability Forum**

No objection. However they make several comments: that dwellings should be required to meet M4 of the Building Regulations, include a reasonable number of bungalows, surfaces should be firm not loose gravel, existing facilities will be strained and the railway station is not fully accessible for wheelchair users.

B: Representations

At the time of writing this report at least 52 letters/emails/online comments have been received. It is the officer opinion that this represents 52 objections. A verbal update shall be provided as necessary.

Views are summarised below:-

- Increased traffic/ highways issues (Barking Road more dangerous, road under rail bridge has not been widened, speeding, risk of accidents) (46)
- Strain on existing community facilities (schools, GP practice) (42)
- Increase danger of flooding (40)
- Affects ecology/ wildlife (37)
- Drainage (36)
- Inadequate access (32)
- Landscape impact (32)
- Loss of outlook (31)

- Loss of privacy (30)
- Loss of open space (30)
- Inadequate public transport provisions (28)
- Noise (26)
- Overlooking (25)
- Loss of light (24)
- Increase in pollution (24)
- Light pollution (19)
- Conflict with neighbourhood plan (19)
- Inadequate parking provision (19)
- Building work (18)
- Dominating/ overbearing (18)
- Same objections as on the previous scheme on site (18)
- Overdevelopment of the site (17)
- Development too high (16)
- Sustainability (14)
- Boundary issues (14)
- Scale (12)
- Existing estate is already congested by on road parking, football pitch and school (12)
- Fear of crime (11)
- Access from Quinton Road unsuitable (near school and restricted access) (11)
- Increase in anti-social behaviour (10)
- Health and safety (10)
- Needham is already under pressure from current developments under construction (10)
- Trees (10)
- Conflicts with district plan (9)
- Residential amenity (9)
- Loss of view (9)
- Loss of parking (9)
- Out of character with the area (8)
- Inappropriate in conservation area (7)
- Design (7)
- Loss of agricultural land (7)
- Not within reasonable walking distance of services and facilities (6)
- Application lacks information (5)
- Smells- odour (5)
- Relief road needs to be built to relieve congestion (4)
- No benefit to Needham Market (3)
- Conflicts with NPPF (3)
- Sewage capacity issues (3)
- Loss of greenfield site, other more suitable brownfield sites (2)
- More open space needed on development (2)
- Harm to listed buildings (2)
- Unaffordable housing (2)
- Stress on existing footpaths (2)
- No access to main A14 route (2)
- Encroaches into Barking parish (2)
- Low water pressure (2)
- Inaccurate information

- FRA not up to date
- Air pollution
- Potentially contaminated land
- SUDs not appropriate given the soil composition
- Pretend rural character in design
- No sustainable design aspects
- Destruction of rural separation between Needham and Barking
- Too close to Barking Woods SSSI
- Detrimentally affect view of users of the footpaths
- Existing residents already experience significant noise and light pollution from football pitch
- Train station does not serve those going to London

(Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation.)

PLANNING HISTORY

In 2016 the site was subject to an Outline Application for 152 dwellings (3506/16). Whilst the history on the site is acknowledged, the previous decision was made during a time where both planning policy and context were different. This proposal is therefore judged a fresh on its own merits.

REF: DC/18/05053	Screening Opinion- Approximately 290 dwellings, associated infrastructure, vehicular access, estate roads, public open space, drainage, utilities, parking, garaging and landscaping.	DECISION: EAN 19.12.2018
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REF: 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	DECISION: REF 04.08.2017
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REF: 2548/16	Screening opinion for Outline planning consent for 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 greenspace with sustainable drainage systems, and associated infrastructure, including provision for additional car parking and improved vehicular access to Needham Market Country Practice on approximately 10 hectares of land, with all matters reserved, except access.	DECISION: EAN 22.06.2016
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PART THREE – ASSESSMENT OF APPLICATION

1.0. The Site and Surroundings

- 1.1. The site extends 16.48 hectares which is solely comprised of Grade 2 agricultural land (very good quality) and is primarily within the parish of Needham Market, however a small portion along the south west of the site falls within the parish of Barking. The site adjoins but sits wholly outside of the 'Town' of Needham Market, and is therefore within the 'Countryside', as identified under policy CS1. The site is located to the north of Barking Road (B1078) and is adjacent to an existing residential estate east starting along Foxglove Avenue.
- 1.2. The site's topography is varied, with the northern area of the site being located at a higher level than to the south, representing a 17-metre difference in levels. Whilst there are some areas of trees along the north and western boundaries of the site these do not obscure or screen the views across into the site. Subsequently the site is in a visually prominent position on the approach from Barking into Needham Market. A sliver of the western area of the site falls within the Gipping Valley Special Landscape Area. The Barking Woods Site of Special Scientific Interest (SSSI) is located 825 metres to the south west of the site. There is a woodland area (Spriteshall Grove) which falls within the site along the western edge, all the trees within the woodland are protected by Tree Preservation Orders (TPOs). The site falls within a Mineral Safeguarding Area.
- 1.3. The site is not within or adjacent to the Needham Market Conservation Area, which starts along the High Street, nor are there any heritage assets within or adjacent to the application site. The Conservation Area is located 670 metres from the southern part of the site and 466 metres away from the northern part. The existing residential estate, adjacent to the site, acts as a buffer between the Conservation Area and the site. The majority of nearby listed buildings are within the High Street, the nearest other listed building outside of the Conservation Area is the Grade II listed Kennels Farm located 312 metres to the south west of the site.
- 1.4. There is a public right of way (Bridleway 15) named The Drift which runs along the northern boundary of the site going both eastwards into Foxglove Avenue and westwards towards Barking. On the southern side of Barking Road is another public right of way (footpath) which runs southwards and westwards within the parish of Barking amongst agricultural fields.
- 1.5. The nearest dwellings to the site are primarily concentrated on the eastern boundary along Foxglove Avenue, wrapping around the northern boundary as part of the existing residential estate. There are several other dwellings located more sporadically to the south of the site (Verona, The Lodge and Colchester Barn). To the west are agricultural fields which extend into and meet the main built-up area boundary of Barking. To the eastern corner of the site is the GP Surgery Needham Market Country Practice.
- 1.6. The southern area of the site and the road adjacent (Barking Road) fall within Flood Zones 2 and 3 which are the areas most at risk from fluvial (river) flooding. This part of the site and road also fall within an area at a high risk from pluvial (rainfall) flooding.

2.0. The Proposal

- 2.1. The proposal is for the erection of 279 dwellings with a single vehicular access into the site taken from Barking Road and a smaller emergency and pedestrian access into the site taken from the north along The Drift (bridleway). 100 of the 279 dwellings would be affordable units. The housing mix of the dwellings is not yet confirmed as this is an Outline Application, however it could be conditioned to be submitted for approval concurrently with a Reserved Matters Application.
- 2.2. As the proposal is currently in the form of an Outline Application, specific matters of appearance, scale, layout and landscaping of the dwellings and wider site are not matters for consideration. That said in submitting such an application it is incumbent upon an applicant to demonstrate how the development being applied for can appropriately respond to its situational context.
- 2.3. Whilst the following matters cannot be confirmed at this stage, the applicant has provided an indicative plan helping demonstrate the type of development that could materialise on site. The gross density of the development, when measured from the indicative masterplan, is 16.9 dwellings per hectare. In relation to the indicative masterplan, the separation distances that could be achieved between the existing dwellings along Foxglove Avenue and the proposed dwellings is a minimum of 39 metres.

3.0. Principle of Development

- 3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, then that determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 3.2. Policy CS1 identifies a settlement hierarchy based on the services, facilities and access within the locality and accordingly directs development towards the most sustainable areas in regard to location. Under policy CS1, Needham Market is identified as a 'Town' and Barking is a 'Countryside Village'. The site sits between these two settlements within the 'Countryside'. Policies CS2 and H7 are subsequently engaged where development is proposed within the countryside. Policy CS2 looks more broadly at all forms of development within the countryside and policy H7 looks specifically at housing in the countryside. Policy CS2 sets out a range of countryside compatible development but includes restricting housing unrelated to the needs of the countryside. H7 echoes the sentiment of CS2 by steering housing towards existing settlements away from the countryside. Elements of these policies are not wholly consistent with the NPPF and therefore they are afforded less than full weight. However, they nonetheless seek to encourage sustainable and compatible forms of development which do not detrimentally impact on the countryside, steering development to the most sustainable areas, an approach which is consistent with the aims of the NPPF.
- 3.3. Policies CS4, and CS5 are further relevant in determining the acceptability of the principle of development on site, by assessing the relationship with existing development and the character of the locality, specifically with regard to flood risk, pollution, landscape and biodiversity. These policies hold full weight as they are wholly consistent with the aims of the NPPF.
- 3.4. Policies CS1, CS2 and H7 are afforded less than full weight as they adopt a prescriptive and blanket approach towards development which is not wholly consistent with the flexibility the NPPF seeks to encourage when assessed against paragraph 213 of that document.
- 3.5. Whilst policies CS1, CS2 and H7 may in isolation be considered 'out-of-date' in the circumstances of this application, in so far as they are not wholly consistent with the aims of the NPPF, and have, to some extent, been overtaken by other matters 'on the ground', they are not

the only pertinent policies engaged in the decision-making process of this application. Based on the scale and particulars of this application, there are many other equally as relevant and pertinent policies in play in determining the application and which are considered to be 'most important' within the parlance of the NPPF. Such other policies (as listed above) are considered to be wholly consistent with the Framework and in isolation they hold full weight. To engage the 'tilted balance' on the basis that some policies in isolation do not hold full weight, would be to neglect and ignore that the other policies, which are equally if not more important, in determining the application are wholly consistent with the NPPF. Thus, to engage the 'tilted balance' on the basis that some of the 'relevant' and 'most important' policies do not hold full weight, would be to ignore and neglect the wider basket of policies which are consistent with the NPPF, and the very spirit of the NPPF in its aims for a plan led approach. On the basis of the consistency and weight of the wider basket of policies 'relevant' and 'most important' to this application, the 'tilted balance' of the presumption in favour of sustainable development, as set out within paragraph 11d) of the NPPF is not engaged. Moreover, the Council can demonstrate that it has an adequate 5-year housing land supply, currently measured at 7.67 years (October 2020) and has passed the most recent Housing Delivery Test.

- 3.6. The decision not to engage the 'tilted balance' when assessing this application is particularly relevant in light of the *Wavendon Properties Limited v SSCLG and Milton Keynes Council* [2019] EWHC 1524 (Admin). The Wavendon Case confirmed that whilst one of the 'most important' policies in the decision-making process can be considered to be 'out-of-date' this in itself is not enough to engage the 'tilted balance'. As in this instance, the 'most important' policies, when taken as a whole, are considered to be consistent with the NPPF and therefore engaging the 'tilted balance' in this case would be incorrect.
- 3.7. The Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2020) produced in support of the emerging Joint Local Plan identifies whether there is sufficient land available to meet projected housing and economic growth within the districts. As part of this, sites are broadly assessed for their availability based on a range of factors, including suitability. Whilst no planning status or merits of sites are engaged within this assessment, it nonetheless provides a useful starting point to determine the current status of the land in regard to its suitability. This application site is included within the SHELAA under site reference SS0028; in the SHELAA potential issues of the site are identified, these include the safety of access through a flood zone, minerals, biodiversity and potentially contaminated land.
- 3.8. Whilst both the emerging Joint Local Plan and the draft Needham Market Neighbourhood Plan currently hold limited weight, they provide useful indications on the direction of travel of the Council. Under both documents, the site is not allocated for development. The emerging Joint Local Plan continues to designate Needham Market as a 'Town' and Barking as a 'Hinterland Village' under policy SP03. The site is mentioned within the Needham Market Neighbourhood Plan in regard to a relief road, whilst this is discussed further in section 5.0. of this report, the proposed development notably does not take this relief road into account. Therefore, while there might be an indication that the site *could* be proposed for allocation in the future, it does so through the consideration of a comprehensive approach to development on the western fringes of the town and in order to facilitate a specific item of infrastructure. The application development is in effect piecemeal and an exclusive parcel of land that has no regard to any broader masterplan or strategy as indicated within the draft Neighbourhood Plan and so even if any weight were to be attached to that aspiration within the Neighbourhood Plan, the proposed development would be in conflict with it.
- 3.9. Whilst the site may adjoin an existing residential development, it would result in the infilling of a buffer and gap that currently separates the parishes of Needham Market and Barking. The

resultant development would therefore encroach into the countryside and gap altering the relationship and landscape between Needham Market and Barking. Inherently, based on the existing pattern of development along Foxglove Avenue and the wider residential estate, the development of the site would appear discordant and incongruous and would have no visual relationship with the existing development within Needham Market contrary to policy CS5.

- 3.10. In light of the above justification, the proposed erection of 279 dwellings on site is therefore not considered to be acceptable in principle. The site's location, strictly within the countryside, would be contrary to policies CS1, CS2, CS5 and H7. Whilst some of these policies may have less than full weight, they nonetheless have a useful position in determining areas most suitable for development. Residential development on this site would represent and adopt a discordant and incongruous form, with a forced and incoherent relationship with the existing adjacent development.

4.0. Nearby Services and Connections Assessment of Proposal

- 4.1. As a town Needham Market has a variety of services and facilities to support residents. The nearest of these services and facilities to the site include: Bosmere Community Primary School, Community Centre (both north east of the site) and the GP Surgery Needham Market Country Practice and Pharmacy and the Co-Op (south east of the site).
- 4.2. Based on the size of the site, two measurements have been taken to show the distances from the north and south of the site to the nearest services, facilities and public transport provision.

From the northern access of the site, the following key distances were calculated:

- 643 metres to the Co-Op along Barking Road
- 320 metres from Bosmere Community Primary School
- 643 metres to Needham Market Train Station

From the southern access of site, the following key distances were calculated:

- 643 metres to the Co-Op along Barking Road
- 1126 metres to Bosmere Community Primary School
- 965 metres to Needham Market Train Station

In the context of walking distances, the Chartered Institution of Highways and Transportation (CIHT) Guidelines for Providing for Journeys on Foot identifies acceptable distances for various journeys such as commuting, walking to school and recreation. The following walking distances are identified:

Desirable - within 500 metres
Acceptable - within 1000 metres
Considered - within 2000 metres

As per the above all the distances are within the considered parameters. However, it is the quality of the connection that also makes a difference in judging the extent to which future occupiers are likely to walk to them (considered further in section 5.0.).

- 4.3. There is only one bus route connecting Needham Market to Stowmarket, Claydon, Great Blakenham and Ipswich. The buses are regular, but the bus stop (The Swan) is located 965 metres away from the south of the site and 482 metres from the north of the site.

- 4.4. The existing cycling provision within the locality is limited and is comprised of the bridleways (15 and 17) north of the site which lead into Needham Market. There is otherwise no cycling infrastructure to the south of the site along Barking Road.
- 4.5. As discussed in Section 5.0. in further detail, in the event of flooding there is the risk that occupants in the dwellings in the southern section of the site would be forced to travel further than the distances measured above as they may not be able to gain safe access onto Barking Road and may have to travel northwards out of the site first.

5.0. Site Access, Parking and Highway Safety Considerations

- 5.1. Whilst this is an Outline Application it includes access as a matter for consideration.
- 5.2. For 279 dwellings one single access point is proposed to the southern side of the site connecting onto Barking Road. This access goes through Flood Zones 2 and 3 and is in an area at high risk from pluvial flooding, it is therefore highly likely that this access would flood regularly trapping residents within the site without vehicular means of access in or out of the site. SCC Highways have recommended refusal as there needs to be more than one main access and at least one main access needs to be sited outside of Flood Zones 2 and 3 to serve 279 dwellings. One access is sufficient to support a maximum of 150 dwellings according to design guidance. While guidance only, the practical difficulties associated with the specific circumstances of this application proposal highlights the issue at hand. SCC Highways have confirmed there has been a history of complaints being made about flooding along Barking Road and surrounding areas.
- 5.3. It is proposed that an emergency access could be taken off of The Drift (bridleway) to the north. The Drift is currently a dirt track measuring 5 metres in width and slopes steeply upwards where the emergency access is proposed. A private access road, which connects to Quinton Road, joins the bridleway to the east, but is smaller in width than the bridleway, measuring 4 metres. The private access road also provides a link to Needham Market Football Club opposite the site. Based on the spatial constraints of the bridleway and private access road, it is highly unlikely that they could be altered and upgraded to accommodate vehicular traffic, including emergency vehicles. SCC Public Rights of Way and SCC Highways have objected to the creation of an emergency access in this location as it would be inappropriate and unsuitable in any event and is likely to adversely affect and discourage the use of the bridleway. Moreover, as the emergency access would cross a bridleway, the bridleway would have to be upgraded to a byway in order to be used by vehicles. Changing the bridleway to a byway would be subject to securing a separate consent from SCC Public Rights of Way. This consent would have to be in place prior to determination to ensure an emergency access could be created in this location. As this consent has not been secured at this stage and based on the comments received by SCC Public Rights of Way, it is unlikely this consent would be granted in any event, therefore, the Council cannot be certain that the necessary consent that would facilitate the creation of an emergency access could be secured in the event planning permission is granted.
- 5.4. The plans and documents submitted have several inconsistencies between them and it is noted that on some of the plans the northern emergency access is referred to as a 'main access', which is misleading. Furthermore, there are no details on the width, surfacing, users, monitoring or operation of this emergency access. Moreover, the site location plan does not connect to highway land to the north where the emergency access is proposed and instead adjoins a bridleway. The

nearest highway land is along Quintons Road which is separated from the application site by both bridleway and private land, and no details have been provided to show how the emergency access would adjoin to highway land. Even if the applicant has a right of access over the private land, no information has been submitted regarding the extent of and form of access rights.

- 5.5. Based on the lack of information and clarity on the emergency access north it is reasonable to assume that there are several possible outcomes for the use of the emergency access. Firstly, the emergency access could solely be used by emergency vehicles in flood events, however this would continue to trap residents on the site as they would have no alternative vehicular means of access. Alternatively, based on the increasing frequency of flood events with climate change, this may become a regularly used emergency access during flood events by both emergency vehicles and the residents of 279 dwellings, resulting in traffic being diverted through the residential estate east. Again, the increasing frequency of flood events may result in the access being used as an additional main access in and out of the site all year round without any control, which could result in a significant amount of unplanned traffic travelling through the residential estate east of the site. The northern access is a wholly inappropriate and unsuitable access for all eventualities, including emergency use. None of the aforementioned outcomes are considered acceptable from the perspective of Planning, SCC Highways and SCC Public Rights of Way to serve the future residents of 279 dwellings.
- 5.6. The traffic generated from 279 dwellings has been assessed by SCC Highways who confirmed that Barking Road has got capacity to accommodate these increased flows. However, the traffic modelling in the applicant's Transport Assessment has not taken the emerging Joint Local Plan allocations into account as it was produced in February 2019. Therefore, planned growth and some committed development has not been accounted for. Whilst the emerging Joint Local Plan has limited weight, it presents a direction of travel, including future planned growth, two of the allocations also already benefit from planning permission granted in the latter part of 2019 and therefore constitute forms of 'committed development'. These are LA031 (former Needham Market Middle School) for 41 dwellings and LA032 (former Mid Suffolk District Council Offices) for 94 dwellings. The final allocation is LA030, which is Land West of Stowmarket Road for 66 dwellings. In total this planned growth accounts for an additional 201 dwellings, the traffic from which has not been taken into account. As the planned growth has not been included in the Transport Assessment, SCC Highways cannot be certain of the impacts this unplanned growth may have in cumulation with the planned growth. This application represents unplanned growth, and as Barking Road is close to capacity it could mean that highway mitigation, which has not been planned for nor previously anticipated, is required for planned growth. The proposal will undoubtedly take capacity away from planned growth without certainty of impacts.
- 5.7. The current 30mph speed limit along Barking Road does not fully cover the proposed southern access. The applicant has therefore stated they would increase the 30mph speed limit 24 metres further along the frontage to cover the access. Whilst SCC Highways recommend that this extension is increased 100 metres to cover the entire frontage of the site, its extension 24 metres would however be acceptable. The extension of the 30mph speed limit would be secured through the imposition of a Grampian condition requiring a Traffic Regulation Order (TRO) to the effect that no development can commence without the TRO being resolved.
- 5.8. As part of the development a short section of 3-metre-wide shared cycleway and footway is proposed to link the south of the site to the existing footway to the west, whilst these links are necessary there has been no consideration of the practicalities of these links. The proposed shared cycleway and footway would link onto existing older footways, which measure between 1.2 and 1.8 metres in width. Current guidelines state that footways should be a minimum of 2 metres in width. Whilst these are existing footways, there has been no practical consideration on

how future residents of 279 dwellings would experience and use active transport and the existing footway/ cycleway network. As there is a sudden decrease in width, not only will cyclists have to use the road, but it is likely pedestrians will be pushed onto the road, which for wheelchair users and children's pushchairs is particularly hazardous and may act as a deterrent from walking. The existing footways along the south of the site are within highway land and therefore they could reasonably be improved around the site to increase sustainability, encourage safe active travel and better link the site to Needham Market. Furthermore, SCC Highways have received many complaints about speeding along Barking Road and therefore it is considered a particularly hazardous area for pedestrians. Thus, the combination of increased footfall and varying footway widths may force pedestrians to walk on the road, increasing the risk of accidents and deterring them from sustainable travel. Whilst it may adjoin the settlement boundary for Needham Market, the current and proposed connectivity of the site to Needham Market prevents any meaningful integration with the town.

- 5.9. As the proposal is for a development that would generate significant amounts of movement, a Travel Plan is required as per paragraph 111 of the NPPF to assist in reducing the reliance on private motor vehicles. No travel plan has been submitted, as such there has been no strategy submitted to encourage and promote suitable and effective sustainable means of travel to and from the site.
- 5.10. The draft Needham Market Neighbourhood Plan, seeks to explore, propose and support the creation of relief road alleviating and diverting traffic along the High Street and at the Barking Road junction. It is understood that SCC Highways have provided a response during the consultation to this stage of the plan which indicates that they have no intention of supporting the relief road in their adopted Local Transport Plan (2011-2031) as it is not considered feasible or a critical infrastructure need. Moreover, the approximate cost for highways works of this scale (£88 million) would not be facilitated nor met by any contributions made by the developer should this site be approved for development. Notwithstanding SCC Highways position, the likely cost of the relief road and that the plan currently holds limited weight, the plan purports to suggest that this relief road would be developed and delivered through an overarching and coherent strategy for the western side of Needham Market. This proposal does not consider or address this proposed relief road in any way and instead represents and constitutes an incoherent piecemeal approach to development within the area.
- 5.11. Whilst layout is not a matter for consideration at this stage, it is considered that adequate parking provision could be accommodated on the site in accordance with SCC Parking Guidance (2019).
- 5.12. The proposal in respect of highways is therefore contrary to development plan policies CS4, T10, T11, T12 and RT12 and paragraphs 98, 102, 103, 108, 109, 111 and 127 of the NPPF. The proposal cannot demonstrate safe and suitable access for all, with the single main access going through areas at a high risk from flooding and the emergency access proposed being wholly unsuitable for use. The location of the emergency access would detrimentally affect the use of the bridleway, which also requires consent to be upgraded to a byway prior to determination to be

used by vehicles. Moreover, as the proposal is for 279 dwellings a single access point is inadequate. The Transport Assessment does not take into account neither all committed development nor planned growth. No travel plan has been submitted to demonstrate that the site will benefit from sustainable travel modes. The development sits incoherently with the existing footway/ cycle network within Needham Market and does not seek to improve or create a well-designed place by improving existing provision and connectivity of both cycling and pedestrian infrastructure.

6.0. Design and Layout

- 6.1. As the proposal is currently at the outline stage with all matters reserved except access, consideration of design and layout is limited at this stage.
- 6.2. Whilst the masterplan shows the curtilage of several dwellings within the southern area of the site falling within Flood Zones 2 and 3, it is considered that there is adequate space to be able to reconfigure the layout of the site in order to sequentially site all dwellings completely within Flood Zone 1 (the least vulnerable to fluvial flooding).

7.0. Landscape Impact, Trees, Ecology, Biodiversity and Protected Species

- 7.1. Place Services Ecology reviewed the submitted ecological information and raised a holding objection. Insufficient information has been provided in respect of European Protected Species (Hazel Dormice and bats), Protected species (reptiles) and Priority species (farmland birds-Skylarks). Whilst reports were submitted, these reports date back to 2016 and are therefore considered out of date. Based on the loss of agricultural land, Skylarks nesting territories will be lost and therefore a Farmland Bird Mitigation Strategy must be adopted to secure offsite compensation for the maximum number of territories that could be present on site currently. As insufficient information has been submitted the Council cannot discharge its duties under S40 of the Natural Environment and Rural Communities Act 2006.
- 7.2. Natural England reviewed the proposal in respect of the Barking Wood SSSI located to the south west of the site and raised no objection to the proposal and its impact on the SSSI currently. However adequate green infrastructure will be expected in a Reserved Matters Application to prevent future inappropriate use of the SSSI.
- 7.3. The Council's Arboricultural Officer confirmed that whilst there is a wooded area to the western edge of the site containing trees protected by Tree Preservation Orders, these could be appropriately protected and there would be no direct impact from the development on the trees.
- 7.4. Suffolk's Landscape Character Assessment identifies that the northern elevated part of the site is comprised of Ancient Plateau Claylands and the southern portion is Rolling Valley Farmlands. The Council's Landscape Sensitivity Assessment (September 2020) identified that the site is an area that would have a moderate landscape sensitivity to residential development, stating that "*The landscape makes a positive contribution to the rural setting and character of Needham Market and provides a rural backdrop to existing settlement...The development of the site is likely to be perceived as encroachment into the countryside. Other sensitive features including the sloping landform, undeveloped backdrop provided to existing settlement, open views and deciduous woodland habitat*". The development of the site would represent an encroachment into the open countryside. The site has both a wider importance abutting and partially falling within the Gipping Valley Special Landscape Area and adopts more localised significance, as its prominent elevated location acts as a transitional buffer between the urban area of Needham Market and rural area of Barking.

- 7.5. Based on the above, Place Services Landscaping raised an objection to the proposal from the perspective of landscape harm. They identified that the submitted Landscape Visual Impact Assessment does not adequately appraise the area and whilst recommended mitigation would reduce some impact, this is not sufficient to overcome the landscape harm that would result from the development of the site.
- 7.6. The proposal would therefore be contrary to development plan policies CS5, CL2 and CL8 and paragraphs 170 and 175 of the NPPF, which seek to protect landscape qualities and biodiversity, confirming that the intrinsic value of the landscape and biodiversity is of great importance and weight and should be viewed within its wider context not just in isolation in the context of specific sites.

8.0. Land Contamination, Flood Risk, Drainage and Waste

- 8.1. Environmental Health assessed the application and the submitted Phase I Report from the perspective of land contamination and subsequently raised no objection to the proposal.
- 8.2. Environmental Health assessed the application in respect of its impact on air quality. Whilst the site is not within an Air Quality Management Area, as the development could result in 500 plus vehicle movements a day, a screening assessment guided by the Institute of Air Quality Management needs to be submitted to ensure there is no adverse impact on the air quality of the area. This information has not been submitted and therefore the Council cannot be sure that this development would not result in any adverse impact and therefore adopt a precautionary approach.
- 8.3. The site falls within the Minerals Safeguarding Area and exceeds the 5ha threshold, therefore a borehole and grading analysis needs to be carried out on the site prior to determination. If material is found on site and it is deemed to be economical viable for extraction, a condition would be required to the effect that this material would need to be extracted prior to commencement. No borehole and grading analysis has been carried out on site to determine if there are any minerals in the ground and whether they are economically viable. Therefore, insufficient information has been provided on this ground contrary to policy MP10 of the Suffolk Minerals and Waste Plan, which seeks to secure any economically viable minerals, as supported by paragraphs 203 and 204 of the NPPF, which states that as minerals are a finite resource their management is essential.
- 8.4. Based on the size of the site and the high risk of fluvial and pluvial flooding, a Flood Risk Assessment is required. Both the Environment Agency and Local Lead Flood Authority raised holding objections to the proposal. The Flood Risk Assessment is dated from 2018 and cannot be relied upon as flood maps were most recently updated in January 2020. Further documentation and updated information is required, this includes, a drainage strategy, Flood Response Plan, consideration of ordinary watercourse and climate change, contour plan, impermeable areas plan, preliminary (indicative) layout drawings, preliminary site investigation report, preliminary hydraulic calculations and any evidence of third-party agreements to discharge to their system. No further nor updated reports have been submitted, therefore there is insufficient information for the Council to ensure that the site will not increase flood risk elsewhere and that the development itself is safe from flooding for its lifetime and therefore adopts a precautionary approach.
- 8.5. The proposal would therefore be contrary to development plan policies CS4, H17, MP10 and paragraphs 155, 163, 165, 170, 203 and 204 of the NPPF, potentially putting existing and future residents at risk from pollution and flooding.

9.0. Heritage Issues

- 9.1. The Council's Heritage Team did not wish to offer full comments on the application but provided some comments to justify their approach stating that: *'The proposal has potential to affect the setting of any nearby heritage assets. The only one likely to be affected, in view of its location and character is Kennels Farm, a listed farmhouse on the rising ground to the south of Barking Road which I have visited in connection with a previous application. Its setting is predominantly rural with the urban edge of the town to the north. The proposal would bring that edge closer, increasing the quantum of residential development and slightly widening its arc as viewed from the listed building. But as the development would not fundamentally change the character of land in the setting, I concluded that a formal assessment of significance and impact by myself was not necessary in this instance'*.
- 9.2. Having discussed the matter further with colleagues in the Heritage Team, officers have concluded that there would be a 'very very low to very low level of less than substantial harm' to the setting of the Grade II listed Kennels Farm by the proposed development. As a level of harm has been identified, regardless of its level, paragraph 196 of the NPPF is thus engaged. The statutory duties within the Listed Buildings Act impose a presumption against granting planning permission where harm is identified and harm of any quantum, is a matter of considerable importance and weight. Paragraph 196 requires harm to be weighed against public benefits. In this instance officers are satisfied that 279 dwellings, including 100 affordable homes would be a significant 'public benefit' for the purposes of paragraph 196, which outweighs the level of harm identified. Such harm, however, nevertheless falls to be considered again in the overall balance along with the benefits.

10.0. Impact on Residential Amenity

- 10.1. The indicative plans demonstrate that the quantum of development proposed could enable separation distances between existing dwellings along Foxglove Avenue at a minimum of 39 metres and adequate green space. Moreover, by way of the site's location and indicative masterplan there would be no loss of light, privacy or overlooking for both existing and any future occupants in and around the site.
- 10.2. Whilst issues of light, privacy and overlooking could be mitigated against in a finalised design, the proposal undoubtedly does not represent a 'well-designed' place for existing residents or future occupants of the site, contrary to paragraph 127 of the NPPF. The connections to Needham Market are inadequate and unsafe with opportunities for active travel impeded by inadequate infrastructure. As assessed by statutory consultees, insufficient information has been submitted to indicate that existing and future occupants would be protected and safe from noise, air and light pollution and flood risk.
- 10.3. Whilst no information has been submitted around the use of the 'emergency access' if the access is to be used by main vehicular traffic of the site, there would undoubtedly be a conflict of use between the access and users of the bridleway, increasing the risk of accidents and discouraging users of the bridleway. The proposal could significantly alter the experience of the bridleway to the north of the site.
- 10.4. Environmental Health assessed the proposal from the perspective of Noise, Odour, Light and Smoke and raised a holding objection based on insufficient information relating to the noise and light impacts. Based on the site's proximity to Needham Market's football ground and training pitch, an Environmental Noise Assessment is required to determine any detrimental impacts on

future occupants of the site. The existing flood lighting at the club should also be taken into account. Whilst it is acknowledged that there are existing dwellings near to the football ground, the applications site is located closer to and in a different position to the existing residential estate. As there have been several complaints to the Environmental Health Team from existing residents, it is imperative this information is supplied to ensure the impacts on any future residents are assessed. As insufficient information has been submitted, the Council cannot be certain on the impacts and therefore adopt a precautionary approach.

- 10.5. The proposal is therefore contrary to development plan policies CS4, SB02, GP01, RT12, H17 and paragraphs 98, 127 and 170 of the NPPF.

11.0. Planning Obligations / CIL

- 11.1. The development would be required to make contributions to CIL. The NHS has confirmed they would expect CIL monies to be used to fund further capacity within the NHS's local facilities to accommodate residents of the 279 dwellings.
- 11.2. The emerging Joint Local Plan identifies potential strains on primary school and pre-school places and Stowmarket's Household Water Recycling Centre from growth within Needham Market. Contributions would be required to be made to the following via a S106 agreement; travel plan implementation, public rights of way improvements, affordable housing, education, waste and libraries these would be secured via a S106 agreement.

12.0. Parish Council Comments

- 12.1. Both the parishes of Needham Market and Barking have provided comments on the application. These comments have been taken into account and the above report has explored and assessed the planning related issues raised in detail.

PART FOUR – CONCLUSION

13.0. Planning Balance and Conclusion

- 13.1. Decision taking begins with the development plan and it is of vital importance that planning decisions are plan-led. The NPPF, an important material consideration, reiterates this fundamental point.
- 13.2. The application is deficient in a number of ways, with insufficient information being provided in respect of highways, flooding, ecology, minerals, air quality, noise and light pollution. The Council cannot be satisfied that the development would be acceptable in relation to those matters in the absence of appropriate detail. It is therefore wholly reasonable that the Council have adopted a precautionary approach where insufficient information has been provided, as the level and type of impact cannot be understood nor appropriately assessed and mitigated on the basis of the information submitted.
- 13.3. Whilst the site may be within walking distance of services and facilities, it represents a wholly incongruous and discordant form of development in consideration of the immediate and wider context of the area. Furthermore, the infrastructure for supporting active travel is lacking, incoherent and not well integrated with the existing infrastructure. The development represents a highly detrimental encroachment into the countryside, served by inadequate and unsafe access in all scenarios.
- 13.4. The Council can demonstrate an adequate 5-year housing land supply (measured at 7.67 years), furthermore the basket of policies engaged in determining this application, when taken as a whole, are consistent with the aims of the NPPF by supporting sustainable and appropriate forms of development. The application therefore does not benefit from the engagement of the 'tilted balance'.
- 13.5. Assessed against the policies of the NPPF taken as a whole, the application performs no better. It would be contrary to the development plan and national planning policy and there are no material considerations that justify a departure from those policies; the harm that has been identified significantly and demonstrably outweighs the benefits.
- 13.6. In conclusion this proposal for outline permission for the erection of 279 dwellings with access to be considered represents a wholly inappropriate and discordant form of development, which does not reflect but rather undermines the overall strategy of Mid Suffolk's Development Plan.

RECOMMENDATION

- 1) That Members resolve to: refuse planning permission, for the following reasons:
 - i) The proposal strictly conflicts with Mid Suffolk's Core Strategy policies CS1 and CS2 and Local Plan policy H7, as it is located outside of the settlement boundary for Needham Market and is within the countryside. The development does not accord with the exceptional circumstances tests applied under policies CS2 and H7 and is not considered a countryside compatible development. The proposal would extend the urban edge of Needham Market into a sensitive countryside landscape gap, which would represent an incongruous and discordant growth on the western edge of Needham Market which would not be well integrated and would have minimal relationship with the existing settlement, contrary to Core Strategy policy CS5.

- ii) There is a single main access into the site along the southern boundary, which is inadequate to serve 279 dwellings and runs through an area at a high risk from pluvial and fluvial flooding. In the event of flooding there would be no means of suitable access in or out of the site. The development would be significantly affected by flooding and is thus contrary to Core Strategy policy CS4. The proposed emergency access onto The Drift (bridleway) north is wholly inappropriate for both irregular and regular or widespread use and would pose a danger to and discourage users of the bridleway. Notwithstanding its unsuitability, insufficient information has been submitted relating to the emergency access and the site location plan does not show how this access point connects onto the highway. Moreover, the bridleway would need to be upgraded to a byway in order to be used by vehicles, for which separate consent is required prior to determination and this has not been resolved. Furthermore, insufficient information has been submitted in respect of sustainable transport means through the provision of a suitable travel plan. The existing footway and cycleway network, together with the proposed 3-metre-wide southerly connection has not been coherently and holistically integrated in the proposal, resulting in poor connectivity from the site into Needham Market, whilst simultaneously acting as a deterrent to active and sustainable travel and increasing dangers to pedestrians walking along the southern boundary of the site. The Transport Assessment inadequately addresses and accounts for both committed development and planned growth within the area. The impacts on the highway network for existing and future occupants on the site and within the locality would be significant and unacceptable, contrary to Local Plan policies T10, T11, T12 and RT12 and paragraphs 98, 102, 103, 108, 109, 111 and 127 of the NPPF.
- iii) The landscape would be irreparably and detrimentally altered through its development. This area provides an important landscape buffer and gap between Needham Market and Barking, through the transition of an urban area to a rural area. The site slopes and is in a visually prominent and elevated position on the approach into Needham Market. The landscape quality of the area is notably sensitive providing a rural backdrop to Needham Market and its development would undermine the character and appreciation of the intrinsic value of the landscape in isolation and within its wider context. Development of the site would result in the loss of very good (Grade 2) agricultural land without adequate justification. The landscape harm arising from the proposal would stand in conflict with Core Strategy policy CS5, Local Plan policies CL2 and CL11 and paragraph 170 of the NPPF.
- iv) Insufficient information has been submitted to demonstrate that the site could be safely developed from the perspective of flood risk. Therefore, it is not certain whether the development would be safe for its lifetime, nor whether it would increase flood risk elsewhere. This is contrary to Core Strategy policy CS4 and paragraphs 155, 163 and 165 of the NPPF.
- v) Insufficient information has been submitted to enable full and sufficient assessment of the ecology of the site, potential ecological impacts and the necessary mitigation required as a result of the development. This is contrary to Core Strategy policy CS5, Local Plan policy CL8 and paragraphs 170 and 175 of the NPPF.

- vi) Insufficient information has been submitted to ensure that there would be no adverse impact on air quality within the site and its surroundings, from significant vehicle movements as a result of the development. The proposal is therefore contrary to Core Strategy policy CS4, Local Plan policy H17 and paragraph 170 of the NPPF.
- vii) Insufficient information has been submitted to demonstrate that existing noise and light pollution from Needham Market Football ground and training pitch would not detrimentally affect future occupants of the site on the basis of their location and proximity to the club. The proposal therefore conflicts with Local Plan policy H17 and paragraph 170 of the NPPF.
- viii) Insufficient information has been submitted to determine what type of minerals are located on site and whether these minerals are economically viable and thus need to be extracted from the site. The proposal therefore conflicts with Suffolk Waste and Minerals Plan policy MP10 and paragraphs 203 and 204 of the NPPF.

The development conflicts with the development plan when taken as a whole and there are no material considerations which indicate that a decision should be taken other than in accordance with the development plan.

- 2) In the event that an appeal against the refusal of planning permission is received, delegate authority to the Chief Planning Officer to defend that appeal for the reasons set out under (1) above, being amended and/or varied as may be required.

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Application No: DC/20/05046

Location: Land on the North West Side of Barking Road, Needham Market

Page No.

Appendix 1: Call In Request	N/a	
Appendix 2: Details of Previous Decision	N/a	
Appendix 3: Town/Parish Council/s	Needham Market Town Council Barking Parish Council	
Appendix 4: National Consultee Responses	Environment Agency Natural England NHS Anglian Water East Suffolk Drainage Board Historic England	
Appendix 5: County Council Responses	SCC Highways SCC Development Contributions SCC Flood and Water SCC Public Rights of Way SCC Fire and Rescue SCC Minerals and Waste	

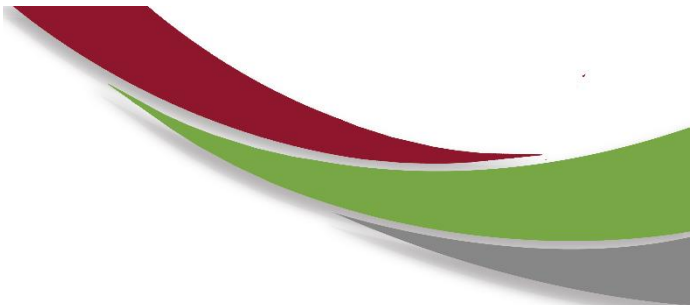


Babergh and Mid Suffolk District Councils



	SCC Archaeology	
Appendix 6: Internal Consultee Responses	MSDC- Strategic Housing MSDC- Environmental Health (Air Quality) MSDC- Environmental Health- (Land Contamination) MSDC- Environmental Health- (Sustainability) MSDC- Environmental Health (Noise, Odour, Light and Smoke) MSDC- Waste Management MSDC- Public Realm MSDC- Policy and Infrastructure MSDC- Heritage MSDC- Arboricultural Officer MSDC- Landscaping (Place Services) MSDC- Ecology (Place Services)	
Appendix 7: Any other consultee responses	Suffolk Preservation Society Stowmarket Ramblers Needham Market Society British Horse Society Mid Suffolk Disability Forum 52 representation letters/ emails/ online comments, comprising of 52 objections.	





Appendix 8: Application Site Location Plan	Yes	
Appendix 9: Application Plans and Docs	Yes	
Appendix 10: Further information	N/a	

The attached appendices have been checked by the case officer as correct and agreed to be presented to the committee.



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NEEDHAM MARKET TOWN COUNCIL

Kevin Hunter
Town Clerk

Mrs Kelaine Spurdens
Assistant Town Clerk

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Needham Market Town Council

Consultation Submission Letter

DC/20/05046 Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990.

Erection of 279No dwellings (including 100 affordable dwellings) and access. Land On The North West Side Of Barking Road Needham Market Suffolk

21st January 2021

Dear

The Town Council's Consultation Submission consists of this letter and its separate Consultation Submission Report.

The Town Council **objects** in the strongest terms to the Planning Application.

The Consultation Submission Report provides the details supporting the objection. There is an overriding factor the Town Council wishes to be taken account of in the determination process.

The Town Council ardently believes the obligations for the process of public consultation, required under the provisions of Article 15 of the Development Management Procedure Order, cannot be achieved in current circumstances whilst the local community is subject to severe restrictions under Central Government's Coronavirus Tiers and more latterly, the current National Lockdown. The Town Council has consequently been unable to engage with and involve the local community in the consultation process as it would normally ensure it does so. For this reason, the Town Council recommends Mid Suffolk District Council negotiate a Planning Performance Agreement with the applicant or, if that is not possible, suspends determination of the application until such time as its obligations to consult can be fully exercised.

Yours sincerely,

Town Councillor Steve Phillips
Chairman of Council and Town Mayor



Needham Market Town Council

Consultation Submission Report

DC/20/05046 Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990.

Erection of 279No dwellings (including 100 affordable dwellings) and access. Land On The North West Side Of Barking Road Needham Market Suffolk

1. Site Context and Constraints

1.1 An outline application on part of the site was refused by Mid Suffolk District Council in August 2017 (Reference No: 16/3506). The application was recommended for approval by Officers and at the time the District Council could not evidence a 5-year housing land supply. The recommendation was overturned by the Planning Committee and the reasons for refusal were:

- The main access point was at risk of flooding
- The distance from school and community facilities
- It was not considered to be good design
- The application was no considered to conserve or enhance the character of the area
- The application did not constitute sustainable development

The refusal was not appealed.

1.2 The site was put forward for inclusion in the emerging Local Plan in 2018 by a developer. It is not known if the developer is still connected to the site as the application is made by the landowners.

1.3 The site was assessed through the SHELAA, which was updated in October 2020 ahead of the publication of the Pre-Submission (Regulation

19) Version of the Babergh Mid Suffolk Joint Local Plan (Site SS0028). The SHELAA identifies the site as suitable for development in principle subject to further work to be undertaken to investigate the following issues:

- Safety of access through a flood zone
- Part of the site lies within a Mineral Safeguarding Area
- Potential for Flood risk impacts on nearby Site of Special Scientific Interest

- 1.4 The site lies outside of the Settlement Boundary for Needham Market and for Barking as identified in the Adopted and Emerging Local Plans and the emerging Needham Market Neighbourhood Plan.
- 1.5 The site lies outside of the Conservation Area for Needham Market and there are no formal wildlife designations on site.
- 1.6 The site is not allocated for residential development in the Adopted Local Plan, or the emerging Local Plan or the emerging Neighbourhood Plan.
- 1.7 The Pre-Submission Version of the BMSJLP was approved for consultation on the 12th November 2020; the application was submitted on the 10th November which was prior to the Local Plan being formally published although it was available as part of the committee papers for the preceding week. It is therefore unlikely that the application has been informed by the emerging JLP to any great extent and reference to the emerging JLP in the application's supporting information are likely to be references to the previous version which was published in July 2019. The consultation period for the JLP 2020 ran until 24th December 2020 and it is expected that the JLP will be submitted for examination early in 2021.

2. Assessment against the Adopted Development Plan and Emerging Development Plan policies

- 2.1 The adopted Development Plan for the area is the Mid Suffolk Core Strategy (2008) and the Mid Suffolk Core Strategy Focussed Review (2012) and the saved policies of the Mid Suffolk Local Plan (1998).
- 2.2 The replacement for the Core Strategy – the Babergh Mid Suffolk Joint Local Plan – Pre-Submission Version (Regulation 19) was published for consultation on 12th November 2020 and the end of the consultation is 24th December 2020. The Needham Market Neighbourhood Plan was submitted to Mid Suffolk on 11th November 2020 and the Regulation 16 Consultation period is due to end on the 27th January 2021.

- 2.3 The application site is designated as countryside and lies outside the defined settlement boundary of Needham Market. The Adopted Development Plan policies seek to restrict residential development in the countryside as set out in Core Strategy policies CS1 and CS2 which state that only development for rural exception housing will be permitted. The proposal includes both open market and affordable housing and does not represent a rural exception site for the purposes of the Core Strategy, Therefore, the erection of up to 279 dwellings on the site would be directly contrary to the adopted development plan.
- 2.4 As noted earlier, a previous outline application for 152 dwellings was refused in 2017. At the time, the District Council could not demonstrate a 5-year housing land supply and therefore the “tilted balance” approach outlined in the National Planning Policy Framework (NPPF) paragraph 11 (d) i. was engaged. Paragraph 11 d) requires that where there are no relevant development plan policies or the policies that are most important for determining the application are out-of-date, that planning permission should be granted unless policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF when taken as a whole. The District Council felt that due to a shortfall in the housing supply that they could not refuse the application on the grounds that the development fell outside the settlement boundary and in the countryside. Now there are a Local Plan and a Neighbourhood Plan emerging and at an advanced stage, there are additional grounds for considering refusal of the current application.
- 2.5 Mid Suffolk District Council’s most recent Annual Monitoring Report was published as a supporting document to the Pre-Submission Version of the Joint Local Plan (2020) and is the most up to date position statement on the land supply issue. It indicates that Mid Suffolk has a 7.67-year supply of adequate housing land against the five-year requirement with a surplus of housing across the district of over 1,500 homes. Given that Mid Suffolk can demonstrate a five-year supply of housing in accordance with the NPPF, adequate housing can be achieved without having to develop this site. Therefore, Mid Suffolk’s adopted policies with regards to development in the countryside outlined above are engaged. An objection to the principle of the application can be justified on these grounds.
- 2.6 In the statement that supports the application, it is suggested that despite the Council now having a 5-year land supply, that the policies are still ‘out of date’ and consequently more weight should be given to the emerging

Local Plan. This raises two issues. Firstly, as the emerging Plan is not yet adopted, the existing adopted Local Plan can be attributed some weight and is still a relevant policy consideration, which includes Policies CS1, CS2 and H7 all of which seek to restrict housing development outside of settlement boundaries and in the open countryside and therefore the application site. Secondly, if you follow the logic of the Agent and attribute more weight to the emerging Local Plan, the application is still in conflict with those policies – specifically SP03 and SP04 which seek to direct new development to locations within existing settlements boundaries or through specific allocations.

- 2.7 Table 4 of the Emerging Joint Local Plan 2020 identifies the housing requirement for Needham Market over the plan period as 512 homes. On 1st April 2018, there were outstanding planning permissions for 311 homes for Needham Market. In addition, the emerging JLP makes three specific housing allocations as outlined in Section 2 above which equates to 512 dwellings in total. The housing target for Needham Market to 2037 has already been met. There will also no doubt be other individual permissions granted for individual dwellings since the base date of the plan or other windfall sites that will come forward within the built-up area of the town over the plan period which will be added to this commitment. Whilst it is accepted that the housing requirement is a minimum figure and does not automatically preclude further development from taking place, an additional 279 units as proposed by the application results in significant additional development in Needham Market which has not been strategically allocated and puts considerable strain on the existing infrastructure of the Town.
- 2.8 In addition, the Needham Market Neighbourhood Plan makes it clear that *“The Needham Market Neighbourhood Plan does not anticipate making further allocations for new development given the high levels of outstanding commitment and the level of change that will occur as those commitments and allocations come forward during the plan period. The Neighbourhood Plan policies will instead provide guidance for applications that come forward on the sites identified in the emerging BMSJLP plus any windfall 10 sites that may come forward within the existing built-up area boundary (settlement boundary).”*
- 2.9 The proposal therefore clearly conflicts with the both the adopted and emerging planning policy that covers the area. The principle of development on this site is in clear conflict with the relevant policies for the reasons given above. As described below, there are also several other key issues which the application as proposed presents.
- 2.10 As part of the early stages of the preparation of the Neighbourhood Plan, Needham Market Town Council commissioned consultants AECOM

to prepare a Concept Framework for the long-term expansion of Needham Market. The resulting Feasibility Report proposed an expansion of the town to the west of its current location, including a relief road. The relief road aims to divert HGV traffic from the High Street and improve the streetscape quality. Congestion and parking issues in the town centre specifically the High Street having been a concern of local residents for some time.

- 2.11 The Feasibility Study was subject to extensive public and stakeholder consultation both on the principle of strategic growth and more detailed aspects of the proposed approach.
- 2.12 Following feedback from this consultation and the publication of the Preferred Options of the Babergh and Mid Suffolk Joint Local Plan in July 2019, which included a figure of just 497 homes for Needham Market up to 2036 (which was already largely committed), the Town Council decided not to proceed with the approach set out in the Feasibility Study as the level of strategic housing growth envisaged was not required at this time.
- 2.13 However, the Town Council remains acutely mindful of the need to plan for the longer term (including the next Neighbourhood Plan) and to anticipate the future growth of Needham Market beyond the current Local Plan allocations. The Town Council commissioned AECOM to set out further design guidance on how strategic growth should be planned and designed to create an attractive, sustainable, and resilient expansion of Needham Market if this is needed in the future. The aim was to assist the Town Council in positively shaping the future of Needham Market and support on-going engagement with residents, businesses, and other stakeholders on how the Town should grow in the future.
- 2.14 Both AECOM reports are supporting documents and do not have development plan status, although the Feasibility Study was the subject of public consultation. On 9th December 2020, at a meeting with Mid Suffolk Neighbourhood Plan Groups, MSDC Assistant Director, Sustainable Communities, Tom Barker stated that evidence gathered whilst preparing a Neighbourhood Plan either in the form of technical reports or public consultation results should be used by Town and Parish Councils to inform their responses to planning applications and that evidence would be treated as material in the determination of the application.
- 2.15 The application site falls within part of the overall concept framework for the long-term expansion of Needham Market. The access from Barking Road is generally consistent with the siting of the proposed primary Relief Road as shown in the concept framework and the spine road broadly follows the same route across the site. However, it is highly unlikely that

any Relief Road will be constructed within the current housing target period ending in 2037 and it would be a serious mistake to construct a large housing group up to the edge of this road too early as this would constrain the detailed siting and design of the proposed Relief Road, limiting potential access points etc. Given the amount of detail in the concept framework it is disappointing that the application does not contain better proposals for pedestrian and cycle connections both within the site itself and externally to local facilities and the town centre.

- 2.16 Whilst the primary access and route across the site proposed in the application does broadly match that of the development framework, it is important that if the District is minded, to grant approval for the application, then it should ensure the subsequent detailed application takes the suggested location of a Relief Road and associated Primary Roads, as set out in the AECOM Reports, into account.

Conclusion

It is concluded that that there are several fundamental planning policy and technical issues with the application and that it does not constitute sustainable development.

1. The site lies outside of any defined settlement boundary and within open countryside where there is a policy presumption against residential development.
2. In October 2020, Mid Suffolk District Council can demonstrate a 7.67-year housing land supply which exceeds the required 5-year.
3. The application will have a significant adverse impact on the existing highway network and on local community infrastructure.
4. The application fails to adequately address the extra demand the development will cause on highways, educational and health services infrastructure.
5. The application would only become acceptable and sustainable if the new Needham Market Relief Road were constructed, which is not likely until after 2037. The impact on the existing highway network, including in the historic core of the town, will otherwise be severely detrimental.
6. The site is not the most sustainable location for new housing, has poor accessibility and pedestrian and vehicular connections to the town and is remote from local services and facilities. Future residents would inevitably have reliance on private vehicles and the application does not propose alternative sustainable transport modes.

7. The previous refusal on the grounds of Flood risk in relation to the access on Barking Road has not been overcome and there is a clear objection to the principle of development in this location on the grounds of adequate access.
8. The Flood risk in Needham Market is increasing and therefore the additional impact of development in the proposed location should not be measured in isolation but in the context of and, from the town's perspective and experience with recently developed sites, added hard surfaces and lack of control over hard landscaping and its manifest effect.
9. There is uncertainty around the proposed and poorly located 'emergency access' on to Quinton Road and the impacts of such an access in terms of highway safety and traffic congestion have not been addressed.
10. The removal of bus routes within the residential areas of Needham Market means there is no immediate and easy access from the proposed development site available to use this mode of public transport. Consequently, this will generate increased reliance on using private vehicles for journeys, increased traffic congestion and higher levels of air pollution.
11. The application is not supported in policy terms by either the existing adopted Development Plan or the emerging Joint Local Plan 2020 or the emerging Neighbourhood Plan November 2020.
12. The site is not allocated for development in any formal planning document as there is no overriding need for the development as housing requirements for the area have been met.
13. The application does not constitute a form of sustainable development. It reflects very little empathy with the contemporary and critical necessities for use of resources, growth and consumption and therefore would add to the threat of damage to ecosystems and the well-being of current and future residents of Needham Market. There is no overriding need for an exception to be made for planning permission to be granted.

Barking Parish Council wishes to object to planning application DC/20/05046 - Land to the north west side of Barking Road Needham Market for the following reasons:

Access to the site

The access to the site is not suitable or safe. The site's junction with the B1078 is close to two fatal road crashes (2004 & 2016) and an extra 500+ vehicles plus commercial vehicles each day will increase risk. The second access is onto Bridleway 15 which is a recreational routes for dog walkers, cyclists and horse riders out of Needham Market. The bridleway leads onto Quinton Road which the buses had to stop using as they were unable to negotiate the parked cars. (Thus the residents lost their bus route.) This could make access for any emergency vehicle extremely uncertain.

Evidence – Consultee SCC Highways comment “Two access points are required - Bridleway 15 should not be considered for emergency access, the bridleway is for cycling and pedestrians. The existing bus service is not suitable for commuting purposes. SCC declared Climate Emergency and it is a 5.5 mile drive to the nearest secondary school.

Flood risk

Building on and close to flood risk areas will cause problems. The slope of the site and hard surfaces will naturally guide water down towards the flood plain that Needham Market sits in and down towards the B1078. In fact, Mid Suffolk had to fund and carry out remedial work when the existing Chainhouse estate was built due to the poorly accommodated flood risk and surface water problems created by the development. Will one small lake accommodate the water ?

Evidence – Consultee Environment Agency HOLDING OBJECTION comment - flood zones 1,2 and 3 lie to the south of the site, medium and high probability zone making site a vulnerable development. The FRA undertaken does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. The FRA does not include details of the Flood Response Plan and therefore there would be an unacceptable risk to the health and safety of the occupants in a flood event.”

Traffic

The development would generate a suggested 500+ vehicle movements each day. This will cause congestion and add to poor air quality. These extra vehicles will be joining the many accessing the A14 and A140 each day under the narrow bridge that floods, is closed at least each month due to incidents thus causing people to travel to Stowmarket or Claydon to join the A14. The farthest point of the development is just over 1km from the nearest Co-op and involves walking along a narrow busy roadside that will be even busier if this development goes ahead. Most probably people will drive here – however there is only limited parking provision in Needham Market.

Trains do not go directly to London and connections to Ipswich are about one per hour. The buses are one per hour at commuting times and then half hourly. There are no buses on Sundays. Would this be sufficient provision for 279 households – probably they will rely on private cars.

Will the 1.8m wide footpaths be wide enough to accommodate cyclists through the estate to the town to encourage green transport.

Evidence – Consultee Environment Agency Air Quality Management – HOLDING OBJECTION comment“ With 500 + vehicle movements per day screening and assessment is needed. The Institute of Air Management says the development has not demonstrated the impact is reasonable, and/or manageable. Also the applicant is expected to demonstrate that the increased vehicle movements

will not significantly impact on air quality within Needham Market High Street and also demonstrate that the additional vehicle movements do not add to queues at width restricted bridge (which is the tenth most hit bridge in England,) under the Norwich/London mainline resulting in queuing traffic and resultant impacts on air quality. **Holding objection** until such a time as applicant can demonstrate the impact of the development is acceptable and/or manageable.

Waste Management comment – There could be concern that a 32 tonne RCV could manoeuvre safely around the site.

Listed Buildings

Kennels Farmhouse is close to the site and there are another eight listed buildings that would have their ancient settings affected by the development. These are set within the rolling arable fields of Barking and as you leave Needham Market and approach these houses and church the countryside sets them off. Travelling through a housing estate to approach these would entirely destroy their historical setting as in section 16 of the Local Planning Policy Framework. The cumulative impact of this development on the landscape, environment and heritage characteristics of Barking will not be appropriate to the scale and location of the proposal. Policy CS15 states there should be locally identified need. There is no evidence of this in the application and scant assistance for affordable housing.

Visual Impact

Barking's boundary will be compromised – it will erode the buffer between Barking and Needham Market. 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.

The site falls within a Special Landscape Area designated by Mid Suffolk DC as identified in the Local Planning Policy Framework with its landscape sensitivity and scenic quality. The slope of the site will increase the visibility of the development and make it more imposing.

Any building of a relief road would exacerbate the above and cause congestion not only onto the B1078 but also cause a build up of traffic turning onto Needham Market High Street from the B1078 with the resultant negative impact on air quality.

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. Spiteshall Copse is an ancient woodland is on the boundary of the development and needs protection from the intrusion.

Evidence -- Ecology Place Service HOLDING OBJECTION comment – there is insufficient information on European Protected Species : Hazel Dormouse, bats, protected species reptiles, protected farmland species as Skylark. Last survey was conducted in 2016

Agricultural Land

The site sits on grade 2 agricultural land which is of very good quality for food production – maybe a better use of land. (Source Natural England)

The following text is taken from the refusal document from 2016:

Mid Suffolk District Council as Local Planning Authority, hereby give notice that OUTLINE PLANNING PERMISSION HAS BEEN REFUSED for the development proposed in the application in accordance with the particulars and plans listed in section A for the following reasons:

1. The proposed development fails to ensure that safe and suitable access to the site can be achieved for all people having resort to a single vehicular and pedestrian access point which would be at risk of flood events and fail to ensure reasonable access or evacuation at times of flood. The development is moreover at a considerable distance from school and community facilities. On that basis the development would not represent good design and would not make the place better for residents of the locality. On that basis the development would be unacceptable having regard to paragraph 101 to 103 of the NPPF, paragraph 32 of NPPF and would fail to represent sustainable or precautionary development which would not conserve or enhance the local character of the area nor improve the economic, social or environmental conditions of the area contrary to policies FC1 and FC1.1 of the CSFR and policy CS4 of the Core Strategy.

There have been no material changes since this application and the new application for even more houses will exacerbate any such problems. Overall, the problem is the sheer scale of the development which in turn leads to a very large impact on an already enlarged town with stretched facilities. It will negatively impact on the character of the surrounding area.

As the Needham Market Society have demonstrated it is quite clear that no more houses are required by the Local Plan.

Jasmine Whyard
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2020/125659/01-L01
Your ref: DC/20/05046
Date: 01 December 2020

Dear Ms Whyard

APPLICATION FOR OUTLINE PLANNING PERMISSION (SOME MATTERS RESERVED, ACCESS TO BE CONSIDERED). TOWN AND COUNTRY PLANNING ACT 1990. - ERECTION OF 279NO DWELLINGS (INCLUDING 100 AFFORDABLE DWELLINGS) AND ACCESS.

LAND ON THE NORTH WEST SIDE OF BARKING ROAD, NEEDHAM MARKET, SUFFOLK

Thank you for your consultation dated 11 November 2020. We have reviewed the application as submitted and are raising a holding objection to the application on flood risk grounds. We also have some comments in relation to Foul Drainage that will require clarification.

Flood Risk

Whilst the majority of the site sits within Flood Zone 1, our maps show the South of the site is located in fluvial Flood Zones 2 & 3, medium & high probability zone. The proposal is for Outline Planning Permission (some matters reserved, access to be considered) for the erection of 279No dwellings (including 100 affordable dwellings) and access, which is classified as a 'more vulnerable' development, as defined in [Table 2: Flood Risk Vulnerability Classification](#) of the Planning Practice Guidance (PPG). Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests and be supported by a site specific Flood Risk Assessment (FRA).

We have not undertaken any detailed modelling for the nearby ordinary watercourse, so this source of flood risk has not been assessed for the purpose of the flood map.

The submitted flood risk assessment (FRA), undertaken by JMS, referenced EX 1807704 and dated Nov 18, does not comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change, Reference ID: 7-030-20140306. This FRA does not, therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development and we are raising a

holding objection. In particular, the submitted FRA fails to:

- Identify the impacts of fluvial flood risk from the Ordinary watercourse which joins the main river 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 of 35% and the Upper End of 65%.
- The site/access route would be flooded by unknown depths in the 1% (1 in 100) annual probability event with climate change flood event so the flood hazard on the access route is currently unknown. The FRA does not include details of a Flood Response Plan to adequately mitigate this. Consequently, there would be an unacceptable risk to the health and safety of the occupants in a flood event. Further information on this can be found in the technical appendix at the end of this letter.

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 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.

Further information in relation to flood risk can be found within the technical appendix at the end of this letter.

Foul Drainage

There is very little information on whether the site will be connected into the mains foul sewer network. The application form says 'unknown' for foul sewage drainage. Section 4.5 of the 'Flood Risk Assessment & Site Strategy' has limited information and mentions joining to the Anglian Water foul drainage network. It also mentions potential capacity issues in the network.

Assuming the foul flows will be connected into the closest WRC at Needham Market, then we currently have no concerns about capacity at this sewage works. There is plenty of capacity for this development. However early consultation with Anglian Water is essential to ensure that the sewerage network can accommodate the additional flows from the development. If this application does not propose to connect to the mains we would raise a holding objection on these grounds.

We would expect to see a statement confirming how foul drainage will be treated and some indication of consultation with Anglian Water. We trust this advice is useful.

Yours sincerely

Mr Liam Robson
Sustainable Places - Planning Advisor

Direct dial 020 8474 8923

Direct e-mail Liam.Robson@environment-agency.gov.uk

Technical Appendix

Access/Egress

It will be required to demonstrate that a safe route of access and egress can be achieved in accordance with FD2320, up to the 1% (1 in 100) annual probability with climate change flood event. Or if the applicant demonstrates that a safe route of access/egress is not possible this element could be mitigated by an acceptable emergency flood plan submitted to you that deals with matters of evacuation and refuge to demonstrate that people will not be exposed to flood hazards.

Section 5.3 of the FRA states that:-

“Safe egress from the site is required as the primary means of access is through the flood zone, as per the appended layout. As per Table 3.2 of the above document; hazard to people can be determine as a function of velocity and depth, and a low degree of flood hazard needs to be maintained in order for caution to be advised during flood events, and no higher characterisation.”

However, no further detail has been provided of how safe access will be achieved, for example the flood hazard or the height of the road above flood depths and mitigation for any potential loss of flood storage or flow routing under the road to prevent displaced flows.

We also note that the lack of safe and suitable access was a reason for refusal of a previous application of this site Planning Ref: 3506/16

Reason for Refusal

The proposed development fails to ensure that safe and suitable access to the site can be achieved for all people having resort to a single vehicular and pedestrian access point which would be at risk of flood events and fail to ensure reasonable access or evacuation at times of flood.

Achievable safe access for this site needs to be determined at Outline stage. Consideration should be given to whether it is appropriate to direct the access and egress route towards the area at highest risk of flooding. The flood depths through which the access road crosses are unknown, as the watercourse is not modelled, therefore modelling should be undertaken. The modelling should ensure that a blockage of the culvert at the southeast of the site is considered.

Modelling Guidance

When reviewing the site masterplan – Drawing 043-18-0200_p2-needham market masterplan, we note that some of the plots to the far South East may fall within the floodplain. The floodplain depicted within this FRA does not seem to be an accurate representation of our Flood Zone Maps and Flood Zone 3. The extent on the drawing in the FRA is not based upon any depths nor compared to topography. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk.

JFLOW

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

was improved more recently, using a more detailed terrain model for the area. This modelling is not a detailed local 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, for the watercourse, in order to inform the design for the site. Without this information, the risk to the development from fluvial flooding associated with the ordinary watercourse is unknown.

In order to have fully considered all forms of flooding and their influence on the site, it will be necessary to identify the fluvial flood risk. Fluvial flood levels will be required for the main river to the South of the site. It may be appropriate to undertake some flow analysis such as FEH and 1D modelling to establish the level. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk.

We advise that modelling should be undertaken to accurately establish the risk to the proposed development 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, 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.

Some areas of land within the site are likely to be subject to a higher risk of flooding than other areas within the site and an understanding of the susceptibility/vulnerability of land to flooding should be delivered through flood modelling and risk assessment in order to influence the layout of housing areas to avoid siting housing on areas of land that are susceptible to higher chances of flooding. This will allow a sequential “risk-based” approach to be applied to development within the site as directed by the National Planning Policy Framework.

Please refer to the attached documents:

- 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 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)).

Paragraph 163 of the NPPF states:-

“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and

exception tests, as applicable) it can be demonstrated that:

1. within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different locations;
2. the development is appropriately flood resistant and resilient;
3. it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
4. any residual risk can be safely managed; and
5. safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Flood Risk Climate Change Guidance: Detailed Allowance

Climate change allowances have changed recently. The Planning Practice Guidance provides advice on what is considered to be the [lifetime of the development in the context of flood risk and coastal change](#). Our guidance '[Flood risk assessments: climate change allowances](#)' 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.

For some development types and locations, 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 proposed development is classified as a "More Vulnerable" "Large-Major" development, and part of the site lies within Flood Zone 2/3a. This means the applicant must adopt a "detailed" assessment. A detailed assessment requires the applicant to perform detailed hydraulic modelling, through either re-running Environment Agency hydraulic models (if available) or construction of a new model by the developer. Assuming the lifetime of the development is until 2020, the allowances the applicant must apply are Higher Central (35%) and Upper End (65%)

We have undertaken some detailed flood modelling (Needham Market Flood Risk Study 2015) but this only extends to the south eastern corner of the site. You will therefore need to create your own model.

We recommend that you assess both the 35% and 65% allowances, and if possible design the development 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 LPA.

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.

Surface Water Attenuation Pond

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.

Date: 02 December 2020
Our ref: 333860
Your ref: DC/20/05046



planningblue@babberghmidsuffolk.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
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Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Whyard,

**Planning consultation: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings(including 100 affordable dwellings) and access.
Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk**

Thank you for your consultation on the above dated 11 November 2020 which was received by Natural England on the same date.

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.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would:

- damage or destroy the interest features for which Barking Woods Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required:

- high quality on-site Green Infrastructure with associated provisions, including a dedicated 'dogs-off-lead' area.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Further advice on mitigation

Suitable Accessible Natural Green Space (SANGS)

There is concern for the impacts of increased recreational pressure on Barking Woods SSSI, in particular the impacts of trampling, nutrient deposition and the disturbance of birds utilising the site. These birds are sensitive to disturbance from recreational walkers, cyclists etc. and in particular

dogs off leads. We advise that 279 dwellings in this location has the potential to increase the local population by approximately 670 people (based on 2.4 people per household) once the dwellings are occupied. Assuming the national average of 30 % of households owning dogs¹, the proposal could lead to an additional 167 dog walks per day, based on twice-daily walks. With the site in such close proximity to Barking Woods SSSI it is considered that residents are likely to use the accessible areas of woodland for undertaking regular recreational activities such as dog walking.

Natural England recommends that large developments include the provision of well-designed open space/green infrastructure that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary. The applicant may wish to consider to benchmark standards for accessible natural greenspace, the TCPA have published [Guides and Principles for Garden Communities](#), and Guide 7, Principal 9, references 40% green infrastructure as a target quantum. The [Suitable Accessible Natural Green Space \(SANGS\)](#) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in [Nature Nearby](#), including the minimum standard of 2ha informal open space within 300m of everyone's home. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi natural areas planted with a range of native species
- Circular dog walking routes of 2.7km within the site/or with links to surrounding public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

Dog owners require space to walk their dogs off lead close to home and away from traffic, once or twice per day. If the onsite green space does not give adequate dog walking provision, most owners will travel elsewhere. Well-designed GI should positively accommodate off-lead exercising of dogs, in areas where this causes the least conflict with other resident's interests such as cycling, children's play equipment, sports activities and people seeking to minimise contact with dogs. We recommend that the developer consults relevant guidance and best practice documents such as [Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value](#) and incorporates these principles within proposed application designs. A large semi-natural 'dogs-off-lead' area located on-site would contain the majority of 'dogs-off-lead' recreation on site, provide space for nature and minimise disturbance to breeding and foraging birds utilising Barking Woods SSSI.

Net gain

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. We draw your attention to Para 170, point d and Para 175, point d of the National Planning Policy Framework which states that:

Para 170: *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”.

Para 175: *“When determining planning applications, local planning authorities should apply the following principles:*

¹Based on figures obtained from *Number and ownership profiles of cats and dogs in the UK*, Jane K Murray, William J Browne, Margaret A Roberts, Amber Whitmarsh and Timothy J Gruffydd-Jones, Veterinary Record, 6 February 2010.

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity”.

Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to [Technical Note 2](#) of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into developments.

Lighting strategy

We advise that operational lighting should be designed through a lighting strategy to limit light spill to sensitive ecological receptors.

Ancient woodland, ancient and veteran trees

An undesignated area of Ancient & Semi-Natural Woodland extends from Barking Woods SSSI towards the development site (approximately 235m south west). You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected species

Natural England has produced [standing advice](#)² to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances

Sites of Special Scientific Interest

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

In addition, Natural England would advise on the following issues.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our [Discretionary Advice Service](#).

If you have any queries relating to the advice in this letter please contact me on 07768 237040.

Should the proposal change, please consult us again.

Yours faithfully

Sam Kench
Norfolk and Suffolk Team

² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Annex A: Natural England offers the following additional advice:

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)³. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

³<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).



**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Email address: planning.apps@suffolk.nhs.uk
Telephone Number – 01473 770000

Your Ref: DC/20/05046

Our Ref: IESCCG/001120/NEE

Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk, IP1 2BX

26/11/2020

Dear Sirs, Madam

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of Ipswich & East Suffolk Clinical Commissioning Group (CCG).

Background

2. The proposal comprises a development of up to 279 residential dwellings which is not part of the Joint Local Plan, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. The CCG and other health partners have worked with Babergh and Mid Suffolk District Councils Infrastructure Team on the IDP for all known developments in the local plan, this not being part of the local plan means this development is not accounted for. The CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

In addition to a primary healthcare response, the proposed development is likely to have an impact on other health and social care system providers that have been consulted as part of this healthcare impact assessment. This incorporates responses from:

- East Suffolk & North East Essex Foundation Trust
- Norfolk & Suffolk Foundation Trust (Mental Health)
- East of England Ambulance Service NHS Trust

Review of Planning Application

3. There are one GP practice within a 2km radius of the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Needs Arising From the Proposed Development

4. At the earliest stage in the planning process it is recommended that work is undertaken with Ipswich and East Suffolk CCG and Public Health England to understand the current and future dental needs of the development and surrounding areas giving consideration to the current dental provision, current oral health status of the area and predicted population growth to ensure that there is sufficient and appropriate dental services that are accessible to meet the needs of the development but also address existing gaps and inequalities.

Encourage oral health preventative advice at every opportunity when planning a development, ensuring that oral health is everybody's business, integrating this into the community and including this in the health hubs to encourage and enable residents to invest in their own oral healthcare at every stage of their life.

Health & Wellbeing Statement

As an Integrated Care System it is our ambition that every one of the one million people living in Suffolk and North East Essex is able to live as healthy a life as possible and has access to the help and treatment that they need in the right place, with good outcomes and experience of the care they receive.

Suffolk and North East Essex Integrated Care System, recognises and supports the role of planning to create healthy, inclusive communities and reduce health inequalities whilst supporting local strategies to improve health, social and cultural wellbeing for all aligned to the guidance in the NPPF section 91. The way health and care is being delivered is evolving, partly due to advances in digital technology and workforce challenges. Infrastructure changes and funds received as a result of this development may incorporate not only extensions, refurbishments, reconfigurations or new buildings but will also look to address workforce issues, allow for future digital innovations and support initiatives that prevent poor health or improve health and wellbeing.

The NHS Long term plan requires a move to increase investment in the wider health and care system and support reducing health inequalities in the population. This includes investment in primary medical, community health services, the voluntary and community sector and services provided by local authorities so to boost out of hospital care and dissolve the historic divide between primary and community health services. As such, a move to health hubs incorporating health and wellbeing teams delivering a number of primary and secondary care services including mental health professionals, are being developed. The Acute hospitals will be focussing on providing specialist treatments and will need to expand these services to cope with additional growth. Any services which do not need to be delivered in an acute setting will look to be delivered in the community, closer to people's homes.

The health impact assessment (HIA) submitted with the planning application will be used to assess the application. This HIA will be cross-referenced with local health evidence/needs assessments and commissioners/providers own strategies so to ensure that the proposal impacts positively on health and wellbeing whilst any unintended consequences arising are suitably mitigated against.

The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

Table 1: Summary of capacity position for healthcare services closest to the proposed development.

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Needham Market Country Practice	12,784	536.75	8,631	-340
Total	12,784	536.75	8,631	-340

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. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO) Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
4. Based on existing weighted list size.

5. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Needham Market Country Practice, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
6. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising

7. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
8. Assuming the above is considered in conjunction with the current application process, Ipswich and East Suffolk CCG would not wish to raise an objection to the proposed development.

9. Ipswich and East Suffolk CCG is satisfied that the basis of a request for CIL contributions is consistent with the Position Statement produced by Babergh and Mid Suffolk District Councils

Ipswich and East Suffolk 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

Jane Taylor

Senior Estates Development Manager

Ipswich and East Suffolk Clinical Commissioning Group

Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email planningliaison@anglianwater.co.uk

AW Site Reference: 166343/1/0108280

Local Planning Authority: Mid Suffolk District

Site: Land On The North West Side Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access

Planning application: DC/20/05046

Prepared by: Pre-Development Team

Date: 18 November 2020

ASSETS

Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

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

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

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 - Used Water Network

This response has been based on the following submitted documents: Flood Risk Assessment & Site Strategy dated November 2018 Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. The site strategy indicates that a pumped solution is required to drain the foul water flows from the development however, further information including the proposed peak pumped rate have not been detailed. We therefore request a condition requiring an on-site drainage strategy. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (3) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (4) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

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 in 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 - Suggested Planning Conditions

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

Used Water Sewerage Network (Section 3)

Condition Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme. Reason To prevent environmental and amenity problems arising from flooding

FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:

Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
 - Development size
 - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
 - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

Our Ref: 20_03438_P
Your Ref: DC/20/05046

16th November 2020

Dear Sir/Madam

RE: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access at Land On The North West Side Of Barking Road Needham Market Suffolk.

The site is near to the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and is within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD). Maps are available on the Board's webpages showing the Internal Drainage District (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf) as well as the wider watershed catchment (https://www.wlma.org.uk/uploads/ESIDB_Watershed.pdf).

I note that the applicant intends to discharge surface water to a watercourse within the watershed catchment of the Board's IDD. We request that this discharge is facilitated in line with [the Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

Kind Regards,

Emma

Emma Robertson
Sustainable Development Officer
Water Management Alliance



Jane Marson (Chairman) Michael Paul (Vice-Chairman)
Phil Camamile (Chief Executive)



Cert No. GB11990

Cert No. GB11991



Ms Jasmine Whyard
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582718

Our ref: **W:** P01306730

17 November 2020

Dear Ms Whyard

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND NORTH WEST OF BARKING ROAD, NEEDHAM MARKET, SUFFOLK
Application No. DC/20/05046**

Thank you for your letter of 11 November 2020 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

Andrew Northfield

Andrew Northfield
Business Officer
E-mail: andrew.northfield@HistoricEngland.org.uk



All planning enquiries should be sent to the Local Planning Authority.

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Jasmine Whyard

Dear Jasmine,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/05046

PROPOSAL: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

LOCATION: Land On The North West Side Of, Barking Road Needham Market Suffolk

ROAD CLASS:

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

A residential development in Suffolk over 100 dwellings, a Travel Plan must be submitted that provides some overarch with the highway mitigation measures identified in the Transport Assessment (dated February 2019). The submission of a Travel Plan is required under paragraphs 108, 110 and 111 of the NPPF and the "Travel Plans, Transport Assessments and Statements" section of the 2014 MHCLG Planning Practice Guidance. This is in addition to the fact that both Mid-Suffolk District Council and Suffolk County Council have declared Climate Emergencies that support the need for providing a strong package of sustainable transport measures. If the Applicant continues to challenge the need for a Travel Plan for this site, Suffolk County Council will have no issues with defending this requirement at any subsequent planning appeal if needed.

The Travel Plan that needs to be submitted in accordance with the Suffolk Travel Plan Guidance (<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>) and include strong measures to encourage the residents to travel by sustainable and active modes of transport. Suffolk County Council will expect measures in the Travel Plan that provide residents detailed sustainable travel information through travel information packs, with a multi-modal voucher to the value of two one month bus tickets per dwelling, with further marketing measures to encourage sustainable travel through social media or newsletters following on from the delivery of the travel information packs. The Travel Plan must also include strong commitments to engage with the catchment primary and secondary schools following the success of this measure on other Travel Plan sites in Suffolk.

The Travel Plan and Transport Assessment will also need to demonstrate if further sustainable measures can be identified secured in accordance with the requirements of paragraph 108 of the NPPF, as the existing bus services in the immediate area are not suitable for commuting purposes. It is over a 700m walk from the edge of the site to the nearest bus stop that has frequent bus services (First 88). Evidence of discussions with the local bus operators to investigate any potential improvements to the public transport links must be incorporated into the Travel Plan.

If a suitable Travel Plan can be submitted, Suffolk County Council would be willing to take on the delivery of the Travel Plan on behalf of the developer if a Travel Plan Contribution of £107,965 (£386.97 per dwelling) is secured through a Section 106 agreement. This will need to be agreed in writing by the Applicant before the application can be determined. If this cannot be agreed a suitable planning condition with a £1,000 per annum Travel Plan Evaluation and Support Section 106 contribution will need to be made payable to Suffolk County Council for a minimum of five years, or one year after occupation of the final dwelling (whichever is the longest duration). This will need to be required to ensure Suffolk County Council can provide the officer time to oversee the delivery of the Travel Plan, as this is a discretionary function and chargeable under section 93 of the 2003 Local Government Act and section 3 of the 2011 Localism Act.

The proposed access is on the extent of the 30mph speed limit. The developer is suggesting extending the speed limit by 24m. We recommend the limit is extended approximately 100m to ensure the development frontage is within the speed limit.

On receipt of the required documents, we will be able to respond to this application in full.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

All planning enquiries should be sent to the Local Planning Authority.

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Jasmine Whyard

Dear Jasmine

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/05046

PROPOSAL: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

LOCATION: Land On The North West Side Of, Barking Road Needham Market Suffolk

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

Further to SCC highways response on this application, SCC has carried out further investigation into the site following comments raised by the planner.

Access

As previously mentioned, the site is only providing a single access into the site. This is unacceptable for a development with over 150 dwellings. It has been highlighted that the access point is within the medium flood zone. In the event Barking Road flooding at this access point, there will be no vehicular access for the site. We have a history of customer complaints on file where the road has flooded in the past and vehicles were unable to pass. Therefore, there needs to be 2 permanent points of access; one of which is not in the floodplain. We cannot accept a single access with an emergency access point for this site due to the flooding issue.

It is unclear the development has vehicular rights of way for the proposed emergency access onto Bridleway 15 along the Drift to allow access to Quinton Road. Full details are required on this proposal (how the bridleway is affected including design, dimensions etc).

Highway Capacity

The Transport Assessment (TA) document supporting this application assessed the junctions within Needham Market by applying the trips from the development to the existing highway layout, the Ratio of Flow to Capacity (RFC) and Queue lengths (Q) were calculated on the key junctions for future year 2024. By using the computer Model PICADY, these predictions can be calculated for the AM and PM

Peak Hours at junctions. Note If the RFC value is 0.85 or less, this indicates the junction is nearing but operating within capacity, 1 being at capacity and more than 1, over capacity.

- Table 10 gives the PICADY results for B1113/Grinstead Hill/Lion Lane junction and predicts the RFC for the future year to be 0.7 in the AM peak hour which is within theoretical capacity.
- Table 11 indicates The B1113/B1078 Barking Road junction shows the RFC during the PM peak as 0.83. Again, this is within the theoretical capacity. However, the TA does not indicate the BMSDC's emerging Joint Local Plan has been included in the junction modelling.

Pedestrian and Cycle Links

A concern has been raised regarding the footway links from the site into Needham Market. We can confirm that Drawing No 1901-305-SK01 (on Page 35 of the Transport Assessment) indicates a proposal to construct a short section shared cycle/footway 3m wide along the northern frontage of the site then a 1.8m wide footway adjacent to Needham Market Country Practice. These will link the site to the footway to the shops on Barking Road and beyond. This is an acceptable proposal to create a continuous link for the pedestrian. However, the following points need to be addressed:

- It is noted the existing footway widths vary on Barking Road; between approximately 1.2m and 1.8m. Manual for Streets (MfS) indicate the minimum unobstructed width for pedestrians should be 2m. It also states, 'Additional width should be considered between the footway and a heavily used carriageway'. MfS Also states 'Footway widths can be varied between different streets to take account of pedestrian volumes and composition'. Volumes of pedestrians will vary throughout the day along this stretch of footway and the existing widths could be appropriate for the expected pedestrian flows. It should be noted that Barking Road is on the B1078 and part of the Strategic highway network and SCC has received complaints regarding the speeds of vehicles along this road, so the pedestrian is at risk from fast moving vehicles.
- Local Transport Note 1/20 was published in July of this year where 'cycling will play a far bigger part in our transport system from now on'. It also states 'This updated national guidance for highway authorities and designers aims to help cycling become a form of mass transit in many more places. Cycling must no longer be treated as marginal, or an afterthought'.

We recommend the applicant investigates on how they can provide wider footways along Barking Road and outline their proposal on how they envisage introducing provisions for the cyclist.

We note the developer is proposing to link to the Bridleway to the north of the site which links to the footway network off Quinton Road and onto the Primary School; we consider this is a safe route for the vulnerable pedestrian.

There is insufficient evidence to show that any mitigation proposal would adequately address the severe impact from the above points. For this reason, SCC would recommend that planning permission is refused on highway grounds. Should further improvements be proposed to adequately address the highway safety matters, we would be happy to re-consider our position on the proposal.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Your ref: DC/20/05046
 Our ref: 60097
 Date: 27 November 2020
 Enquiries to: Peter Freer
 Tel: 01473 264801
 Email: peter.freer@suffolk.gov.uk

By e-mail only:
planningblue@babberghmidsuffolk.gov.uk

FAO Jasmine Whyard

Dear Jasmine,

Re: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279 No dwellings (including 100 affordable dwellings) and access. Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Summary Table – CIL contributions

The table below would form the basis of a future bid to the District Council for CIL funds if planning permission is granted and implemented.

Service Requirement	Contribution per dwelling	Capital Contribution
Education - Primary	£4,146.80	£1,156,956.00
Education – Secondary	£4,090.32	£1,141,200.00
Education – Sixth Form	£852.15	£237,750.00
Libraries	£216.00	£60,264.00
Waste	£136.00	£37,944.00
Total	£9,441.27	£2,634,114.00

Summary Table – S106 contributions

The table below should be secured by a planning obligation if planning permission is to be granted. Justification is identified in the proceeding sections of this letter. Please see section 13 for SCC's monitoring fee.

Service Requirement	Contribution per dwelling	Capital Contribution
New Early Years Setting build cost	£1,837.63	£512,700.00
Early Years land		£1
Secondary school transport contribution	£1,036.56	£289,200.00
Total	£2,874.19	£801,901.00

The National Planning Policy Framework (NPPF) paragraph 56 sets out the requirements

of planning obligations, which are that they must be:

- 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.

The county council 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:

- 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.

The District Council is out for consultation from the 12th November with its pre-submission [Local Plan](#) which will need to be considered and this site is not proposed to be allocated.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and charges CIL on planning permissions granted after 11 April 2016

Mid Suffolk District Council have produced a position statement for the area which includes a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. This will be superseded by the Infrastructure Funding Statement to be published 31st December 2020. The current position statement is dated 1st September 2019. This will be superseded by the district's Infrastructure Funding Statement.

The county council and the District Council have a shared approach to calculating infrastructure needs, in the adopted [Developers Guide to Infrastructure Contributions in Suffolk](#).

The details of the impact on local infrastructure serving the development is set out below and will form the basis of developer contributions funding:

1. Education. Paragraph 94 of the NPPF states: ‘It is important 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. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.’

Furthermore, the NPPF at paragraph 104 states: ‘Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;’

The Department for Education (DfE) publication ‘Securing developer contributions for education’ (November 2019), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised September 2019]. Paragraph 19 of the DfE guidance states, “We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including temporary education needs where relevant, such as temporary school provision and any associated school transport costs before a permanent new school opens within a development site.”

In paragraph 15 of the DfE guidance ‘Securing developer contributions for education’ it says, “We advise that you base the assumed cost of mainstream school places on national average costs published annually in the DfE school place scorecards. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the national average to reflect the costs in your region, using BCIS location factors”.

SCC would anticipate the following minimum pupil yields from this development based on the indicative housing mix:

School level	Minimum pupil yield:	Required:	Cost per place £ (2020):
Primary school	67	67	17,268

age range, 5-11:			
Secondary school age range, 11-16:	48	48	23,775
Secondary school age range, 16+:	10	10	23,775

Total education contributions:	£2,535,906.00
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The local catchment schools are Bosmere County Primary School, and Stowmarket High School.

Primary School

The strategy at primary school level is to expand the existing school up to 420-places. At the secondary school level, construction work started on site during the October half term 2018, with phase one due to complete around Easter 2020; the second phase is the demolition of the existing building which should be completed by the summer holidays 2020.

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for primary schools is £17,268 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£17,268 / 1.00) produces a total of £17,268 per pupil for permanent expansion of primary schools.

Secondary School/Sixth Form

The strategy at the secondary school level is to expand the existing school in the future after the recent EFA building project is completed.

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for secondary schools is £23,775 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£23,775 / 1) produces a total of £23,775 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, “further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place”.

Secondary School – transport contributions

SCC require secondary school transport S106 contributions as the development is

over 3 miles walking distance to the nearest Secondary School. This is an additional cost to SCC as the development is not located within statutory walking distance of a Secondary School and SCC will have responsibilities to provide 'free' home to school transport for secondary pupils on an ongoing basis for the life of the development.

Our approach to school transport cost is directly related to the number of children likely to be living in the dwellings and is set out in the final section on page 2 of the "[update on developer contribution costs for early years and education](#)", published on the SCC Developers Guide to Infrastructure Contributions in Suffolk webpage. On average the current cost (May 2020) of transporting a school pupil from home to school is £6.34 per day (return) or £1,205 per annum. The calculation of school transport contributions is based on 190 days per year over 5 years for secondary school pupils.

48 secondary-age pupils are forecast to arise from the proposed development. Developer contributions are sought to fund school transport provision for a minimum of five years for secondary-age pupils. Therefore, contributions of £1,205 x 48 pupils x 5 years = £289,200, increased by the RPI. Contribution held for a minimum period of 10 years from date of the final dwelling occupation. The contribution will be used for secondary school transport costs.

The securing of a School Transport Contribution by the approaches as set out above have been confirmed in appeal decisions, as a matter of principle, to be compliant with Regulation 122 of the CIL Regulations. Decision examples include (Planning Inspectorate 7 digit case reference numbers): 3179674, 3161733, 3182192, and 3173352.

2. Pre-school provision. Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision and all children in England receive 15 free hours free childcare. Through the Childcare Act 2016, from September 2017 families of 3 and 4 year olds may now be able to claim up to 30 hours a week of free childcare.

This proposed development is in the Bosmere ward, where there is an existing deficit of places. Existing provision is unable to be expanded to provide the number of places arising from the development as well as undetermined applications in the

ward.

As per the [Developers Guide to Infrastructure Contributions in Suffolk](#), where a development proposal is anticipated to create over 20 FTE places, then a new provision should be secured. This will include the land and the construction of suitable premises for a new provision.

In paragraph 16 of the DfE guidance it says, “Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school”.

The strategy for early years’ provision would be to provide a new on-site setting.

- It is forecast that up to 44 children ages 2 – 4 will arise, which is the equivalent to 25 FTE places based on one place being 30 hours per week.
- Due to the number of developments emerging in the ward the existing settings are unable to expand to cater for these places arising and the existing deficit.
- A site area large enough to deliver a 60 place setting will be required to futureproof the setting so a minimum site area of 0.1 hectares. It is proposed that a land reservation is secured within the planning obligation for a flat, fully-serviced and free of contamination site to be transferred to SCC for £1 – the exact location to be identified at the reserved matters stage after consideration has been given to any constraints. Land to be used for early years purposes and transferred to SCC prior to first dwelling occupation.
- Planning obligation – financial contribution of £1,837.63 per dwelling for SCC to use towards the delivery of a new early years setting for Needham Market, plus freehold transfer of a fully-serviced site of minimum size 0.1 ha to SCC for £1.

From this development proposal SCC would anticipate the following pre-school places arising:

	Minimum number of eligible children:	Required:	Cost per place £ (2020):
Pre-School age range, 2-4:	25	25	20,508

Required pre-school contributions:	£512,700.00
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3. **Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.
4. **Transport issues.** Refer to the NPPF 'Section 9 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Samantha Harvey will coordinate this.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated 2019).

5. **Libraries.** Refer to the NPPF Section 8: 'Promoting healthy and safe communities'.

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (3 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

This equals a cost of £216.00 per dwelling for the support of improving services and outreach at Needham Market Library.

Libraries contribution:	£60,264.00
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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.

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.

A contribution will be required through the Community Infrastructure Levy towards the relocation of Stowmarket Recycling Centre, which serves this development at £136 / dwelling. A contribution as set out below is required from the proposed development.

Waste contribution:	£37,944.00
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- 7. Supported Housing.** Section 5 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, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

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 LPAs housing team to identify local housing needs.

- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.'

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

9. Fire Service. Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for firefighting which will allow SCC to make final consultations at the planning stage.

10. High-speed broadband. This should be considered as part of the requirements of the NPPF Section 10 'Supporting high quality communication'. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

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

11. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs associated with work on a S106A, whether or not the matter proceeds to completion.

12. Time Limit. The above information is time-limited for 6 months only from the date of this letter.

13. Monitoring fee. The CIL Regs allow for charging of monitoring fees. In this respect the county council charges **£412** for each trigger point in a planning obligation, payable upon commencement.

14. Future CIL Bids. The above infrastructure identified as CIL funded, as opposed to those identified for s106 contributions, will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented. Applications for CIL funding will use the latest cost multipliers at the time of bidding. CIL cuts the link from the development to the infrastructure and it's important to remember that some areas of the district will generate a lot of CIL but will have little infrastructure to deliver due to capacity, so the pot should be seen as district wide rather than little pots covering each development area.

Yours sincerely,

PJ Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer

2020-11-17 JS Reply Land On The North West Side Of, Barking Road, Needham Market Ref DC/20/05046

Dear Jasmine Whyard,

Subject: Land On The North West Side Of, Barking Road, Needham Market Ref DC/20/05046

Suffolk County Council, Flood and Water Management have reviewed application ref DC/20/05046.

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Flood Risk Assessment and Drainage Strategy Ref EX1807704
- Needham Market Site Location Plan Ref 043-18-0150 P1
- Needham Market Masterplan Ref043-18-0200 P2

Document Submitted	Document Description	Outline
Flood Risk Assessment (FZ3 or Site >1Ha)	Evaluation of flood risk (fluvial, pluvial & groundwater) to the site – will guide layout and location of open spaces. (SCC may require modelling of ordinary watercourse if EA Flood Maps not available)	✓
Drainage Strategy/Statement (less detail required for Outline)	Document that explains how the site is to be drained using SuDS principles. Shall include information on:- <ul style="list-style-type: none"> • Existing drainage (inc adjacent roads) • Impermeable Area (Pre and Post Development) • Proposed SuDS • Hydraulic Calculations (see below) • Treatment Design (i.e. interception, pollution indices) • Adoption/Maintenance Details • Exceedance Paths 	✓
Contour Plan	Assessment of topography/flow paths/blue corridors	✓
Impermeable Areas Plan	Plan to illustrate new impervious surfaces	✓
Preliminary Layout Drawings (including landscaping details)	Indicative drawings of layout, properties, open space and drainage infrastructure including:- <ul style="list-style-type: none"> • Discharge location (outfall) • Conveyance network • Form of SuDS and location on the site 	✓
Preliminary Site Investigation Report	3 or more trial pits to BRE 365 and associated exploratory logs (check for groundwater)	✓
Preliminary hydraulic calculations	<ul style="list-style-type: none"> • Discharge Rates (using suitable method i.e. FEH, IH124 (ICPSUDS) or modified rational method (brownfield sites) • Storage Volume • Long Term Storage (if required) 	✓

Evidence of any third party agreements to discharge to their system (i.e. Anglian Water agreement or adjacent landowner)	Evidence of any permissions or permits being obtained.	✓
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The reason why we are recommending a holding objection is because the submitted information relating to flood risk and surface water drainage needs to be updated to reflect changes to national and local policy.

Also the predicted flood maps will need to be checked and amended as necessary as new data was released in January 2020 to flood risk mapping.

The points below detail the action required in order to overcome our current objection:-

1. Update the Flood Risk Assessment and Drainage Strategy Ref EX1807704 as necessary for changes to
 - a. national, local policy/guidance
 - b. predicted flood risk maps
 - c. reduction in the proposed development and proposed development layout/masterplan
 - d. updated hydraulic calculation
2. Ensure the following documents have been provided;
- 3.

Kind Regards

Jason Skilton
 Flood & Water Engineer
 Suffolk County Council
 Growth, Highway & Infrastructure
 Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

From: GHI PROW Planning <PROWplanning@suffolk.gov.uk>

Sent: 17 November 2020 10:27

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: David Falk <david.falk@suffolk.gov.uk>; Kevin Verlander <Kevin.Verlander@suffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/20/05046 (Land north-west of Barking Rd, Needham Mkt)

PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE

REF: Land north-west of Barking Road, Needham Market – DC/20/05046

Thank you for your consultation concerning the above application.

The proposed site itself does not contain any public rights of way (PROW), however Bridleway 15 Needham Market runs outside the northern edge of the site. The Definitive Map for Needham Market can be seen at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Needham-Market.pdf>. A more detailed plot of public rights of way can be provided. Please contact DefinitiveMaps@suffolk.gov.uk for more information. Note, there is a fee for this service.

We accept this proposal in principle, however we would like to see a pedestrian / cycle link from the north-eastern corner of the site onto BR15. This would allow sustainable access to the library, community centre and on into town. It is likely there will be a requirement to enhance the PROW network relating to this development, and if this is the case, a separate response will contain any further information.

The Applicant MUST take the following into account:

1. PROW are divided into the following classifications:
 - Public Footpath – only for use on foot or with a mobility vehicle
 - Public Bridleway – use as per a public footpath, and on horseback or by bicycle
 - Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, e.g. a horse and carriage
 - Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

All currently recorded PROW are shown on the Definitive Map and described in the Definitive Statement (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact DefinitiveMaps@suffolk.gov.uk.

2. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of

any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

3. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It **DOES NOT** give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
 - To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. **PLEASE NOTE** that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
 - To discuss applying for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
 - To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> **PLEASE NOTE** that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
4. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
5. Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

In the experience of the County Council, early contact with the relevant PROW officer avoids problems later on, when they may be more time consuming and expensive for the applicant to address. More information about Public Rights of Way can be found at www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/

Thank you for taking the time to consider this response.

Public Rights of Way Team

Growth, Highways and Infrastructure
Suffolk County Council
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP
PROWplanning@suffolk.gov.uk

-----Original Message-----

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>
Sent: 11 November 2020 16:38
To: GHI PROW Planning <PROWplanning@suffolk.gov.uk>
Subject: MSDC Planning Consultation Request - DC/20/05046 (Land north-west of Barking Rd, Needham Mkt)

Please find attached planning consultation request letter relating to planning application - DC/20/05046 - Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

From: GHI PROW Planning <PROWplanning@suffolk.gov.uk>
Sent: 29 January 2021 18:31
To: Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>
Cc: Sam Harvey <Sam.Harvey@suffolk.gov.uk>; David Falk <david.falk@suffolk.gov.uk>
Subject: RE: Application - Needham Market, land on the North West side of Barking Road IP6 8JF

Hi Jasmine

We would not support use of Bridleway 15 Needham Market (The Drift) as an emergency access to / from the proposed development site. The point where the Applicant is proposing to bring the access out is currently unsurfaced and slopes steeply upwards. We do not feel that they will be able to get enough width to make a safe access / egress point, even if it's just for emergencies. The section at the north-eastern corner of the site is currently surfaced as it appears to be used by the football club, but the bridleway section is only 5 metres wide. In addition, the section of road that the bridleway connects to is only about 4 metres wide. This route is not suitable to be used as an emergency access that could see hundreds of journeys in the event that the Barking Road access is unusable. Even if the muddy section of BR15 was to be surfaced, in our view it is not wide enough, and use as an access would significantly interfere and potentially endanger, other users of the bridleway. We would also question how use of BR15 is going to be restricted to emergencies only. Unless there is some sort of barrier there, we have a concern it would just be used as a normal access by people living at that end of the development. In light of the above, we would strongly support a refusal recommendation.

Kind regards

Alex

Alexandra Maher
Green Access Officer

Rights of Way and Access Team
Suffolk County Council
Phoenix House, 3 Goddard Road, Ipswich, IP1 5NP
Tel: 01473 264769
Mobile: 07543 237698

www.suffolk.gov.uk
www.discoversuffolk.org.uk
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www.instagram.com/DiscoverSuffolk



Mid Suffolk District Council
Planning Department
Endeavour House
Russell Road
Ipswich
IP1 2BX

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

Your Ref:
Our Ref: FS/F216294
Enquiries to: Water Officer
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 13/11/2020

Dear Sirs

Land on the North West side of Barking Road, Needham Market
Planning Application No: DC/20/05046/OUT
A CONDITION IS REQUIRED FOR FIRE HYDRANTS
(see our required conditions)

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), 2019 Edition, 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, 2019 Edition.

Water Supplies

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

/continued

Sprinklers Advised

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 or appointed Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: jason@parkerplanningservices.co.uk

Enc: Sprinkler information

Mid Suffolk District Council
Planning Department
Endeavour House
Russell Road
Ipswich
IP1 2BX

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

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

Date: 13 November 2020

Planning Ref: DC/20/05046/OUT

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land on North West side of Barking Road, Needham Market
DESCRIPTION: 279 Dwellings
HYDRANTS REQUIRED

If the Planning Authority is minded to grant approval, the Fire Authority require 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, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.

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/

OFFICIAL

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Created: September 2015

Enquiries to: Fire Business Support Team
Tel: 01473 260588
Email: Fire.BusinessSupport@suffolk.gov.uk



Dear Sir/Madam

Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

Dispelling the Myths of Automatic Fire Sprinklers

- Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.
- Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.
- An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.
- Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

Promoting the Benefits of Automatic Fire Sprinklers

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.
- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.

OFFICIAL

- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

The Next Step

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully

Chief Fire Officer
Suffolk Fire and Rescue Service

Hi Jasmine,

Thank you for consulting Suffolk Minerals and Waste Planning department on application DC/20/05046.

This proposal sits within the Minerals Safeguarding Area, outlined in Policy MP10: Minerals consultation and safeguarding areas and associated maps.

This Proposal is also 16.48 Ha which is above the 5Ha threshold for safeguarded areas as outlined in Policy MP10: Minerals Consultation and safeguarding areas.

For this development we would ask that a 'Borehole and grading analysis' be carried out on the site, if material is found on site and it is deemed to be economical viable for extraction we would ask this material is extracted prior to commencement.

If some material is found and it is economically viable for use within the project we would ask for the material to be used on site in the proposed development.

Please do give me a call if you need to discuss further.

Kind Regards

Ross Walker.

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

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich IP1 2BX

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

Our Ref: 2020_05046
Date: 12th November 2020

For the Attention of Jasmine Whyard

Dear Mr Isbell

Planning Application DC/20/05046 – Land on the north west side of Barking Road, Needham Market: Archaeology

This large proposal affects an area of high potential recorded in the County Historic Environment Record. Within the site itself, finds scatters dating from the Bronze Age to the post-medieval period have been recorded. Low-level evaluation in the southern part of the field has identified post medieval features relating to the remains of Sprites Hall, shown on historic maps to have once stood within this site, and also a number of prehistoric features (NDM 042). 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 further archaeological remains at this location and the proposed development will involve groundworks which will damage or destroy surviving archaeology.

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 199), 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 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 part 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.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, a second phase of archaeological evaluation (consisting of geophysical survey and trial trenching of the northern part of the application area, as well as further trenching in the southern part of the application area) is required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <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

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

To: Jasmine Whyard - Planning Officer
From: Louise Barker – Acting Strategic Housing Team Manager
Date: 7th December 2020

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land on The North West Side Of, Barking Road, Needham Market, Suffolk

Key Points

1. Background Information

This is a major development proposal for 279 residential dwellings. This application triggers the requirement for an affordable housing contribution of 35% under local policy.

This equates to 97.65 affordable dwellings. The scheme proposes 100 affordable dwellings.

2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for **127 new affordable homes per annum**.

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

- The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.
- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years

3. Proposed Mix for Open Market homes.

3.1 Detail has been provided on the housing mix which is shown in the accommodation plan 043-18-0300. Whilst it provides a broad range of house types and bedroom sizes, the current proposals for 112 x 3 bedrooms and 26 x 2 bedroom is not acceptable and needs further consideration to take account of the above information in the table below from the Ipswich Housing Market Area - Strategic Housing Market Assessment (updated 2019) page 37 produced by Peter Brett Associates.

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

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

3.2. The number of 3 bedrooms should be reduced and the 2 bedrooms increased. Smaller homes are more affordable for first time buyers and suitable for those wishing to downsize. Furthermore it would be useful to understand how the housing mix has been determined. A meeting with the agent/applicant would be useful to discuss the above points.

4. Preferred mix for Affordable Housing

4.1 The accommodation plan shows 100 of the proposed dwellings on the development are offered for affordable housing. Policy requirement is for 35% which equates to 97.65. The affordable housing on this site would be for district wide need. The current registered housing need shows the majority of homes required are 1 and 2 beds with a smaller need for 3+ bedrooms.

The affordable housing is offered as:

1 bed flat x 6
2 bed flat x 12
2bed bungalow x 12
3 bed bungalow x 7
2 bed x 38
3 bed x 21
4bed x 4

4.2 The above mix is broadly acceptable, but we require further clarification on size, number of occupants and tenure. We recommend 75% affordable rent and 25% shared ownership. We also require confirmation that the homes meet NDSS.

4.3 The layout proposes the affordable homes to be 'pepper potted' throughout the development which is acceptable.

4.4 We would expect to see level access showers in any ground floor flatted accommodation and the affordable homes built in accordance with Building Regulations Part M 'Category M4(2)' standard.

5. Other requirements for affordable homes:

- Properties must be built to current Homes England requirements and meet the NDSS requirements.
- The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 100% of relets.
- The affordable units to be constructed 'tenure blind' and must not be in clusters of more than 15 dwellings.
- All flats must be in separate blocks and capable of freehold transfer to an RP.
- Adequate parking and cycle storage provision is made for the affordable housing units.

Summary:

We are broadly supportive of the affordable housing mix but require further clarification as stated above. We do not support the open market mix as proposed and recommend a change to the numbers of 2 and 3 beds as described above.

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
Sent: 01 December 2020 08:50
To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: DC/20/05046. Air Quality

Dear Jasmine

EP Reference : 283706
DC/20/05046. Air Quality
Land On The North West Side Of, Barking Road, Needham Market, IPSWICH, Suffolk.
Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. Erection of 279No dwellings (including 100 affordable dwellings) and access.

Many thanks for your request for comments in relation to the above application. I can confirm that based on the scale of the development it would be reasonable to expect that the development would be accompanied by an air quality impact assessment. The scale of the development at 279 dwellings is likely to generate more than 500 vehicle movements a day which is indicative of the need for a screening assessment when placed against guidance from the Institute of Air Quality Management. Currently the development has not demonstrated that the impact is reasonable and/or manageable. For this development I would expect that the applicant demonstrates that the increased vehicle movements will not significantly impact on air quality within Needham High Street and key junctions around the town – I would also expect that the the applicant should demonstrate that the additional vehicle movements do not add to the queues at the width restricted bridge under the Norwich-London mainline resulting in queuing traffic and resultant impacts on air quality. I would raise a holding objection until such time that the applicant demonstrates that the impact of the development is acceptable and/or manageable.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk
Work: 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 27 November 2020 08:57
To: Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>
Subject: DC/20/05046. Land Contamination

Dear Jasmine

EP Reference : 283707

DC/20/05046. Land Contamination

Land On The North West Side Of, Barking Road, Needham Market, IPSWICH, Suffolk.

Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. Erection of 279No dwellings (including 100 affordable dwellings) and access.

Many thanks for your request for comments in relation to the above application. Having reviewed the application and supporting Phase I report by RSA Geotechnics (reference ; 1433351 – Report, AJH, PAG, LHA – 13-01-16 Ver.1) I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk

Work: 01449 724715

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



Minimum requirements for dealing with unexpected ground conditions being encountered during construction.

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

From: Peter Chisnall <Peter.Chisnall@babberghmidsuffolk.gov.uk>
Sent: 26 November 2020 21:37
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: DC/20/05046

Dear Jasmine,

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Many thanks for your request to comment on the sustainability/Climate Change aspects of this application.

It is acknowledged that the application is for outline permission however some consideration of this topic area is expected at this stage.

Babergh and Mid Suffolk Councils declared a Climate Emergency in 2019 and have an aspiration to be Carbon Neutral by 2030, this will include encouraging activities, developments and organisations in the district to adopt a similar policy. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability, taking into account the requirements to mitigate and adapt to future climate change.

I raise no objections to this application. If the planning department decided to set conditions on the application, I would recommend the following.

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

The Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day).

For developments constructed with levels of insulation to just equal or slightly better the current building regulations' Part L requirements it is likely that they will need to be retrofitted within a few years to meet the National milestones and targets leading up to zero carbon emissions by 2050.

The Sustainability and Energy Strategy requires the applicant to indicate the retrofit measures and to include an estimate of the retrofit costs for the properties on the development to achieve net Zero Carbon emissions by 2050. It is also to include the percentage uplift to building cost if those measures are included now at the initial building stage.

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Clear commitments and minimum standards should be declared and phrases such as 'where possible, subject to, where feasible' must not be used.

Evidence should be included where appropriate demonstrating the applicants previous good work and standards achieved in areas such as site waste management, eg what recycling rate has the applicant achieved in recent projects to show that their % recycling rate commitment is likely.

Details as to the provision for electric vehicles should also be included please see the Suffolk Guidance for Parking, published on the SCC website on the link below:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmentalmanagement/planningrequirements/>

Regards,

Peter

Peter Chisnall, CEnv, MIEMA, CEnvH, MCIEH
Environmental Management Officer

From: Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>

Sent: 18 November 2020 14:17

To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Subject: DC/20/05046

WK 283709

Environmental Health -
Noise/Odour/Light/Smoke

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Thank you for consulting me on this application. Environmental Protection have no objections in principle. However, demolition and construction activities have the potential to cause an adverse impact on existing residential and commercial units in the vicinity please add the following conditions:

1. The hours of operation on site shall be limited to:
Monday to Friday: 08:00 to 18:00
Saturday: 08:00 to 13:00
Bank or Public Holidays: NO onsite work permitted.
2. Prior to the commencement of the development, including any demolition or site preparation works, a Construction Method Statement (CMS) shall be submitted in writing for approval. The CMS shall incorporate the following details
 - a) Details of noise and vibration control for plant and operations including monitoring on site
 - b) Details of the storage of construction materials on site, including details of their siting and maximum storage height.
 - c) Details of how construction and worker traffic and parking shall be managed.
 - d) Details of any protection measures for footpaths surrounding the site.
 - e) Details of any means of access to the site during construction.
 - f) Details of the scheduled timing/phasing of development for the overall construction period.
 - g) Details of dust control and any wheel washing to be undertaken, management and location it is intended to take place.
 - h) Details of any lighting, including position and luminance/direction.
 - i) Details of the siting of any on site compounds and portaloos.
 - j) Haul routes for construction traffic on the highway network.
 - k) Monitoring and review mechanisms.The construction shall at all times be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority.

Andy

Andy Rutson-Edwards, MCIEH AMIOA

Senior Environmental Protection Officer

Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724727

From: Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>
Sent: 20 November 2020 15:46
To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: FW: DC/20/05046 further comments

WK 283709

Environmental Health -
Noise/Odour/Light/Smoke

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be

considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Thank you for consulting me on this application. Environmental Protection have further comments to make in addition to those I submitted on 18/11/2020

Due to the location of the nearby football ground and training area, I shall require an Environmental Noise Assessment to be undertaken by a suitably qualified acoustic consultant with an agreed method . This assessment will need to take into consideration all the activities of the football club site. E.g. any licensed activities permitted in addition to those on the field and all weather 3G training pitch. I recommend that this assessment and report is undertaken and any Environmental Protection re consulted on this application prior to the determination of this application.

The existing lighting in use at the adjacent football ground shall also be assessed as this to ensure that any new residents in the proposed development are not affected by the current lighting.

Andy

Andy Rutson-Edwards, MCIEH AMIOA

Senior Environmental Protection Officer

Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724727

Email andy.rutson-edwards@baberghmidsuffolk.gov.uk

www.babergh.gov.uk www.midsuffolk.gov.uk

From: Andy Rutson-Edwards

Sent: 18 November 2020 14:17

To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Subject: DC/20/05046

WK 283709

Environmental Health -
Noise/Odour/Light/Smoke

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Thank you for consulting me on this application. Environmental Protection have no objections in principle. However, demolition and construction activities have the potential to cause an adverse impact on existing residential and commercial units in the vicinity please add the following conditions:

1. The hours of operation on site shall be limited to:
Monday to Friday: 08:00 to 18:00
Saturday: 08:00 to 13:00
Bank or Public Holidays: NO onsite work permitted.
2. Prior to the commencement of the development, including any demolition or site preparation works, a Construction Method Statement (CMS) shall be submitted in writing for approval. The CMS shall incorporate the following details
 - a) Details of noise and vibration control for plant and operations including monitoring on site
 - b) Details of the storage of construction materials on site, including details of their siting and maximum storage height.
 - c) Details of how construction and worker traffic and parking shall be managed.
 - d) Details of any protection measures for footpaths surrounding the site.
 - e) Details of any means of access to the site during construction.
 - f) Details of the scheduled timing/phasing of development for the overall construction period.
 - g) Details of dust control and any wheel washing to be undertaken, management and location it is intended to take place.
 - h) Details of any lighting, including position and luminance/direction.
 - i) Details of the siting of any on site compounds and portaloos.
 - j) Haul routes for construction traffic on the highway network.
 - k) Monitoring and review mechanisms.

The construction shall at all times be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority.

Andy

Andy Rutson-Edwards, MCIEH AMIOA

Senior Environmental Protection Officer



Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724727

Email andy.rutson-edwards@baberghmidsuffolk.gov.uk

www.babergh.gov.uk www.midsuffolk.gov.uk

Consultation Response Pro forma

1	Application Number	DC/20/05046	
2	Date of Response		
3	Responding Officer	Name:	James Fadeyi
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
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 subject to conditions	
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.	<p>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.</p> <div style="text-align: center;">  ELITE 6 - 8x4MS (Mid Steer) Wide Track Dat </div> <p>See the latest waste guidance on new developments.</p> <div style="text-align: center;">  SWP Waste Guidance v.21.docx </div> <p>The road surface and construction must be suitable for an RCV to drive on.</p> <p>To provide scale drawing of site to ensure that access around the development is suitable for refuse collection vehicles.</p> <p>Please provide plans with each of the properties bin presentations plotted, these should be at edge of the curtilage or at the end of private drive and there are suitable collection presentation points. These are required for approval.</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.

6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate	
7	Recommended conditions	Meet the conditions in the discussion.

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.

-----Original Message-----

From: BMSDC Public Realm Consultation Mailbox

<consultpublicrealm@baberghmidsuffolk.gov.uk>

Sent: 18 November 2020 16:05

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/20/05046

Public Realm Officers have no objections to this development as shown on the plans. There are generous areas of public open space indicated within the development and opportunities to enhance these for recreational use and biodiversity. It would be expected that formal play areas are included in the detailed designs and we would welcome the opportunity to provide further comments at the detailed planning stage

Regards

Dave Hughes

Public Realm Officer

-----Original Message-----

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 11 November 2020 16:37

To: BMSDC Public Realm Consultation Mailbox

<consultpublicrealm@baberghmidsuffolk.gov.uk>

Subject: MSDC Planning Consultation Request - DC/20/05046

Please find attached planning consultation request letter relating to planning application - DC/20/05046 - Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Kind Regards

Planning Support Team

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

Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.

For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

Planning Application – Consultation Response

Planning Application Reference:	DC/20/05046
Site:	Land on The North West Side of Barking Road, Needham Market, Suffolk
Proposal:	Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	22/12/2020

1. Policy position

The proposed development site is not part of the planned growth of the Pre-Submission Regulation 19 Babergh and Mid Suffolk Joint Local Plan (November 2020).

The NPPF section on Determining Applications, Paragraph 47, states that '*Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.*' Paragraph 48 refers to the weight that Local planning authorities may give to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

The Babergh and Mid Suffolk Joint Local Plan has now reached the Pre-Submission Regulation 19 consultation until the 24th December 2020.

It should also be noted that the District has a positive 5 Year Housing Land Supply position.

The relevant Development Plan context to consider is:

- the National Planning Policy Framework (2019)
- the Pre-Submission Regulation 19 Babergh and Mid Suffolk Joint Local Plan (November 2020)
- the saved policies of the Mid Suffolk District Local Plan (1998)
- the First Alteration to the Mid Suffolk Local Plan (2006)
- the Mid Suffolk District Core Strategy Development Plan Document (2008)
- the Mid Suffolk District Core Strategy Focused Review (2012)

Further to the above, it is important to note that the Needham Market Neighbourhood Plan is currently at Regulation 16 Submission stage, with consultation between the 2nd December 2020 to the 27th January 2021. The submission version of the Neighbourhood Plan (October 2020) refers to the Babergh and Mid Suffolk Joint Local Plan for the planned growth identified for Needham Market, and does not propose the allocation of this site.

2. Infrastructure Delivery Plan (IDP) position

The IDP of September 2020 provides an updated position from the previous IDP of July 2019, and it sets out both Babergh and Mid Suffolk's infrastructure requirements and priorities. It was published on the 12th November 2020 as evidence which supports the Pre-Submission Regulation 19 Joint Local Plan. The IDP is an iterative document which is updated annually to reflect the changes in infrastructure capacities, requirements and priorities.

The proposed development is not part of the proposed site allocations of the Joint Local Plan and therefore there are no site-specific infrastructure needs set out for this site in the IDP. The infrastructure required to support it are assessed through the planning application consultation process.

For the purpose of this response, and to understand the impact on infrastructure capacity, the content of the IDP has been considered together with the existing planning commitments and responses from infrastructure providers.

Set out below are the current major residential planning applications and recent permissions (over 10 dwellings), and Joint Local Plan land allocations in the Needham Market area:

- 3153/14, Needham Chalks Ltd, Ipswich Road – Site under construction with permission for 266 dwellings.
- DC/19/02363/RES and 3679/13/OUT, Land West of Anderson Close Hill House Lane – Full permission for 38 dwellings
- DC/17/05549, Land North West of Hill House Lane – Outline permission for 66 dwellings. This site is part of the Joint Local Plan allocation LA030.
- DC/19/03729/RES and DC/18/02050/OUT, Land Accessed from Luff Meadow – Site under construction with permission for 28 dwellings.
- DC/18/05104, Former Mid Suffolk District Council Offices & Associated Land 131 High Street - Site recently under construction with permission for 94 dwellings. This site is part of the Joint Local Plan allocation LA032.
- DC/18/04811, Site at Needham Market Middle School, School Street - Site recently under construction with permission for 41 dwellings. This site is part of the Joint Local Plan allocation LA031.

Infrastructure considerations are:

- Education
For Early Years provision, the IDP refers to the planned growth and existing commitments and anticipated mitigation through expansion of existing facilities. However, this unplanned proposal is of the scale that would require a new on-site setting, as detailed in the County Council response of the 27/11/2020. This new setting would require Section 106 developer contributions towards the build costs and land (0.1ha) to be provided within the development site itself.

In terms of primary school education, the local catchment school is Bosmere County Primary. The IDP refers to Bosmere School in Needham Market as needing to expand from 315 to 360 places to provide for the committed and planned growth, and that it is able to expand to 420 places. As explained in the County Council response of the 27/11/2020, the strategy to provide for this unplanned growth would be to expand the primary school to 420 places, and a financial contribution towards the delivery of the primary school expansion in the form of CIL is required.

In terms of Secondary and Post 16 education, Stowmarket High School is the catchment school. Stowmarket High School recently benefited from an expansion however this unplanned growth would necessitate a further expansion, and consequently developer contributions are requested (in the form of CIL) from the County Council response of the 27/11/2020. A contribution towards the secondary school transport is also required, in the form of Section 106.

- Transport

Specific site details and required contributions are provided through the County Council Highway response.

The latest response of the 15/12/2020 from the County Council as Highway Authority is requiring two permanent access points, where one of these must not be within the floodplain. The County Council has made clear that this site cannot be accommodated by a main access point and an emergency access point.

In addition, the County Council is requiring further investigation for the provision of wider footways along Barking Road and provision for cyclists. Further to this requirement by the County Council, the Regulation 19 Pre-Submission Joint Local Plan policy LP32 concerning the strategy for Safe, Sustainable and Active Transport, also requires that all developments are to maximise the uptake in sustainable and active transport.

The severe impact of the issues raised above are such that the County Council has recommended that planning permission is refused on highway grounds.

- Health

The Needham Market Country Practice is adjacent to the proposed development site. As referred in the response from the Clinical Commissioning Group (CCG) of the 26/11/2020, this proposed growth has not been assessed for impact on health provision as part of the Infrastructure Delivery Plan and the Joint Local Plan policies. The CCG therefore expect that any impact will be mitigated through developer contributions which would need to be secured through CIL, to meet the cost of additional capital funding for health service provision arising. It is understood that the existing practice would not have the capacity to provide for this site, and therefore alternative provision would need to be looked at for the overall A14 corridor growth to find a suitable solution.

- Flood risk

The holding objection of the 01/12/2020 by the Environment Agency is of concern. The Environment Agency state that the majority of the site sits within Flood Zone 1, and that the South of the site is located in fluvial Flood Zones 2 & 3, medium & high probability zone. The submitted flood risk assessment of the planning application is not compliant with the latest national policy guidance and the Environment Agency are pointing to important matters that are the subject of their holding objection, such as the site access route which could be flooded to unknown depths, putting unacceptable risk to the health and safety of the occupants in a flood event, as well as the assessment of the impact of climate change using appropriate climate change allowances, and the impacts of fluvial flood risk.

- Waste

During the preparation of the IDP, Suffolk County Council who is responsible for the provision of Household Waste Recycling Centres (HWRC), has highlighted the needs and priorities for the Stowmarket catchment area. A new site for Stowmarket is to be identified by the County Council, for which developer contributions will be required towards this new provision. The IDP also refers to the developer contributions which

will be expected to fund this priority project, in the form of CIL. This is also reflected in the County Council response of the 27/11/2020.

- Libraries

The IDP refers to the need for libraries contributions from residential development as additional population will create additional demand for library services. Therefore, where capacity is not present at existing libraries, new development should make a contribution to the improvement and expansion of the existing library network, through the CIL process. This is reflected in the County Council response.

3. Summary

It will be essential that the above points are considered in conjunction with the current application process and infrastructure needs are addressed in accordance with the respective infrastructure providers consultation replies, this response and the IDP.

The proposed development site is contrary to paragraph 11 of NPPF. The development proposal does not accord with the adopted and emerging Development Plan policies and it should be noted that the District has a positive 5 Year Housing Land Supply position.

There is also identified harm to local infrastructure as set out above, consequently, taking account of the primary consideration, i.e. the Development Plan and where assessed against the policies of the NPPF as a whole, the adverse impacts of the proposal, the Strategic Planning Team therefore cannot support the proposal and recommends that planning permission is refused.

Jennifer Candler, Senior Policy Strategy Planner
Anik Bennett, Infrastructure Officer
Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

From: Paul Harrison <Paul.Harrison@babberghmidsuffolk.gov.uk>

Sent: 13 November 2020 10:43

To: Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: DC 20 05046 Needham Market

Heritage consultation response

Jasmine

I do not wish to offer comment on behalf of Heritage team on this proposal.

Paul

Paul Harrison

Heritage and Design Officer

T 01449 724677 | 07798 781360

E paul.harrison@babberghmidsuffolk.gov.uk

E heritage@babberghmidsuffolk.gov.uk

W www.babergh.gov.uk | www.midsuffolk.gov.uk

For our latest Coronavirus response please visit our website via the following link:

<https://www.midsuffolk.gov.uk/features/our-covid-19-response/>

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



From: Paul Harrison <Paul.Harrison@baberghmidsuffolk.gov.uk>
Sent: 21 January 2021 13:08
To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>
Subject: DC 20 05046 Needham Market

Jasmine

Further to our conversation this morning, you have asked for clarification as to why in responding to your consultation request I offered no comment on behalf of Heritage team.

The proposal has potential to affect the setting of any nearby heritage assets. The only one likely to be affected, in view of its location and character is Kennels Farm, a listed farmhouse on the rising ground to the south of Barking Road which I have visited in connection with a previous application. Its setting is predominantly rural with the urban edge of the town to the north. The proposal would bring that edge closer, increasing the quantum of residential development and slightly widening its arc as viewed from the listed building. But as the development would not fundamentally change the character of land in the setting, I concluded that a formal assessment of significance and impact by myself was not necessary in this instance.

I trust this is helpful.

Regards

Paul

Paul Harrison
Heritage and Design Officer
T 01449 724677 | 07798 781360
E paul.harrison@baberghmidsuffolk.gov.uk
E heritage@baberghmidsuffolk.gov.uk
W www.babergh.gov.uk | www.midsuffolk.gov.uk

From: David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>
Sent: 12 November 2020 12:15
To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: DC/20/05046 Land On The North West Side Of, Barking Road, Needham Market

Jasmine

I have no objection in principle to this application as any arboricultural impact would appear negligible, no trees are proposed for removal. However, some of the development in the south west corner of the site looks to be in close proximity to the important woodland W48 and this requires clarification. If you are minded to recommend approval we will require further information including a detailed arboricultural method statement and tree protection plan to help ensure the proposed safeguarding measures are effective, this can be dealt with under condition.

Please let me know if you require any further input.

Regards

David Pizzey FArborA
Arboricultural Officer
Tel: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils – Working Together



Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

15/12/2020

For the attention of: Jasmine Whyard

Ref: DC/20/05046; Land on the north west side of, Barking Road, Needham Market

Thank you for consulting us on the application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

The following landscape and visual observations have been made following a desktop study and a site visit by a Chartered Landscape Architect and Member of the Landscape Institute. The site visit was undertaken on a bright and clear day in early December 2020, when deciduous trees had minimal leaf cover and visibility was good.

The existing site (16.2ha) is a large-scale sloping open arable fields with field boundaries marked by hedgerows in varying condition. The eastern boundary abuts existing residential development, the western boundary by agriculture fields and priority habitat deciduous woodland, the north by the football ground adjacent to 'the Drift' PRow and the south by Barking Road.

This site was also identified as potentially suitable land for residential development in the Babergh and Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA 2017) (Site SS1070). However, landscape was one of the identified constraints that required further investigation. Since then, a Landscape Sensitivity Assessment (LUC, 2020) was produced, which identifies the site as having moderate landscape sensitivity to residential development. It states "*The landscape makes a positive contribution to the rural setting and character of Needham Market and provides a rural backdrop to existing settlement...The development of the site is likely to be perceived as encroachment into the countryside. Other sensitive features including the sloping landform, undeveloped backdrop provided to existing settlement, open views and deciduous woodland habitat*".

The site is adjacent to a Special Landscape Area (SLA). Policy CL2 Special Landscape Areas of the Mid Suffolk Local Plan (1998) Saved Policies states that development proposals in Special Landscape Areas "*will only be permitted where they maintain or enhance the special landscape qualities of the area and ensure that the proposal is designed and sited so as to harmonise with the landscape setting.*" Although not located within the SLA, it's important that the setting of the SLA is also protected.

Policy CS 5 Mid Suffolk's Environment (Mid Suffolk Core Strategy 2008) states that; *“All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area. To protect, manage and enhance Mid Suffolk's biodiversity and geodiversity based on a network of:*

- *Designated Sites (international, national, regional and local)*
- *Biodiversity Action Plan Species and Habitats, geodiversity interests within the wider environment*
- *Wildlife Corridors and Ecological Networks*

and where appropriate increase opportunities for access and appreciation of biodiversity and geodiversity conservation for all sections of the community....”

In regards to Landscape: *“ The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encourage development that is consistent with conserving its overall character.”*

The Suffolk Landscape Character Assessment defines the landscape character types (LCT) for the site and the surrounding landscape. The Rolling Valley Farmlands LCT defines the eastern part of the site, whilst the western edge of the site is defined by Ancient Plateau Claylands LCT. Key features of both LCT include; distinct areas of regular field patterns, flat or gently rolling arable landscape, small patches of straight-edged fields associated with the late enclosure of woods and greens and hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees. The assessment states that due to rolling landform, settlement expansion will have a significant visual impact and adversely affect the character of the landscape. While the outline proposal looks to mitigate its impact on the landscape setting and character by enhancing the existing field boundaries and the provision of additional green infrastructure/structural planting too, there is still a concern that the development is disconnected from the existing settlement, encroaching into the countryside, and impacts on the landscape setting and character will be adverse.

Review of submitted information

The submitted Landscape and Visual impact Appraisal (LVA) (Document ref: LFM/PPL/NEE/LA01) has been prepared following the principles set out in the third edition of the "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) including an assessment of both landscape and visual sensitivity, magnitude of change and impact.

The submitted LVA is accurate and appropriately describes the range of views that are available surrounding the site. However, we consider the assessment underestimates the likely effects of the proposed development on landscape character and visual amenity. For instance,, in terms of visual amenity, the LVA is supported by visual receptor photography following a summer site visit in 2018. We would have expected all visual representation with any submitted LVA to be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.

For a development of this scale and in such an open location, the site survey should have been supported by winter views to ensure a 'worst case scenario' is being appraised. The appraisal format is convoluted with representative viewpoints and the residual effects not clearly identified. Instead, 'development effects' both negative and positive are described and an overall summary of the residual effects on visual receptors is provided. Views such as those from the 'drift' PRoW and Barking Road should be considered and appraised individually so visual impact is not misjudged and undervalued.

In regards to the landscape appraisal, the report refers to the quality of the landscape, stating that *“The site has also been excluded from the designation of SLA which surrounds the site to the West, East and South and the quality of the landscape is therefore considered ordinary.”* The use of the word ‘ordinary’ is unusual and given the rural setting this landscape provides to Needham Market, sloping topography and open views, we would consider this landscape to be of good quality. In regard to residual effects, we understand that there will be mitigation planting proposed as part of the development, along with enhancements to existing vegetation, however this does not detract from the impact that additional housing, infrastructure and lighting will have on this rural landscape edge, encroaching into the countryside and impacting on the setting of the SLA. These negative effects don’t seem to have been considered with the same weight as the proposed positive effects.

It’s also worth noting that the landscape is classed as Grade 2 agricultural land, which means its very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting. This land is given a higher status when considering development as NPPF paragraph 170 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by [...] recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

Policy CS 5 (Mid Suffolk Core Strategy 2008) also refers to geodiversity, and how it should be protected, managed and enhanced.; *“All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area. To protect, manage and enhance Mid Suffolk’s biodiversity and geodiversity”*. Therefore, consideration for its geodiversity quality, as well as its landscape and visual quality should be a key factor in determining the suitability for development on this site.

For these reasons above, we cannot be supportive of this outline planning application. In this response, we have highlighted a number of suggested amendments which would need to be reviewed and considered. The submitted Landscape and Visual Impact Appraisal includes some mitigation proposals, however the principal of development in this landscape will have an adverse impact on the geodiversity, as well as the rural setting and character of Needham Market and the SLA, all of which are contrary to Policy CS 5.

If you have any queries regarding the matters raised above, please let me know.

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Senior Landscape Consultant
Email: ryan.mills@essex.gov.uk

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

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



1st December 2020

Jasmine Whyard
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this outline application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/20/05046
Location: Land On The North West Side Of Barking Road Needham Market Suffolk
Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Dear Jasmine,

Thank you for consulting Place Services on the above outline application.

Holding objection due to insufficient ecological information on European Protected Species (Hazel Dormice & bats), Protected species (reptiles) and Priority species farmland birds (Skylark)

Summary

We have reviewed the Ecological Impact Assessment (Parker Planning Services Ltd, December 2018), provided by the applicant, relating to the likely impacts of development on designated Sites, protected and Priority species & Habitats.

We are not satisfied that sufficient ecological information is currently available for determination of this application.

This is because the Ecological Impact Assessment to support this application is out of date, following CIEEM¹ and Government Guidance² (Protected species and development: advice for local planning authorities).

¹ [Advice note on the Lifespan of Ecological Reports and Surveys \(CIEEM, April 2019\)](#)

² <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#standing-advice-for-protected-species>



Therefore, a professional ecologist will need to undertake a further site visit and may also need to update desk study information, to inform a revised Ecological Impact Assessment. The professional ecologist will then need to provide a clear statement, with appropriate justification, on:

- The validity of the report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

We do not consider that the Dormouse or reptile surveys are up to date or fit for purpose. This is because the surveys were conducted in 2016 by Southern Ecological Solutions Ltd for the refused application (3506/16) and were only carried out on the southern part of the site. Therefore, it is recommended that these surveys are updated to support this application, unless reasonable justification can be provided why no further surveys are required. In particular, it is highlighted that Hazel Dormice are a notoriously difficult species to survey and a lack of evidence within 2016 does not necessarily mean that the species is likely absent from the site if the habitat is suitable and connectivity across the wider landscape is present.

Furthermore, it is considered likely that development could impact upon foraging and commuting bats. Therefore, we recommend that a Bat Activity Survey should be carried out to assess the likely impacts upon these European Protected Species. This is necessary to determine whether masterplans will impact upon key bat flightpaths and will help inform appropriate Wildlife Sensitive Lighting Strategies for the scheme. Any additional recommendations should follow guidance provided by BCT & ILP (2018)³.

All necessary further surveys must be undertaken by suitably qualified ecologists at the appropriate time of year using standard methodologies. This is required prior to determination because the Local Planning Authority must consider the guidance under paragraph 99 of the ODPM Circular 06/2005. This advises that the presence or otherwise of protected species, and the extent to which they might be affected by the proposed development, must be established before planning permission is granted. Therefore, if there is a reasonable likelihood of protected species being present and affected by the development, the surveys should be completed and any necessary measures to protect the species should be in place before the permission is granted.

We also note that the Ecological Impact Assessment has identified that development will result in the loss of between 1.4 and 4.2 estimated nesting territories of Skylark within the site based on average nesting densities on arable farmland. Therefore, it is recommended that a Farmland Bird Mitigation Strategy will be required to secure offsite compensation for the maximum number of nesting territories that could be present on the site. Therefore, the proposed offer to provide nesting opportunities for other BoCC Red listed species is not considered appropriate as it involves no measures for Skylark, a Priority Species.

The Farmland Bird Mitigation Strategy would require the delivery of two Skylark plots for every Skylark territory lost or displaced, following the methodology for the Agri-Environment Scheme option: '[AB4 Skylark Plots](#)'. The Skylark plots should be secured in nearby agricultural land for a period of 10 years.

³ [Bat Conservation Trust and Institution of Lighting Professionals \(2018\) Guidance Note 08/18: Bats and artificial lighting in the UK Bats and the Building Environment Series. BCT, London.](#)



This could include correspondence with [Whirledge & Nott](#) who may be able to secure delivery of the bespoke mitigation strategy under a stand alone agreement or alternatively, if appropriate nearby agricultural land within the applicant's control can be provided, details for the Skylarks plots can be included in the Farmland Bird Mitigation Strategy.

Therefore, further information is required to provide the LPA with certainty of impacts on protected and Priority species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to provide the additional information to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

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

17 December 2020

Jasmine Whyard
Planning Officer
Mid Suffolk District Council
Endeavour House, 8 Russell Rd,
Ipswich, IP1 2BX

Dear Ms Whyard,

DC/20/05046 Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access. Land on The North West Side Of Barking Road Needham Market Suffolk

I am writing on behalf of the Suffolk Preservation Society (SPS) to object to the above application for the erection of 279 dwellings on a greenfield site on the western edge of Needham Market. Development of the southern portion of this site for 152 dwellings was previously refused (application ref: 3506/16) on the basis of the singular vehicular access point onto Barking Road and the considerable distance of the site from school and community facilities. Whilst SPS defers to the SCC Highway authority on highway issues, it does not appear that these fundamental reasons for refusal have been adequately addressed in the current application.

Moreover, we have concerns regarding the landscape impact of these proposals on the increased site which will introduce a large number of new dwellings, lighting and vehicular movements into the countryside edge of the town. The topography of the land rises away from Barking Road which will result in the development being particularly prominent when approaching Needham Market from the west. Therefore, although a degree of landscape mitigation through enhanced hedgerows has been proposed, this will have limited effect on the visual impact particularly in the winter months. The Suffolk Landscape Character Assessment defines the landscape character types as Rolling Valley Farmlands and Ancient Plateau Claylands and states that due to rolling landform of both areas, *settlement expansion will have a significant visual impact and adversely affect the character of the landscape.*

The 2020 SHELAA raises landscape as one of the potential constraints of developing this site and we note that this site has not been brought forward in either the emerging joint local plan or Needham Market Neighbourhood Plan. Whilst the development would represent a significant contribution to the housing needs of the district, taking into account the landscape and access and sustainable location issues, we see no justification in approving this application and urge that it is refused.

We trust that you will find these comments helpful in the consideration of this application.

Yours sincerely,

Bethany Philbidge
BSc (Hons) MSc (Town Planning)
Planning Officer


Cc: Needham Market Town Council
Phil Butler, SPS Mid Suffolk District

From: Stowmarket Ramblers

Sent: 01 December 2020 17:42

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: RE: DC/20/05046 - Land On The North West Side of Barking Road, NeedhamMarket

 **EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Thank you for your message. I will not be commenting on this planning application.

Bob Boardman, Stowmarket Ramblers



Needham Market Society

19 Steggall Close NEEDHAM MARKET IP6 8EB

27 November 2020

Babergh & Mid Suffolk District Councils

Endeavour House

8 Russell Road

IPSWICH

IP1 2BX

Dear Sirs

[Planning Application DC/20/05046](#)

The Society has been considering the outline planning permission for housing on a block of land along the Barking Road.

The Society was established over 60 years ago when another enormous increase in dwellings threatened the town, and it still aims to ensure that any development of Needham Market should be consistent with the preservation of its present character in the interest of its present residents.

The proposed development would deeply affect the present residents. NHS England, according to the Parker Planning Services document, have stated that the "development is likely to have an impact on the services of the GP practice nearby which does not have capacity for additional growth". The primary school has no further capacity either. We all need reasonable access to a doctor, notoriously difficult even before the pandemic, and our children need educating.

The additional traffic from workers and school runs would clog up an already very busy B road running through the town as well as the residential streets. The Barking Road B1078 where the main access/egress for the site is proposed is another cause for concern. Speeding traffic has historically caused accidents along that stretch. As for public transport the train station is a long walk from the site, along unlit paths from the proposed pedestrian entrance/exit to The Drift, and the only bus service travels along the B1113, the High Street. There is no longer a bus service along Foxglove Avenue even though the stop signs remain.

The flood risk does not seem to have been adequately addressed. The Gipping Flood plain is nowhere near the site, the flood problem is to do with the lie of the land. To apply concrete and tarmac to that land will increase flood risk particularly at times of heavy rain which, even in this dry region, are on the increase.

The combined Mid Suffolk/Babergh Local Plan states that there were 497 dwellings planned for Needham Market, including 311 outstanding planning permissions granted as at 1 April 2018, 245 of which relate to the Chalk Pit development. The Joint Local Plan allocated a further 186 dwellings comprising LA030, 66 on land west of Stowmarket Road, LA031 40 on the Middle School site and LA032 80 on the former MSDC offices and car park site. These numbers were subsequently changed in 2018/9 to 64, 41 and 94 respectively bringing the total to 199. Add to this permissions granted for a further 24 dwellings on Luff Meadow, 4 at The Institute and 9 on the Stowmarket Road and it is quite clear that no more new homes are required by the Local Plan.

We consider the planned target of utmost importance. No more new homes are required by the Local Plan. A development of the size proposed for Barking Road is totally disproportionate to the scale of amenities available to Needham Market residents. The character of the town and the enjoyment of it by those currently living here will be seriously affected by such a development.

The Needham Market Society objects to the proposal.

Yours faithfully

Mrs A K Davies

Chairman

Jasmine Whyard
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX
Via email

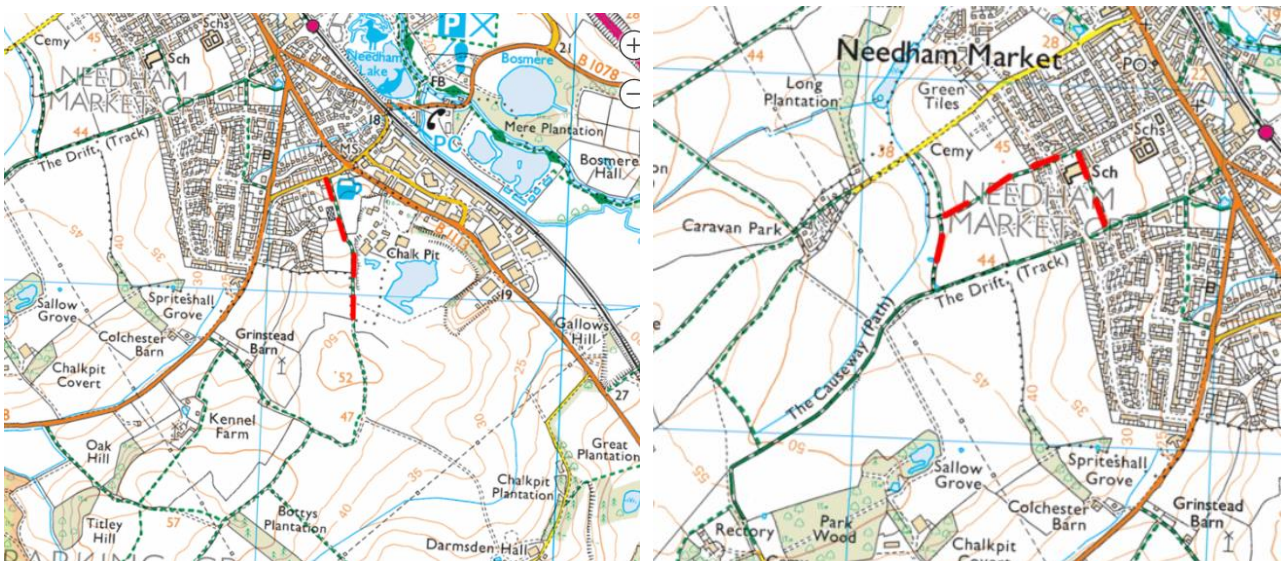
13th November 2020

Dear Ms Whyard,

RE: DC/20/05046 | Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access. | Land On The North West Side Of Barking Road Needham Market Suffolk

I am responding to this consultation on behalf of The British Horse Society, an equestrian Charity which represents the 3 million horse riders in the UK. Nationally equestrians have just 22% of the rights of way network. In Suffolk, they have just 18% of the rights of way network, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development within the County. It is therefore important that these public rights are protected.

The British Horse Society has no objection to this application in principle but believes that historical evidence indicates that Needham Market Footpath 1 and Needham Market Footpath 11 are under recorded as a footpaths outside of the red line of the location plan, these routes can be reasonably alleged to subsist at a minimum of bridleway status. This public right should be asserted and an application to the County Council to have them recorded as such is likely to be forwarded in due course. These routes shown on the map below should be upgraded to at least Bridleway status if not Restricted Byway status as a condition of the permission being granted.



The British Horse Society is an Appointed Representative of South Essex Insurance Brokers Limited who are authorised and regulated by the Financial Conduct Authority.

Registered Charity Nos. 210504 and SC038516. A company limited by guarantee. Registered in England & Wales No. 444742

Nationally, it is estimated that there are **3.5 million people** in the UK who ride or who drive a horse-drawn carriage. We estimate that 220,000-270,000 are employed in equine industries and the equine industry is estimated to be contributing at least **£7 billion each year** to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc.

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2019, the BHS received reports of 3,737 road incidents, in which **315 horses and 43 people were killed**. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, **3,863** horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (*NHS Hospital Episodes Statistics*).

The Society would argue that to fail to give proper consideration to their needs is a breach of the Equality Act 2010 and the Equal Opportunities Act 2010, as this failure can be seen to be both sexist and ageist, given that the majority of riders are female (over 90%) and many of them are over 45 (37%)¹. This group is one that is generally more inactive than their male counterparts (for example only 62% of women aged 45-54 meet recommended physical activity levels compared to 70% of men²) and so encouraging activity in this group meets important health objectives.

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <https://www.bhs.org.uk/our-work/safety/dead-slow> – we recommend taking a few minutes to watch the ‘Dead Slow’ virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however it is simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). England and Wales have over 140,000 miles of RoW, but only 22% of this network is available for horse riders (who may only use routes designated as Bridleways and Byways) and a mere 5% to carriage drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next.

Therefore the BHS asks that as part of the off-site network connections that Barking Footpaths 43, 44,45 and 46 are upgraded to at least Bridleway status to create safe off road routes which would link to the previously mentioned rights on Needham Market Footpath 11. The BHS would like to see the indicative footpath as shown with blue dashes on the plans to be instead a public bridleway allowing access for pedestrians, cyclists and equestrians, this would provide an essential link from Barking Public Bridleway 26 and Needham Market Public Bridleway 15 to Barking Footpath 46 which would create circular routes for users.

If Needham Market Public Bridleway 15 is going to be used for access then the Applicant MUST also take the following into account, and should note that regardless of whether planning permission is granted, separate permission for works on or over a Public Right of Way MUST be requested from Suffolk County Council’s Rights of Way Team prior to any work commencing, and that permission may be refused. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a Public Right of Way other than a Byway Open to All Traffic. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a Public Right of Way resulting from works must be made good by the applicant.

¹ British Horse Society Health Benefits of Horse Riding (research undertaken by University of Brighton and Plumpton College)

² British Heart Foundation Physical Activity Statistics

Yours sincerely

Charlotte Ditchburn (Miss.)
Access Field Officer, East Region

Comments for Planning Application DC/20/05046

Application Summary

Application Number: DC/20/05046

Address: Land On The North West Side Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Case Officer: Jasmine Whyard

Customer Details

Name: Mrs Linda Hoggarth

Address: 26 Gipping Way, Bramford, Ipswich, Suffolk IP8 4HP

Comment Details

Commenter Type: Amenity Group

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: The Mid Suffolk Disability Forum would like to see a commitment to ensuring that all dwellings will meet Part M4 of the Building Regulations in an outline planning application.

Additionally, all dwellings should be visitable and meet Part M4(1), and 50% of the dwellings should meet the 'accessible and adaptable' standard Part M4(2). It is our view that, in housing developments of this size, a proportion of the dwellings should be built to wheelchair standard Part M4(3).

The indicative mix of dwellings implies that a reasonable number of bungalows will be included in the development to assist people with mobility problems and to assist people who wish to downsize from larger dwellings.

Every effort should be made to ensure all footpaths are wide enough for wheelchair users, with a minimum width of 1500mm, and that any dropped kerbs are absolutely level with the road for ease of access.

Surfaces should be firm, durable and level. No loose gravel, cobbles or uneven setts should be used.

A development of this size will have a significant impact on the GP surgery and other facilities nearby.

The Railway Station is only partially accessible to wheelchair users and those with mobility

problems but your report does not take note of this.

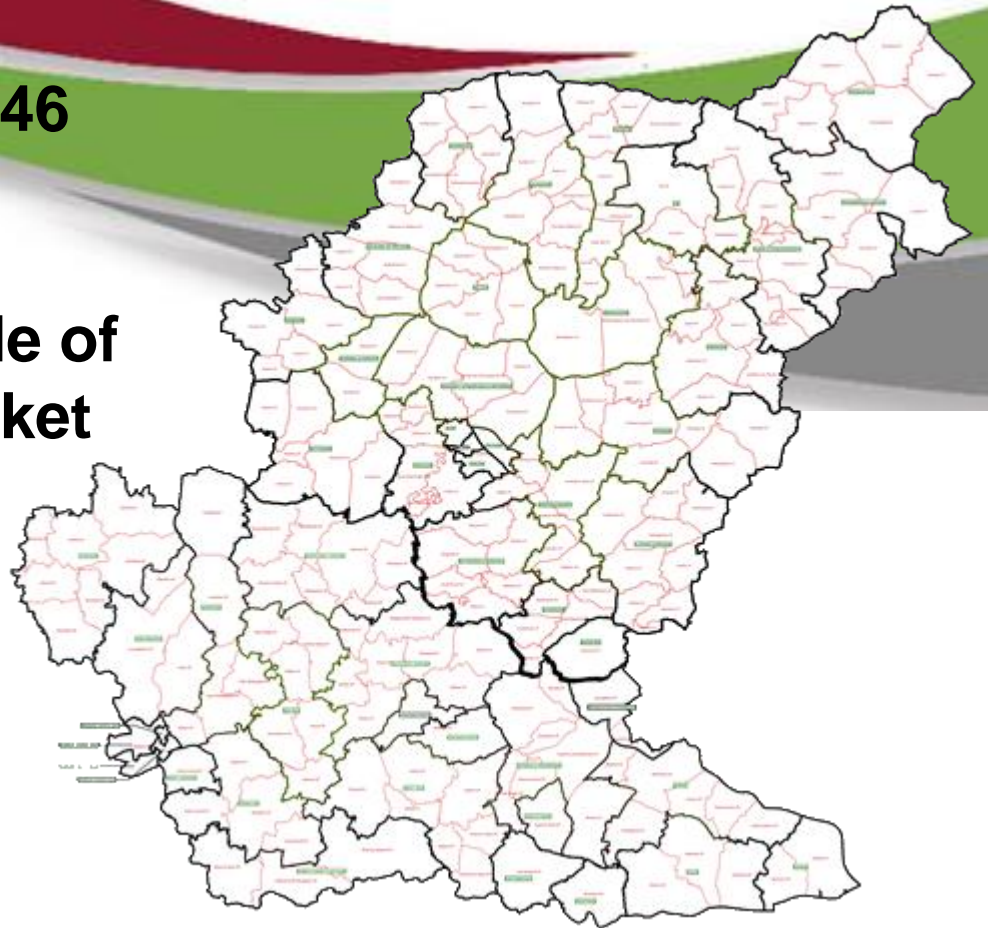
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Application No: DC/20/05046

Address:

**Land on the Northwest side of
Barking Rd, Needham Market**

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Aerial Map – wider view

Slide 3



Site Location Plan

Slide 4

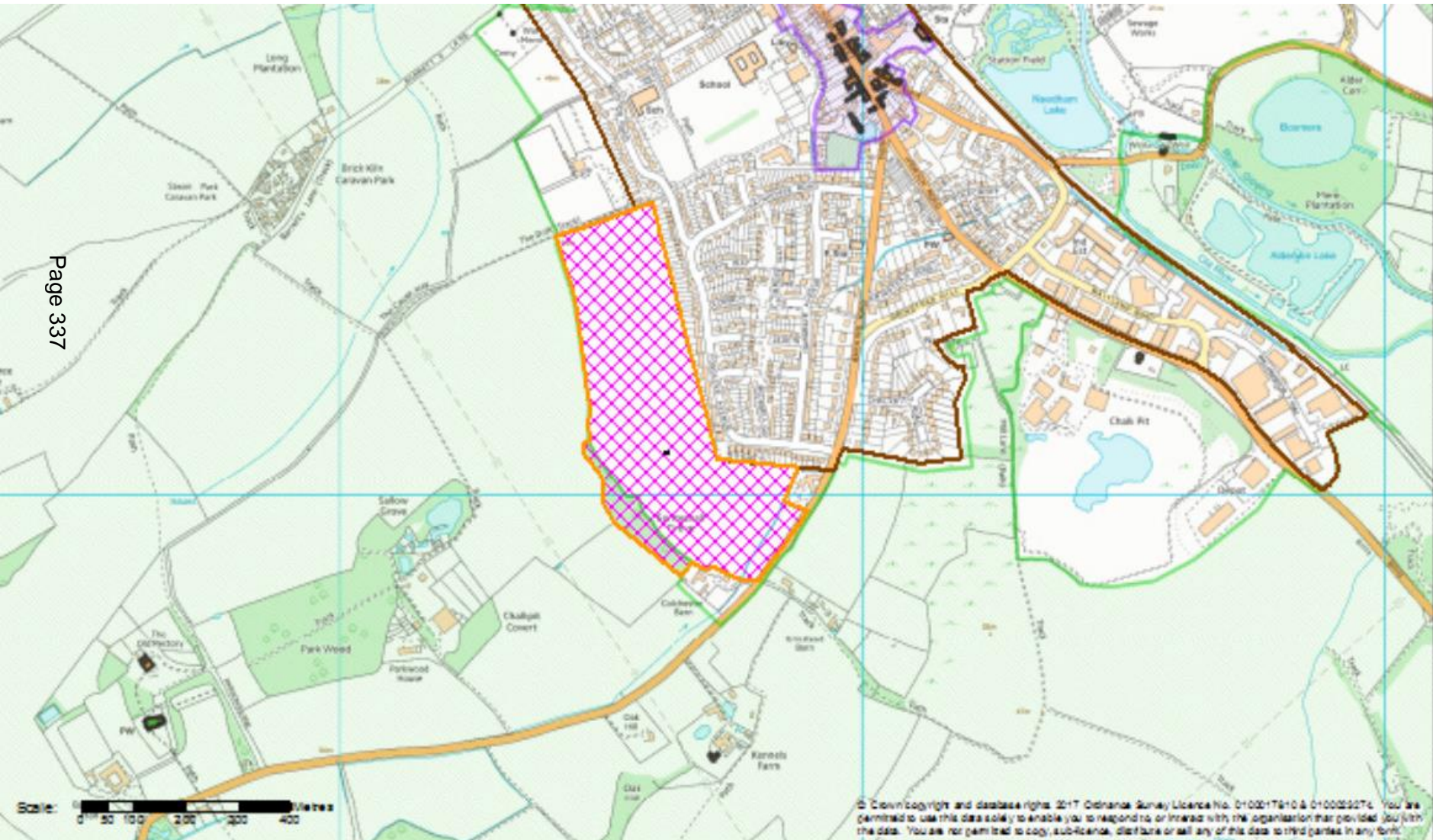


Constraints Map

Conservation Area
 Special Landscape Area
 Built Up Area Boundaries

Listed Buildings

- Grade I
- Grade II
- Grade II*



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Indicative Site Masterplan

Slide 6



Indicative Site Concept Plan

Slide 7



- Key**
- Main Access
 - 2 Storey Developments
 - 2.5 Storey Development
 - 1-1.5 Storey Development
 - Indicative Drainage Basin
 - Planted Buffer
 - Indicative Main Street
 - Indicative Secondary Street
 - Indicative Footpath
 - Existing Woodland
 - Open Space
 - Focal Point Building
 - Views Out

Indicative Site Character Plan

Slide 8



Indicative Accommodation Plan

Slide 9



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