

Public Document Pack



COMMITTEE:	PLANNING REFERRALS COMMITTEE
DATE:	FRIDAY, 19 MARCH 2021 9.30 AM
VENUE:	VIRTUAL TEAMS VIDEO MEETING

Councillors	
<u>Conservative and Independent Group</u> James Caston Peter Gould Kathie Guthrie (Chair) Matthew Hicks (Chair) Barry Humphreys Richard Meyer Dave Muller Timothy Passmore	<u>Green and Liberal Democrat Group</u> Rachel Eburne John Field Sarah Mansel John Matthissen Andrew Mellen Mike Norris Andrew Stringer Rowland Warboys

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 **RF/20/4 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 27 JANUARY 2021**

To Follow.

6	TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME	
7	RF/20/5 SCHEDULE OF PLANNING APPLICATIONS	7 - 12
a	DC/18/00861 LAND TO THE EAST OF, ELY ROAD, CLAYDON, SUFFOLK	13 - 226

Notes:

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

[Charter on Public Speaking at Planning Committee](#)

Those persons wishing to speak on a particular application must contact the Governance Officer on the details below at least 1 working day prior to the meeting to receive details on how to join the meeting .

They will then be invited by the Chairman to speak when the relevant item is under consideration. This will be done in the following order:

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

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

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

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@baberghmidsuffolk.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.

Evacuating the building in an emergency: Information for Visitors:

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

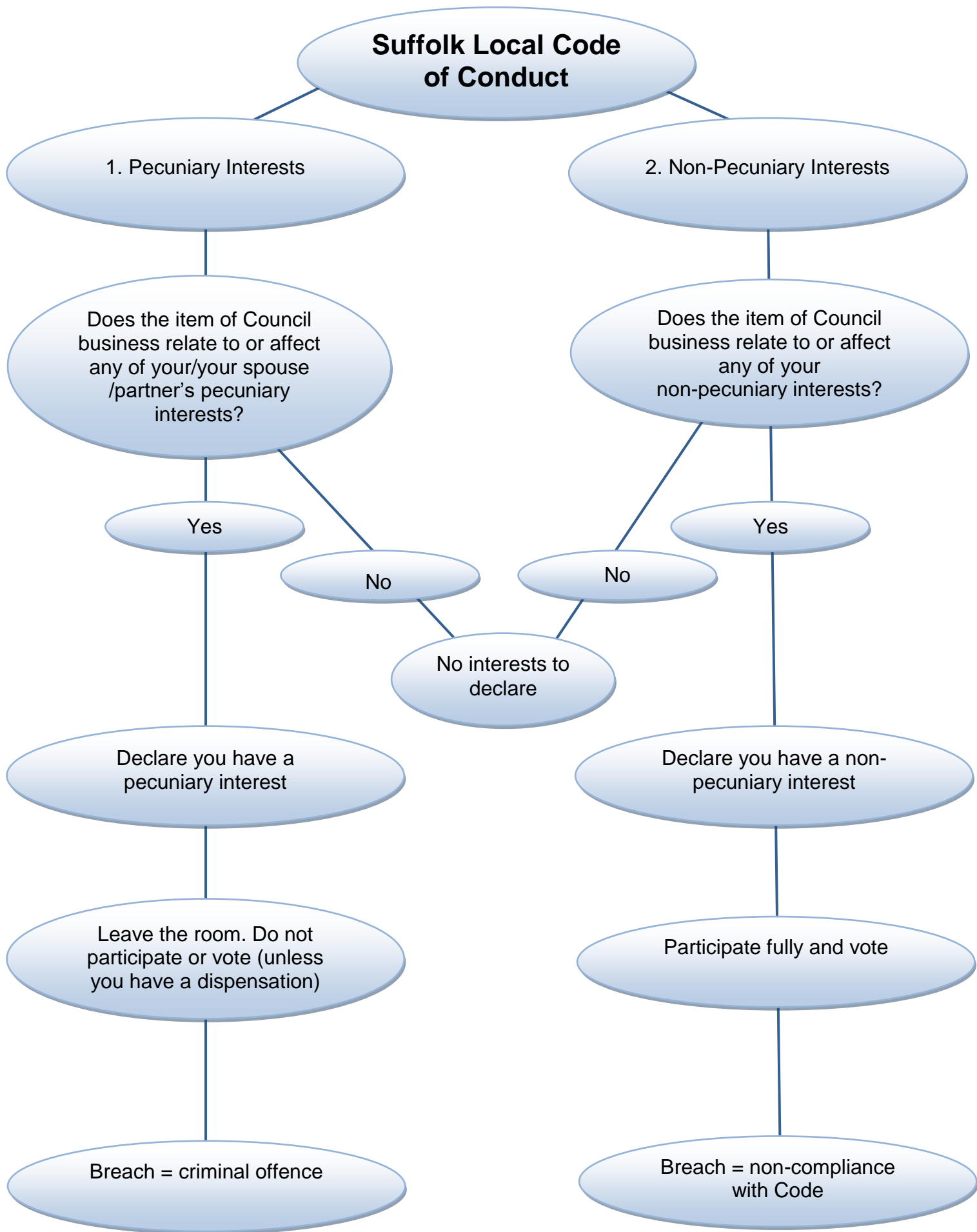
Housing Delivery – More of the right type of homes, of the right tenure in the right place

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')



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Agenda Item 7

MID SUFFOLK DISTRICT COUNCIL

PLANNING REFERRALS COMMITTEE

19th March 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/18/00861	Land to the east of Ely Road, Claydon, Suffolk	Cllr Tim Passmore & Cllr John Whitehead /Claydon and Barham	Jo Hobbs	12-224

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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/18/00861

Case Officer: Jo Hobbs

Ward: Claydon & Barham.

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

RECOMMENDATION – GRANT OUTLINE PLANNING PERMISSION WITH CONDITIONS

Description of Development

Outline Planning Application (with means of access to be considered) - Erection of up to 67 dwellings, public open space and supporting site infrastructure including access.

Location

Land To The East Of, Ely Road, Claydon, Suffolk

Expiry Date: 29/01/2021

Application Type: OUT - Outline Planning Application

Development Type: Major Small Scale - Dwellings

Applicant: M. Scott Properties Ltd, The St Edmundsbury & Ipswich Diocese

Agent: Mr Richard Clews, Strutt and Parker

Parish: Barham and Claydon (split across parishes)

Site Area: 3.37ha

Density of Development:

Gross Density (Total Site): 20 dwellings per hectare (DPH)

Net Density (Developed Site, excluding open space and SuDs): 30 dph

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: Yes – DC/17/4720

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

It is a “Major” application for:

- a residential land allocation for 15 or more dwellings

Details of Previous Committee / Resolutions and any member site visit

This application was considered by Mid Suffolk Development Control Committee A on Wednesday 4th July 2018. Members of the committee resolved to defer to Referrals committee on the following basis:

“- Need to consider accumulated impact of development in conjunction of other housing development proposals in the area, traffic flows and reference to Parish traffic Survey. May need updated SCC Highways response.

And need for:-

- Ensure clear understanding of SCC requests on footpath proposals and provision as a result of the development.
- Confirmation that any mineral allocation is not required
- Clarification of ecological interests and mitigation on site.”

Subsequently the application was considered by Mid Suffolk Planning Referrals Committee on 27th January 2021. Members resolved as follows:

“That the committee are minded to refuse application DC/18/00861 for the following reason:

The proposed development would not represent good design and would result in short term construction traffic and long term traffic associated with future residential occupation of the site. This traffic which would be reliant upon access through the existing road network within the adjacent residential area. This traffic would have a material detrimental impact upon that adjacent residential area reducing its amenity by reason of increased noise, activity, disturbance and traffic fumes contrary to policy H16 of the MSLP 1998 and paragraph 124 and 127 of the NPPF 2019 which requires a high standard of amenity for existing and future users – and to instruct officers to negotiate a lesser density of development.”

The application has subsequently been amended with the proposed number of dwellings reduced from 73 to 67 dwellings, representing a 10% reduction in the number of dwellings proposed. The resulting gross density would be 20 dph, and net density of 30 dph.

The following report outlines the subsequent responses received to the revised plans and officers’ recommendations on the revised plans. Please see Appendix 1 for the officers’ report to committee on 27th January 2021, which contains the full report on the relevant policies, consultee responses (unless amended subsequently below), representations and assessment of the application. This report below goes on to deal with the revised plans, design, amenity and highway impact. Members are directed to consider the revised application in light of the two reports read together but following the planning balance and recommendation set out within this report.

PART TWO – CONSULTATION SUMMARY

Consultations and Representations

The further consultation responses received in relation to the revised plans are summarised below. Previous comments submitted on the application are included in Appendix 4 to 8.

A: Summary of Consultations (Appendix 4)

Town/Parish Council

Claydon and Whitton Parish Council

Remain very concerned regarding the amount of cumulative traffic to Ely Road, Thornhill Road and village of Claydon, and safety of roads leading to development and space for larger vehicles within the proposed development including emergency vehicles and refuse vehicles.

National Consultee

NHS England

No further comments to make further to previous response.

Natural England

No further comments to make further to previous response.

County Council Responses

Suffolk County Council (SCC) Highways

No objections (conditions recommended in earlier response). Development would achieve safe and suitable access to the site for all users (para 108 of NPPF) and would not have a severe impact on the road network (para 109 of NPPF).

- Ely Road carriageway is 5.5m wide with 1.8m wide footways on both sides with direct access to dwellings and parking spaces which is the design for Minor Access Road as shown in Suffolk Design Guide (SDG). This type of road normally serves approximately 100 dwellings. Ely Road is approximately 140m long with 2 visitor parking bays, with 25 dwellings (only 11 dwellings with frontage along the road) and Winchester Gardens which has 19 dwellings. Therefore, with the proposal of 67 additional dwellings, Ely Road will serve 111 dwellings in total which is acceptable as shown in SDG.
- The proposal for 67 dwellings would create approximately 30 vehicle movements within the morning peak hour (1 vehicle every 2 minutes).
- The bus stops on Thornhill Road (200m from the site) has Bus Routes 113 and 114 with a service approx every 2 hours to Ipswich and Eye. To catch the more frequent service Route 88, the closest bus stop is approximately 1km from the site, approximately a 12 minute walk.
- As the previous response to this application, the catchment primary school is approximately 650m from the site which is comfortably within walking distance for pupils to walk to school. The proposed mitigation measures for footway improvements between the site and the primary school will create a safer route for the vulnerable user.
- the proposed mitigation measures to be funded by this and The Norwich Road Barham application will provide footway improvements in the Village.
- The site has Public Rights of Way footpaths adjacent it's boundary. Linking the site to public rights of way will provide a healthy, safe and sustainable way to access the countryside and other local services.

SCC Strategic Development

No objections subject to following revised infrastructure requirements:

CIL	Education	Total	Per dwelling contribution
	- Secondary school expansion	£261,525	
	- Sixth form expansion	£47,550	
CIL	Libraries improvements and resources	£14,472	

CIL	Waste disposal improvements	£8,308	
S106	Education		
	- Primary school new build	£307,620	£4,591.34
	- Primary school land cost	£17,655	£263.51
S106	Highways	£15,542	
S106	Public Rights of Way	£58,125	
S106	Monitoring fee	£412 per trigger point in S106	

SCC Lead Local Flood Authority

No further comments to make further to previous response.

SCC Mineral Planning Authority

No further comments to make further to previous response.

SCC Fire and Rescue

No further comments to make further to previous response, condition required for fire hydrants.

Internal Consultee Responses

Place Services Landscape

No further comments to make further to previous response, conditions as previously requested.

Place Services Ecology – comments to be reported to Members in Tabled Papers to verbally at committee meeting.

Babergh Mid Suffolk District Council (BMSDC) Heritage

No comments to make on amended proposal.

BMSDC Environmental Health – Air Quality

No further comments to make further to previous response.

BMSDC Environmental Health – Sustainability

Recommend refusal, consideration of sustainability issues should be made at the earliest possible stage. If minded to approve recommend a condition for water, energy and resource efficiency measures.

Officer response: The scheme is at outline stage but based on the information submitted with the application and subject to the proposed conditions, it is considered that the requirements of policy CS3 can be met and would be secured at the reserved matters stage. Further discussion on this matter is outlined below.

BMSDC Environmental Health – Contamination

No further comments to make further to previous response.

BMSDC Strategic Housing

No objection subject to securing affordable housing through S106 agreement. Strong need for single storey or 1.5 storey dwellings.

BMSDC Public Realm

No comments to revised plans. Sufficient open space and play space can be secured at reserved matters stage.

B: Representations

At the time of writing this report at least 28 additional letters/emails/online comments have been received in response to the application in total, of which 6 were new representations not previously made. It is the officer opinion that this represents 25 objections, 1 letter of support and 2 of general comments. A verbal update shall be provided as necessary. The majority of matters raised in these additional letters of representation have been included in section B: Representations in the main committee report (Appendix 1). The following additional comments have been made:

- The reduction in houses has reduced the number of affordable homes and concentrated on larger higher value properties.
- Oppose cul-de-sac development
- Concern affordable homes will not be affordable
- Loss of open space, detrimental to mental health
- Concern sustainability and renewable energy measures cannot be secured on proposed layout
- Use 3D printed homes

(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: DC/18/00861	Outline Planning Application (with means of access to be considered) - Erection of up to 67 dwellings, public open space and supporting site infrastructure including access.	DECISION: Pending decision
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Adjacent to site but outside of this application site boundary:

REF: DC/20/00674	Full Planning Application - Erection of 9no. dwellings including associated works, car parking and garaging.	DECISION: Approved
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PART THREE – ASSESSMENT OF APPLICATION

1. The revised proposed development

1.1 The application is for outline permission for 67 residential dwellings with all matters reserved except access, which is proposed from Ely Road. To demonstrate the site (3.37ha) is capable of accommodating 67 dwellings and indicative site layout plan and supporting information has been submitted. This includes:

- Vehicular access via Ely Road;
- A traffic calming feature will ensure slower movement between the proposed development and existing streets;
- Pedestrian access from Ely Road but also to several points along the footpaths and bridleways surrounding the site, including The Slade;

- 67 dwellings comprising of 8 flats, 10 bungalows and 49 houses, split into two locations separated by open space and the retained hedge on site;
- Open space and play areas – 2672sq.m. and 925sq.m. areas;
- 25 affordable dwellings (35% of total) indicatively shown as being accessed from three different locations;
- Single storey dwellings to the south west and north west of the site;
- Landscape buffer to the west boundary;
- Ecological protection area increased in depth;
- Pond feature for protected species enhancement to the south west of the site;
- Ecology protection area to the north east adjacent to The Slade.

1.2. The layout plan is indicative only, but has demonstrated how parking and garaging arrangements can meet the required Suffolk Parking Standards, although this would be a matter detailed at the Reserved Matters stage.

1.3. The resultant gross density of the scheme is 20 dwellings per hectare, and net density excluding areas of open space of 30 dwellings per hectare. For comparison the gross density of development at Hereford Drive and Exeter Road is 24 dwellings per hectare. By comparison gross density of development around Ely Road and Winchester Gardens is around 28 dwellings per hectare. The development permitted directly to the south of this site under application DC/20/00674 is identified as 19 dph.

1.4 The proposals for this application have been amended subsequent the Members resolution as outlined above. The amendments have reduced the number of dwellings from 73 to 67. The number of bungalows has increased from 8 to 10, and proposed in two areas to the south west of the site and to the north west of the site, to relate better to the scale of development neighbouring the site on Winchester Gardens. It is proposed to deliver these to Building Regulation Part M4(2) or M4(3) standards to ensure accessibility as deemed necessary at the reserved matters stage through planning condition. The rough grassland buffer to the south and south east of the site has been increased to give more space for protected and priority species. The applicants have also submitted further information to demonstrate a biodiversity net gain of 15.89% could be achieved on the site through the proposed biodiversity enhancements, over the emerging requirement for 10% biodiversity net gain indicated in the Environment Bill.

1.5 The previous indicative housing mix identified a total of 201 bedrooms. This figure has now reduced to 181 bedrooms, with the following indicative housing mix (both affordable and market):

12no. 4 bed houses
(18%)

24no. 3 bed house
4no. 3 bed bungalow
(42%)

13no. 2 bed house
5no. 2 bed bungalow
4no. 2 bed flat
(33%)

1no. 1 bed bungalow
4no. 1 bed flat

(7%)

1.6 Visitor parking spaces have been increased to 0.3 per dwelling, to a total of 20 visitor parking space.

2. Density and impact on residential amenity

2.1 Members concerns with the previous proposals for 73 dwellings focused on the impact on residential amenity from the proposed development and associated traffic. To take the matter of density first, officers must be mindful of the development plan policies, in particular Mid Suffolk Core Strategy Policy CS9:

“Housing developments should make best use of land by achieving average densities of at least 30 dwellings per hectare, unless there are special local circumstances that require a different treatment. Lower densities may be justified in villages to take account of the character and appearance of the existing built environment.”

2.2 The character of the surrounding development is a key reference point as to what density could be appropriate, whilst also considering the requirement to make the best use of land. The proposed density of 30 dwellings per hectare net, reducing down to 20 dwellings per hectare gross, is considered to both make best use of land in what is considered to be a sustainable location, whilst also being to a similar character in terms of density to the surrounding developments. As noted above the surrounding development range in gross density from around 24 dph at Hereford Drive and Exeter Road and 28pdh around Ely Road and Winchester Gardens. The development permitted directly to the south of this site under application DC/20/00674 is identified as 19 dph.

2.3 The proposed development is considered to meet the requirements of the current development plan, and officers strongly advice that a reason for refusal relating to density is unlikely to succeed at appeal.

2.4 The emerging allocation on this site and the potential density of 12 dph from the approximate 75 dwellings set out in emerging allocation LA003 across the allocation site area of 6.2ha was discussed at the last committee meeting. Officers would advise caution in placing anything more than limited weight on this allocation at present. The emerging site allocation does give a direction of travel for where growth could sustainably be located, but as the plan has not been submitted or tested through examination only limited weight can be placed on this plan. Concern over the total number of dwellings that could come forward through the allocation was also raised. Further land within the emerging allocation but outside of this application site, including land to the north of this application site and the 9 dwellings approved under application DC/20/00674 could deliver more than the currently identified 72 dwellings. Whilst further development could come forward on this land to the north, officers can only advice that significant weight cannot reasonably be placed on the emerging allocation at present. The recommendation to Members for this planning application is made in the context of the current development plan policies, as outlined in the conclusion to this report.

2.5 The impact on residential amenity from the proposed development was a matter of concern for Members at the last committee. The applicants have responded to this by revising the parameter plan to ensure single storey development would be built adjacent to existing dwellings on Winchester Gardens and Hereford Drive and Exeter Road. This would be secured through conditions ensuring future reserved matters were in broad accordance with the submitted parameter plan.

2.6 Member’s concerns in the resolution at the last committee were around the impact of construction traffic and future traffic associated with the residential dwellings proposed. The concerns related to residential amenity through noise, activity, disturbance and traffic fumes. The proposed development would lead to additional traffic movements, which have been identified as approximately 30 vehicle movements within the morning peak hour (1 vehicle every 2 minutes).

2.7 Whilst there would be an impact on residential amenity from these additional traffic movements to surrounding residents on Ely Road, Thornhill Road and Edinburgh Drive, the test for this planning application is whether there would be a significant impact to adversely affect the living conditions of local residents.

2.8 A comparable development where this matter was considered in detail was the appeal for Land adjoining Tuffs Road and Maple Way in Eye for outline planning application for up to 126 dwellings (reference APP/W3520/W/18/3215534, decision dated 2nd March 2020). A main issue included the effect upon living conditions of neighbouring residents relating to general disturbance.

2.9 Whilst each case must be judged on its merits there are some comparisons that give an indication of the strength of this reason for refusal. The appeal site would be accessed via two existing cul-de-sacs and the Inspector noted that it was a matter of common ground that the traffic increases associated with the development on these roads would be significant. The Inspector also noted the following in terms of residential amenity:

85. Taking the above together, the increase in traffic along these roads would be significant, and this would result in changes to general form and functionality of the culs-de-sac. In terms of the effect upon living conditions of residents of the local road network, there would be noticeable changes to the residential environment here from the traffic and traffic movements, and this would likely result in changed behaviours of those residents.

86. However, I do not consider that such changes would equate to harm to those occupants. As a general rule, primary routes through residential estates are fully capable of physically supporting residential developments along their length and can form a good residential environment for occupants. The baseline, particularly at Tuffs Road and Maple Way, is low, but any increased activity would be related to further residential development and movements. The change to the highway character type would thus not be as significant as to adversely affect the living conditions local residents; the general amenity and living conditions would be consistent with what can be reasonably expected in a residential environment.

2.10 SCC Highways maintain their position of no objection and do not consider the proposed development would lead to an unacceptable impact on highway safety. It is therefore difficult to substantiate a reason for refusal on this basis without the backing of the statutory consultee on this matter. There is no evidence before officers to support this reason for refusal and based on the conclusions reached by the Inspector for the above appeal on Tuffs Road and Maple Way in Eye officers strongly recommend that this reason for refusal is unlikely to success at appeal.

3. Ecology

3.1 The proposal has been amended to increase the ecological protection area to create more space for wildlife. The applicant have also provided further information to demonstrate that the biodiversity net gain that could be achieved on the site could be 15.89%, above the emerging requirement of 10% in the Environment Bill. This is a matter that would be secured through planning condition and considered at full by the council's Ecologist at that point in time, but the potential to reach this level of biodiversity net gain is welcomed should it be possible to secure.

3.2 The proposed development however does meet all requirements of the council's duties to protect and enhance ecology and biodiversity. Conditions will secure ecology protection, mitigation and enhancement, including the provision of Swift boxes, hedgehog fencing and wildlife sensitive lighting.

The council's Ecologist raised no objection to the previous scheme but officers welcome the increase in the area of the ecological protection area further.

4. Sustainability

4.1 As previously reported, the wider sustainability of the site has been considered. The site accessibility in terms of reducing reliance on private car use has been considered above. The construction of the development also requires consideration in terms of sustainability. The development would be required to be built to Code for Sustainable Homes (CfSH) level 6 by 2016 under policy CS3 of the core strategy. However, the Written Ministerial Statement on Housing Standards (reference HCWS488) made on 25th March 2015 is clear that requirements should not be set over CfSH level 4 due to revised Building Regulations Part L1A and Part G that came into force in 2015.

4.2 Meeting revised Building Regulations is considered to provide a good standard of construction, carbon dioxide emissions rate, energy performance of buildings and reduced water usage of 125 litre of water per person per day. Whilst the design and orientation of dwellings would be determined at a reserved matters stage along with the required compliance with Building Regulations, it is considered that the requirements of paragraph 150 of the NPPF which seeks to reduce greenhouse gas emissions could be adequately met.

5. Planning obligations

5.1 The reduced number of dwellings has impacted the requirement for affordable housing and education contributions. The previously reported highways and public rights of way contributions are still being secured despite the reduction in dwellings.

5.2 A Section 106 agreement will secure the following contributions:

- Secure no fewer than 23 affordable dwellings
- £8,166.63 for Recreational Access Disturbance Mitigation Strategy (for Stour and Orwell Estuary Special Protection Areas - £121.89 per dwelling)
- £307,620 for primary school building costs (£4,591.34 per dwelling)
- £17,655 for primary school land purchase (£263.51 per dwelling)
- £58,125 Public Rights of Way improvements to Barham Bridleway 009 and Claydon Footpaths FP13 and FP14
- Improvements to Church Lane Claydon/Norwich Road junction and Station Road/Norwich Road junction; Financial contribution toward transport improvements in the village to encourage walking and cycling, safer routes to school and improve safety for pedestrians and cyclists; and Norwich Road extension of Speed Limit on Norwich Road. The total cost of these works are estimated at £98,250 to be apportioned between this and Norwich Road application (reference 1856/17). This site has been identified to contribute £15,542.50, with the remainder to be sought from 1856/17.

5.3 Strategic Housing have confirmed the following indicative housing mix for the proposed 23 affordable dwellings would be acceptable, and would be secured through S106 agreement:

Affordable rented

- 4no. 1 bedroomed 2-person flats
- 4no. 2 bedroomed 4-person flats
- 6no. 2 bedroomed 4-person houses
- 2no. 3 bedroomed 5-person houses

Shared ownership

- 5no. 2 bedroomed 4-person houses

2no. 3 bedroomed 5-person houses

5.4 The development would be liable for CIL contributions, which would be sought for public transport improvements (real time bus passenger information sign at a cost of £13,000 for installation), library services, waste disposal improvements, provision of secondary school and sixth form places for this particular development and healthcare provision. Liability would be calculated at the reserved matters stage, and collected on commencement of development.

PART FOUR – CONCLUSION

6. Planning Balance and Conclusion

6.1 The applicant has sought to address Members concerns by reducing the number of dwellings, relocating single storey dwellings to adjacent to Winchester Gardens as well as Hereford Drive and Exeter Road, increasing the ecological buffer and space for nature. Officers do need to be mindful of the development plan policies that they can place weight on at present, and the proposals are considered to accord with the development plan. The emerging Joint Local Plan and approximate figure of 75 dwellings across this site can only be given limited weight at present, but the allocation does indicate the direction of travel of this site being a sustainable location for further development.

6.2 The applicant has revised the proposals on two occasions to positively respond to the concerns raised by Members at planning committees to bring forward the development in a manner that meets the requirements of the development plan. The proposals have been reduced to lessen the impact on the surrounding neighbouring properties and officers consider the harms of the scheme are outweighed by the benefits. For the sake of completeness, a full planning balance and conclusion is now made on this development in line with all matters raised in this and the main committee report (Appendix 1).

6.3 The starting point for any planning decision is the development plan, as identified in Section 38(6) of the Planning and Compulsory Purchase Act 2004. Determination of any application must be made in accordance with the plan unless material considerations indicate otherwise. A key material consideration regarding the principle of development is the National Planning Policy Framework (NPPF) 2019.

6.4 The most important policies for determining this application are:

- FC1 – Presumption in Favour of Sustainable Development
- FC1.1 – Mid Suffolk Approach to Delivering Sustainable Development
- CS1 – Settlement Hierarchy
- CS2 – Development in the Countryside and Countryside Village
- CS5 – Mid Suffolk’s Environment
- H7 - Restricting Housing Development Unrelated to the Needs of the Countryside

6.5 Policy FC1 reflect the presumption in favour of sustainable development in the NPPF and is considered to be up-to-date. Policy FC1.1 seeking to conserve and enhance the local character of different parts of the district, is up-to-date and relevant to this application. This policy seeks to promote the principles of sustainable development. Core Strategy policy CS5 also seeks to protect and conserve landscape qualities and encourage development that is consistent with the overall character of the area. This is considered to align with paragraph 170 of the NPPF which seeks to protect and enhance valued landscapes and recognises the intrinsic character and beauty of the countryside, and so can be given full weight.

6.6 Policies H7, CS1 and CS2 however are considered to be out-of-date having regard to the circumstances of this application and when considering consistency with the NPPF, and therefore

accorded less weight. When taken in the round and viewed collectively, the most important policies are therefore considered to be out-of-date. The proposals conflict with these policies in the development plan but is not necessarily fatal when considering other material considerations. Whilst it is noted this site has been identified for development of 75 dwellings across a larger site than just this application site in the emerging Joint Local Plan, this is at an early stage and so limited weight can be given to this at present.

6.7 Whilst the council can currently demonstrate a sufficient land supply, the above policies (when taken in the round and viewed as a whole) being out-of-date require the application to be considered in terms of paragraph 11dii) of the NPPF¹. This directs that development should be approved unless the adverse impacts of doing so outweigh the benefits and is known as the “tilted balance”.

6.8 Development of this site would provide the significant benefit of delivery of up to 67 dwellings, 23 (or 35%) of which would be affordable. The delivery of these dwellings has also been explored, and weight is placed on the benefit of these dwellings being highly likely to be delivered within the next five years, contributing to the Council’s five year supply of deliverable sites.

6.9 The site would have some short-term economic benefits from construction jobs during the build-out of the site, and there would be some economic benefits for local services such as shops and public transport from additional spend from the new residents to the area. These benefits would have moderate weight.

6.10 There would be important environmental benefits and a net gain for biodiversity secured through the Mitigation Strategy and Enhancement Plan and the Landscape and Ecological Management Plan, both of which are supported by the Council’s advisors. As this is a requirement of the NPPF however only moderate weight can be given to the scheme demonstrating this. The site is located in a fairly sustainable location, reducing the need to travel and facilitating the promotion of sustainable transport. There would also be benefits associated with the widening and resurfacing of the footpaths and bridleway around and within the site, but these must be balanced against the key harm of the Major/Moderate adverse impacts to residents of Winchester Gardens and Hereford Drive, and users of the bridleway 009 that runs along the north of the site.

6.11 The Major/Moderate harms identified create conflict with policy CS5 of the core strategy and paragraph 170 of the NPPF, both of which seek to protect and enhance the landscape quality of the site. But as identified earlier in the report the extent of where this landscape impact occurs is limited to a section of the wider Bridleway 009 and for some residents of Claydon. The impact whilst still Major/Moderate it does not impact on a wider landscape, but to a more local level within the site and when viewing the site from immediately neighbouring residential dwellings and the Council’s Landscape Architect supports the scheme.

6.12 Whilst it is noted that there would be delays to the road network with this and other proposed developments in the surrounding area, this delay would not be severe. Whilst it is identified that the development would lead to delays at two key junctions in Claydon, the highway impact would not be severe, and the delays would only occur for a relatively short period of time of 15 minutes at AM and PM rush hour peak times, to which this development would contribute very marginally to. The Local Highway Authority has supported the proposals at each stage. Therefore the proposed development would be in accordance with the requirements of the NPPF and there would not be a conflict of policy. The applicants have also gone further to provide additional pedestrian and cycle improvements within the village of Claydon responding to Members concerns.

6.13 The proposed development does conflict with a number of policies in the development plan. However, as the key policy conflict of the principle of development of this site relate to policies that are

¹ Where paragraph 11.d)i. does not direct that permission should be refused.

out-of-date, this policy conflict with H7, CS1, and CS2 are given less weight. The policy conflict regarding landscape protection is given less weight given the limited extent to this within the landscape.

6.14 When considering the wider planning balance, this scheme would lead to 67 deliverable dwellings of which 23 are affordable in a sustainable location. These three matters are given significant weight in the planning balance. The site is identified as an emerging site allocation for approximately 75 dwellings, and whilst this has limited weight in planning terms this does give an indication of the direction of travel as to where housing could be most sustainably located to meet the authority's housing need.

6.15 Paragraph 11 of the NPPF directs decision-making to approve development unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In this instance the adverse impact as noted above would not significantly and demonstrably outweigh the benefits. Overall it is recommended that the benefits of this deliverable housing in the sustainable location outweighs the above identified landscape harm that would result from this scheme and potential loss of Grade 3a agricultural land, and this scheme is considered to represent a sustainable development. The illustrative masterplan provides enough certainty at this outline stage that all other considerations could be adequately met at the reserved matters stage, or through the Section 106 agreement, planning condition or Community Infrastructure Levy requirements. Whilst there is conflict with the development plan as a whole, material considerations indicate otherwise and the development is recommended for approval.

RECOMMENDATION

That the application is GRANTED planning permission/listing building consent/other and includes the following conditions:-

(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:

- Affordable housing
 - This shall include not less than 35% of the total dwellings
 - 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.
- Primary school building costs - £4,591.34 per dwelling (total £307,620)
- Primary school land purchase - £263.51 per dwelling (total £17,655)
- Recreational Access Disturbance Mitigation Strategy (RAMS) contribution - £121.89 per dwelling (total £8,166.61)
- Improvements to Church Lane Claydon/Norwich Road junction and Station Road/Norwich Road junction; Financial contribution toward transport improvements in the village to encourage walking and cycling, safer routes to school and improve safety for pedestrians and cyclists; and Norwich Road extension of Speed Limit on Norwich Road. The total cost of these works are estimated at £98,250 to be apportioned between this and Norwich Road application (reference 1856/17). This site has been identified to contribute £15,542.50, with the remainder to be sought from 1856/17.

- Public Right of Way improvement – widening and resurfacing of footpaths FP13 and FP14 and Bridleway 009 - £58,125

(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 outline time limit
- Approval of reserved matters – appearance, scale, layout, landscaping
- Approved Plans – broad compliance with parameter plan including location of single storey dwellings
- Phasing Condition (To allow phasing of the development and allows spreading of payments under CIL) (Pre-commencement)
- Market housing mix prior to or concurrent with reserved matters to be agreed
- Removal of permitted development rights for upwards extensions to any single storey dwellings
- Provision of open space and play space, timing of and maintenance and management
- Detailed landscape planting plan, including advance planting, management plan, landscaping scheme and details of SUDS areas
- Road construction and surface water disposal from roads
- Construction management plan (including hours for deliveries and construction works on site)
- Vehicle turning and parking (including cycles and electric vehicle charging points)
- Bin storage
- Travel plan
- Protection of public right of way during construction the development
- Fire hydrants
- Drainage strategy (Anglian Water)
- Surface water drainage scheme including further infiltration testing and two-stage water treatment
- Maintenance and management of the surface water drainage scheme
- SuDS components on LLFA's Flood Risk Asset Register.
- Construction Surface Water Management Plan
- Mineral extraction quantified
- Archaeology – implementing programme of archaeological work
- Ecology protection, mitigation and enhancement, including the provision of Swift boxes, hedgehog fencing and wildlife sensitive lighting
- Level access to enable wheelchair access for all dwellings/buildings
- Tree Method Statement and Tree Protection Plan compliance
- Unexpected contamination
- Energy and renewal integration scheme to be agreed
- Rainwater harvesting to be agreed
- Service ducting for Broadband cables
- On site open space and includes management of the space to be agreed and requirement for public access at all times.

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

- Pro active working statement
- SCC Highways notes
- Works to a watercourse may require consent (Land Drainage Act 1991)
- Any discharge to a watercourse or groundwater comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to watercourse that drains into Internal Drainage Board catchment

may be is subject to payment of a surface water developer contribution

- European Protected Species Licence

(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 if considered necessary.



Application No: DC/18/00861

Location: Land to east of Ely Road, Claydon

Appendix 1: Committee report from 27 th January 2021	See attached	
Appendix 2: Tabled Papers for Committee report from 27 th January 2021	See attached	
Appendix 3: Details of Previous Decision	N/a – although see committee report for previous resolution to defer to Planning Referrals Committee.	
Appendix 4: Further consultee responses received since January 2021	Claydon and Whitton Parish Council NHS England Natural England Suffolk County Council (SCC) Highways SCC Strategic Development SCC Lead Local Flood Authority SCC Mineral Planning Authority SCC Fire and Rescue Place Services Landscape BMSDC Environmental Health (EH) – Air Quality BMSDC EH – Sustainability BMSDC EH – Contamination	



Babergh and Mid Suffolk District Councils



	BMSDC Heritage BMSDC Strategic Housing BMSDC Public Realm	
<i>Appendices from committee report 27th January 2021:</i>		
Appendix 4: Town/Parish Council/s	Barham Parish Council Claydon and Whitton Parish Council	
Appendix 5: National Consultee Responses	NHS England Natural England Suffolk Wildlife Trust Environment Agency Anglian Water	
Appendix 6: County Council Responses	Suffolk County Council (SCC) Highways SCC Strategic Development SCC Lead Local Flood Authority SCC Mineral Planning Authority Suffolk Archaeological Service SCC Fire and Rescue	
Appendix 7: Internal Consultee Responses	Place Services Ecology Place Services Landscape Arboricultural Officer Policy and Infrastructure Environmental Health – Air Quality Environmental Health – Sustainability Environmental Health – Contamination Heritage	
Appendix 8: Any other consultee responses	Suffolk Police	
Appendix 9: Application Site Location Plan	Yes	



Babergh and Mid Suffolk District Councils



Appendix 10: Application Plans and Docs	Yes	
Appendix 11: 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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Committee Report

Item No:

Reference: DC/18/00861

Case Officer: Jo Hobbs

Ward: Claydon & Barham.

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

RECOMMENDATION – APPROVE OUTLINE PLANNING PERMISSION WITH CONDITIONS

Details of Development

Description of Development

Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Location

Land To The East Of, Ely Road, Claydon, Suffolk

Expiry Date: 29/01/2021

Application Type: OUT - Outline Planning Application

Development Type: Major Small Scale - Dwellings

Applicant: M. Scott Properties Ltd, The St Edmundsbury & Ipswich Diocese

Agent: Mr Richard Clews, Strutt and Parker

Parish: Barham and Claydon (split across parishes)

Site Area: 3.37ha

Density of Development:

Gross Density (Total Site): 22 dwellings per hectare (dph)

Net Density (Developed Site, excluding open space and SuDs): 33 dph

Details of Previous Committee / Resolutions and any member site visit: Defer to Mid Suffolk Referrals Committee for reasons outlined 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 - DC/17/04720

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

It is a “Major” application for:

- a residential land allocation for 15 or more dwellings

Details of Previous Committee / Resolutions and any member site visit

This application was considered by Mid Suffolk Development Control Committee A on Wednesday 4th July 2018. Members of the committee resolved to defer to Referrals committee on the following basis:

“- Need to consider accumulated impact of development in conjunction of other housing development proposals in the area, traffic flows and reference to Parish traffic Survey. May need updated SCC Highways response.

And need for:-

- Ensure clear understanding of SCC requests on footpath proposals and provision as a result of the development.
- Confirmation that any mineral allocation is not required
- Clarification of ecological interests and mitigation on site.”

Has a Committee Call In request been received from a Council Member?

None received.

Details of Pre-Application Advice

The site itself has no planning history, although pre-application advice was sought and given in 2017 for a scheme for 74 dwellings which indicated development could be acceptable on the site pending on meeting key planning considerations.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

Core Strategy Focused Review 2012:

- FC1 – Presumption in favour of sustainable development
- FC1.1 – Mid Suffolk approach to delivering sustainable development
- FC2 – Provision and distribution of housing

Mid Suffolk Core Strategy 2008:

- CS1 – Settlement hierarchy
- CS2 – Development in the Countryside and Countryside Villages
- CS3 – Reduce contributions to climate change
- CS4 – Adapting to climate change
- CS5 – Mid Suffolk’s environment
- CS6 – Services and infrastructure
- CS9 – Density and mix (of housing)

Mid Suffolk Local Plan 1998:

- GP1 – Design and layout of development
- HB1 – Protection of historic buildings
- HB7 – Protecting gardens and parkland of historic interest
- HB14 – Ensuring archaeological remains are not destroyed
- H7 – Restricting housing development unrelated to the needs of the countryside
- H13 – Design and layout of housing development
- H14 – A range of house types to meet different accommodation needs
- H15 – Development to reflect local characteristics

H16 – Protecting existing residential amenity
CL8 – Protecting wildlife habitat
CL9 – Recognised wildlife areas
CL11 – Retaining high quality agricultural land
T4 – Planning obligations and highways infrastructure
T9 – Parking standards
T10 – Highway considerations in development
T11 - Facilities for pedestrians and cyclists
T12 - Designing for people with disabilities
T13 – Bus services
RT4 – Amenity open space and play areas within residential development
RT12 – Footpaths and bridleways
SC4 – Protection of groundwater supplies
Altered policy H4 – A proportion of affordable housing in new housing developments (July 2016)

Emerging Joint Local Plan – Pre-submission (Regulation 19) Consultation (November 2020)

Other material policy considerations

Suffolk County Council Parking Standards
Suffolk County Council Minerals Core Strategy 2008 – Policy 5
Suffolk County Council Emerging Minerals and Waste Local Plan (2018) – Policy MS8 and MP10

Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation (2007)

Neighbourhood Plan Status

This application site is not within a Neighbourhood Plan Area.

List of other relevant legislation

- National Planning Policy Framework 2019
- Human Rights Act 1998
- Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
- Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
- The Conservation of Habitats and Species Regulations 2017
- Localism Act
- Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant planning issues that would warrant specific consideration.

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

1st response (March 2018): Object: Ely Road traffic movement; why traffic calming within scheme not on Ely Road; 30% increase in number of household in Claydon and Barham with all development; infrastructure impact; 3 storey out of character; environmental concerns. However if development is required in Claydon and Barham this is a preferred option.

2nd response (February 2019): Object: remain opposed to application for reasons previously stated. Ely Road and Thornhill Road already extremely congested, cars parked on road and buses struggling to travel through estate. Cumulative impact with other developments will strip away village identify and increase traffic dramatically. Proposed development an overdevelopment of the plot, does not retain village feel of the rest of Claydon garden village. Object to private roads in proposals. Concerns regarding water pressure, especially with cumulative development.

3rd response (December 2019): Claydon and Whitton Parish Council remain opposed to this proposal. The minor changes made to the application to not have an impact on the problems with this proposal already highlighted by the Parish Council. The latest proposal (in partnership with 1856/17) shows no improvement to the issues with the roads and excess traffic.

Barham Parish Council

1st response (March 2018): Mixed views - development would be appropriate but local infrastructure and environment a concern. Objects unless concerns mitigated: 1) Roads busy - what are plans to alleviate pressure of additional traffic; 2) Sewer through Norwich Road problems, upgrade to cope with extra demand; 3) How will the Slade be protected, unique in villages to Claydon and Barham; 4) Wildlife in NE corner of site - badgers? Protected and enhanced as part of development.

2nd response (July 2018): THaT consultancy on their behalf: TA doesn't cover Thornhill Road South or beyond Thornhill Road/Ely Road; road network capacity concerns; cumulative impact significant; trip rates lower than 1856/17 application; pavement width at site entrance too narrow; 20 mph on Ely Road; improvements to Thornhill Road for cyclist and pedestrians.

3rd response (March 2019): from THaT Consultancy on behalf of Barham Parish Council: Question whether any revised supporting transport assessment information has been submitted for either this or planning application 18//00861 to support applications, and whether mitigation measures address impacts as a result of the proposed development. It is not clear how Local Highway Authority responded in November 2018 to the application 18/00861 as no further supporting information had been made public. Unclear as to how cumulative impact has been assessed and why 18/00861 requires no mitigation measures, but Norwich Road scheme (1856/17) requires pedestrian and cycle mitigation measures. Local highway network currently operating at or close to, capacity, proposed development will take this over capacity. Continue to also have the concerns of; carriageway width restriction at entrance to Ely Road scheme, Ely Road should become a 20mph road, safety measures for pedestrians and cyclists on Thornhill Road. In relation to Church Lane Barham development suggest a road safety audit is carried out before permission is granted to cover the new highway infrastructure proposed as part of development, sections of the existing highway network that will be operating close or over capacity, access routes between sites and schools and village centre, route along Barham Church Lane and northern outskirts of Ipswich.

4th response (received 3rd and 6th December 2019):

Continue to object to both applications at Ely Road (DC/18/00861) and Church Lane (1856/17):

- Highway concerns are not addressed by additional highways package submitted by developers

- Do not consider measures will benefit local communities or have regard for wishes of local residents/representatives
- Parish Council's views have always been side-lined in favour of the requirements of the developers
- Parish Council has significant concerns with SCC having control of the funds as to date they have not taken onboard the views/concerns of the Parish Council.
- No guarantees strategies will be delivered
- Query how report can claim to promote travel by bus when Suffolk County Council has cut subsidies to bus services in the area which has reduced the number of buses serving Barham.
- Earlier proposals to promote cycling included turning the footpath that runs beside Claydon Primary School into a cycle way, appalled at suggestion and significant concern over conflict with pedestrians.
- Argument to the council mainly based on financial contributions that are deemed to be a benefit to the village.
- Impact of cumulative developments in area
- Contrary to development plan policies – not sustainable growth.
- Approving this would open up to further proposed development to north on Norwich Road.
- THaT Consultancy report June 2018 identified that the existing highway network was not considered adequate to accommodate the cumulative impact of this and wider committed / proposed development. Severe highway impact likely.
- Encroachment to Church, impact on listed red brick wall, development beyond existing village envelope, loss of grade 2 agricultural land and safety of residents, especially children, unacceptable
- Also overcrowded school and GP surgery capacity concerns

5th Response (September 2020)

Further Highway Note from THaT Consultancy acting on behalf of Barham Parish Council. Concludes that concerns consistently raised by THaT Consultancy have not been satisfactorily addressed including:

- Requests for information and clarification previously made have not been answered by either Suffolk County Council or the developers
- County Council have not challenged findings of developers
- Mitigation identified by developers in Technical Note dated November 2019 do too little to improve highway conditions, and would not mitigate the adverse impacts arising from the additional traffic from the propose development.
- Concerns remain over highway safety.

Officer comment: Suffolk County Council Highway Authority have considered the Highway Notes, provided comments below and raise no objection This is covered in paragraph 5.1 to 5.26 and 14.9 of the officer's report below.

National Consultee (Appendix 4)

NHS England

One branch surgery within 2km, not sufficient capacity. Developer contribution required via Community Infrastructure Levy (CIL). No objection.

Natural England

Site within 13km of zone of influence for Stour and Orwell Estuaries SPA. Development likely to have significant effect. Contributions to RAMS would be required.

Suffolk Wildlife Trust

UK Priority Habitats: is hedgerow to be retained or lost? The Slade - buffer to eastern boundary. UK Protected Species: Bats - loss of habitat in hedge, woodland to east not buffered, insufficient info. Lighting impact. GCNs and reptiles: some habitat potential for these species, if it could be lost then insufficient information. Badgers: evidence of badgers but no sett building; suitable habitat to north east within pit area; mitigation would be required. Green space - only a small amount, more needed particularly bordering hedgerows and woodlands; reduce number of dwellings. Habitats Regulations Assessment (HRA) required as within 13km of Stour and Orwell Estuaries Special Protection Area (SPA), HRA needed and consideration to level of contribution to Recreational Access Disturbance Mitigation Strategy (RAMS). Ecological enhancements could be secured e.g. integrated swift nests in buildings.

Environment Agency

Consultation not required

Anglian Water

No assets owned or subject to adoption agreement in site; available capacity in wastewater treatment; capacity in foul sewerage network; surface water strategy to be subject to planning condition and recommend this be subject to consultation with Anglian Water and the Lead Local Flood Authority (LLFA). Proposed condition for drainage strategy.

County Council Responses (Appendix 5)

Suffolk County Council (SCC) Highways

1st response (March 2018): No objections subject to conditions. S106 for bus information sign and improvements to public right of way Barham Bridleway 009 and Claydon FP13 and FP14.

2nd response (April 2018): Revised access drawings acceptable.

3rd response (November 2018): No objections subject to conditions and contribution to widening and resurfacing of footpath adjacent to site. Confirmed no wider cumulative impacts for development to consider.

4th response (December 2019): No objection subject to conditions and contributions secured via S106 agreement.

The proposal for 73 dwellings would create approximately 43 vehicle movements within the peak hour (1.3 vehicles every minute) therefore the additional vehicles from the development will not affect the capacity of the highway network in the area. There are bus stops within 200m of the site with good public transport services. The catchment primary school is approximately 650m from the site. The mitigation measures for footway improvements between the site and the primary school to create a safer route for the vulnerable user. The proposed mitigation measures to be funded by this and Norwich Road, Claydon application will provide highway improvements for cyclists and pedestrians in Claydon Village.

The development would not have a severe impact on the highway network (NPPF para 109).

S106 contributions to be secured include:

- Offsite improvement works by resurfacing and widening of Barham Bridleway 009, Claydon FP13 & FP14 (approx. 750m length) totalling £58,125.00.
- Village Highway Mitigation Measures:
 - o Station Road / Norwich Road Junction and footway improvements
 - o Church Lane / Norwich Road Junction and footway improvements
 - o Village Wide Cycle Infrastructure Improvement Works

- Norwich Road extension of Speed Limit on Norwich Road
- The total cost of these works are estimated at £98,250 to be apportioned between this and Norwich Road application (reference 1856/17).
- CIL payments would secure real time passenger information display screen at a cost of £13,000

SCC Strategic Development

CIL for secondary school places, libraries. Section 106 contribution for primary school places and primary school build cost. Condition for fire hydrants.

SCC Lead Local Flood Authority

No objections subject to conditions. Infiltration possible, water treatment to be two-stage.

SCC Mineral Planning Authority

No objections, site not suitable for extraction due to close proximity to existing dwellings. Request condition to ensure any mineral extracted from site during construction process is quantified.

Suffolk Archaeological Service

1st response (March 2018): Area of prehistoric, Roman and Anglo-Saxon settlement. Assessment needed before any recommendation made on application.

2nd response (received February 2019 although dated February 2018): High potential for discovery of below-ground heritage assets. As recommended in our earlier advice metal detecting and geophysical surveys have taken place. Based on the results of these surveys, there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. Conditions are requested to agree a programme of archaeological work and site investigation and post investigation assessment.

Suffolk Police

Recommend using Secured by Design; concern over parking design; concern over permeability with footpaths and offenders being able to move easily; eastern boundary - looking for no gaps in vegetation; boundary treatment - 1.8m fences around residential properties; further details on bin storage, attenuation area fencing, undeveloped areas use, recessed doors on houses, fence of gable walls to prevent anti-social behaviour, vegetation management, lighting, 1m hooped metal railings around communal areas, open space/play equipment and other items such as front doors to meet relevant British Standards.

SCC Fire and Rescue

Required to meet Building Regulations and go further for vehicle hardstanding capacity. Fire hydrants required through condition. Flow rates need to be checked with Water Companies.

Internal Consultee Responses (Appendix 6)

Place Services – Ecology

1st response (March 2018): Insufficient info to allow Local Planning Authority (LPA) to prepare HRA in relation to disturbance of Natura 2000 sites. Insufficient info to provide certainty of impacts to protected species and priority species/habitats. 2.6km daily walking route and contribution to RAMS. Bats, Great Crested Newts (GCNs) and reptiles - habitats removed in indicative layout, Ecological Impact Assessment required and surveys to inform this, buffer to woodland and hedgerow removal needs mitigation.

2nd response (October 2018): Holding objection as insufficient info for HRA and no appropriate buffer to Mixed Lowland Deciduous Woodland. Sufficient info on GCNs however.

3rd response (February 2019): No objection subject to conditions to secure: a) Mitigation towards visitor management measures at the Stour & Orwell Estuaries SPA & Ramsar site, from the development alone and in combination of other plans and projects; b) ecological mitigation and enhancements. There is sufficient ecological information submitted to assess the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

Place Services – Landscape

1st response (March 2018): More info to address relationship and mitigation between development site and surrounding area, inc. Hereford Drive. Specific scale sections; Landscape Visual Impact Assessment (LVIA) not consideration of cumulative impacts with application 1856/17; Reduce dwellings to create landscape buffer to north and east, enhancements along Public Rights of Way (PROW) and woodland which will also reduce the impact of the existing settlement boundary; Landscape strategy required, including opportunities for habitat creation; Detailed landscape planting plan, maintenance and specification. Condition 5 year maintenance and Sustainable Urban Drainage Systems (SuDS) in Landscape Management Plan (LMP); Detailed boundary plan condition; drainage feature does not connect to landscape; LVIA completed to appropriate guidance but greatest visual impact to footpath E120 009/Y and Winchester Gardens and Hereford Drive and proposed dwellings not mitigated, no landscape buffer between PROW and dwellings on northern boundary; Development will negatively impact on nearby dwellings and heritage assets, landscape enhancements needed; site in Rolling Estate Farmland Landscape Character Area, due to enclosure pattern of area expect landscape area enhanced, estate features and woodland planting safeguarded.

2nd response (February 2019): No objections subject to conditions. Welcome changes made to sketch layout and revised LVIA to consider cumulative impacts. The assessment is considered acceptable and has concluded that the only visual receptor likely to experience cumulative effects was the users of Public Footpath E120/009/X through a sequential experience of both developments (this and nearby 1856/17 – 269 dwellings on Church Lane, Barham). However, it's thought that by amending the layout there are more opportunities for landscape enhancements along this route. Whereas in terms of landscape, there is a slight adverse cumulative landscape effect upon the arable character of the Site and Claydon.

Babergh and Mid Suffolk District Councils (BMSDCs) Arboricultural Officer

Arboricultural Impact Assessment required within application. Arboricultural Method Statement and Tree Protection Plan could be conditioned.

BMSDCs Policy and Infrastructure

Support the application and proposed development.

BMSDCs Environmental Health - Air Quality

Unlikely to result in a deterioration of good air quality in area.

BMSDCs Heritage

No comments to make

BMSDCs Environmental Health Sustainability

No objection, condition sustainability considerations. Sustainability and Energy Statement submitted to reduce environmental impact during construction and occupation. Environmentally friendly materials, construction techniques, reduce carbon dioxide, reduce water use to 105 litres per person per day and consider electric vehicle charging points.

BMSDCs Environmental Health Contamination

No objections from land contamination, unexpected contamination condition required.

B: Representations

At the time of writing this report at least 22 letters/emails/online comments have been received. It is the officer's opinion that this represents 19 objections, 1 support and 2 general comment. A verbal update will be provided as necessary.

Views are summarised below:-

Letter of support/comment

- Will noise and delivery restrictions be put in place during construction due to limited access of only one road, and will Ely Road be repaired after construction?
- Believe attention must be paid to existing trees and hedges, and maintained. Welcome additional planting, ponds and other habitats
- Existing pressures on local wildlife, need to ensure not adversely affected by development
- Loss of field deter swifts, house martins and bats from foraging, disturbance closer to established hedgerow along bridleway.
- No mention made of migratory geese using villages outlying fields, no mention made of this
- Current plans look appealing, need to address above points to make development enhance village life for residents.
- Development appears to be in a place and of a scale that is in keeping with the existing housing area.
- Pleased to see some informal areas included and more than one vehicular access

Objections

Principle

- No further housing developments wanted or needed
- Size and scale of development
- Urban sprawl, Great Blakenham destroyed by development, same happening to Claydon/Barham
- Piecemeal development
- Cumulative impact with and on adjacent application 1856/17 (land at Norwich Road, Claydon) not considered
- Impression Council wanted site to be developed
- Development of Ipswich Garden Suburb and Northern By-Pass both due to happen and needed, but will impact on Claydon and plan should be to protect village identity, where will by-pass be?
- Why is field next to Church Lane not being developed first as it has better access?
- Will properties be purchased by local people?
- Applications that have a severe effect on local people should be decided by including people from local area.
- Small development in each parish would meet housing need, and keep local services running
- Concerned at recent applications in Claydon and Barham
- No benefits of development for residents of Claydon or Barham
- Why are new estates allowed to be built with poor infrastructure in first place, demonstrated by year after year of increased Council Tax because of lack of funding
- Please consider resident's concerns and lovely villages before lost forever
- Price of affordable housing

Roads

- Roads need to be improved, increase traffic on Ely Road, effect on A14 considering Ipswich Northern Route
- Increase use of Church Lane and driving through village itself
- Applicant misunderstood comments on traffic access, future residents likely to use cars to access A14
- Roads should be resurfaced, tree roots should be removed from roads
- No visitor parking, question trip rates in Transport Statement
- Has not demonstrated traffic impact not severe
- Road condition poor
- No parking available after 6pm on roads
- Parking of workers during construction phase
- Road capacity with new dwellings
- Road width on Ely Road with residents parking on street can't cope with traffic to be generated during construction and once occupied
- Road safety, particularly around school runs on Thornhill Road
- Bungalows on Ely Road require parking spaces for care providers, no driveways and so on road parking, construction vehicles would struggle to pass.
- Residents of Thornhill Road only have on-block garages and park on Ely Road
- Parking on proposed dwellings only sufficient if residents use garages
- Additional traffic will increase noise and air pollution, and wear and tear of roads and disturbance to resident's lives
- Village is very busy, trying to park at local shops almost impossible
- Ely Road, Edinburgh Gardens and York Crescent not wide enough, narrowed by parking and cannot cope with extra traffic
- Development would restrict bus routes particularly during school collections/drop-offs
- Roads on new housing estate too narrow, parking on Ely Road will lead to emergency services not being able to get through
- Existing problems with local roads not taken into account
- Traffic – from parents taking children to schools not necessarily in Claydon
- Buses being able to travel through parked cars
- Concern over narrowing road outside resident's houses, why not narrow roads within development, will increase noise and pollution
- Air pollution – suggest another access point or reduce homes
- Traffic survey took no account of increased volume through other roads to join the main road or other planning application in Claydon, leading to congestion back to A14 junction.
- Access via one access questionable.
- Vehicular route new residents will take would go past school which already a problem area.
- Additional cars and parking is already an issue, with residents from Hereford Drive and Edinburgh Gardens parking on Ely Road
- Road safety for children

Wildlife

- Damage to wildlife and wildlife corridors at The Slade from lighting, noise and movements
- Adverse impact on open countryside and wildlife
- The Slade is important habitat for wildlife, hedge through site important wildlife corridor and should be protected
- A Badger Sett, deer, brown hares, stag beetles, deer, bird life, badgers, Great Crested Newts and bats on or near site, disturbance of building will adversely affect wildlife haven

- Impact on wildlife and removal of parts of hedgerow
- Disused pit contains burrowing wildlife, Great Crested Newts on site, and is not safe to have gardens adjacent to it

Services

- Claydon Primary School full, other planned development will fill proposed extension to school
- Why was school at Blakenham Fields not built?
- Infrastructure and road system needs to be in place before housing is planned.
- Strain on local utilities such as sewage system
- Extra burden on local doctors, dentists and services
- Do not believe new doctor's surgeries or schools will be built
- School capacity
- Villages overcrowded, amenities stretched
- Local tips closed

Amenity

- Loss of outlook, view of fields and woods
- Loss of privacy - land levels rise to north east of site, making development over-bearing, leading to loss of privacy and car lights shining into bedroom windows.
- Proposed new footpath would have unacceptable impact on privacy of residents
- Loss of outlook and daylight
- Noise and light pollution to residents of Hereford Drive
- Noise, disturbance and fumes from new development and cars
- What will levels of land once developed be?
- Scale of development/Bungalows could be better placed behind low houses of Winchester Gardens
- Why are largest houses on highest part of site?
- Design should be similar to rest of village
- Object to social housing at entrance to estate as over two storey, impact on privacy
- Request consultation on hours of construction and movement of large equipment.

Other matters

- Loss of agricultural land, part of village identity
- Archaeological impact
- Old Roman road route along footpath to north of site.
- Flooding off site from The Slade behind Glebe Way, flooding properties near bus stop in Thornhill Road
- Safety of water feature, will it be managed or become stagnant
- Concerns about public drainage and water systems
- Anglian Water flushing point outside of house

(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: DC/18/00861

Outline Planning Application (with means of access to be considered) - Erection of up to

DECISION: Pending Decision

73 dwellings, public open space and supporting site infrastructure including access.

And on land directly to south of application site

REF: DC/19/01281	Planning Application - Erection of 9no. bungalows including associated works, car parking and garaging.	DECISION: Withdrawn
REF: 0646/01	Temporary builders' compound and topsoil storage area including the construction of a new vehicular access associated with proposed development site adjacent.	DECISION: Approved

PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

- 1.1. The application site comprises (Grade 3) agricultural land on the eastern fringe of Claydon, which is designated as a Key Service Centre in the Core Strategy.
- 1.2. Claydon contains a number of services and facilities including a local convenience shop, primary school, secondary school and community/village hall.
- 1.3. The site is surrounded by residential development to the west and woodland to the east. The northern and southern boundaries contain hedgerows that form the field boundaries, with a further agricultural field to the north and rough grassland to the south. The site currently comprises two agricultural fields which are divided by a hedgerow. The site abuts the village settlement boundary on its western side. The site is within both parishes of Claydon and Barham, with the boundary of the parishes running along the retained hedge that traverses the site east to west.
- 1.4. The site is not highly visible from the wider area, but is visible from Church Lane to the north of the site, and from dwellings along Winchester Gardens, Ely Road and Hereford Drive.
- 1.5. The site is not in, adjoin or near any Conservation Area. There are no nearby listed buildings, the closest being the Grade I Church of St Mary's and St Peter's located on the north side of Church Lane some 280m northeast of the site. The Grade I St Peter's Church tower is visible when viewing this application site from the surrounding area (i.e. when standing within the adjacent application site 1856/17 on Norwich Road). The site is not in an area of special character designation such as an Area of Outstanding Natural Beauty or Special Landscape Area, but is within the Site of Special Scientific Interest (SSSI) Impact Risk Zone. Nor is the site adjoining, or in proximity to, any designated landscape areas of special significance. The site is within the Mineral Consultation Area set by Suffolk County Council's Minerals Core Strategy 2008.
- 1.6. The site was submitted for development under the Babergh and Mid Suffolk Joint Local Plan Consultation (August 2017) exactly as per this application (3.37ha). The JLP has incorporated it into a larger parcel stretching slightly south and north to Church Lane. This identified the larger site (SS0861 - 6.2ha) as suitable for residential development through the Strategic Housing and Employment Land Availability Assessment.

- 1.7. The site measures 3.37 ha and is located entirely in Flood Zone 1. Public Rights of Way run along the site's northern boundary (Bridleway 15052 linking Thornhill Road to The Slade) and the eastern boundary (Footpath 3553) running alongside the site through The Slade).
- 1.8. Ely Road is a cul-de-sac, although Winchester Gardens is accessed via Ely Road. Ely Road joins Thornhill Road to the west of the site. This road is currently a bus route for a regular service from Ipswich to Stowmarket during the daytime on Mondays to Saturdays.
- 1.9. On the north boundary of the site is a protected oak tree (TPO ES61/T5) and a protected group of three oak trees to the north west of the site (ES61/G4).
- 1.10. To the north, outside of the site boundary, is a disused 19th Century chalk pit which has not been filled in.
- 1.11. The site has been identified for allocation in the emerging Joint Local Plan – Pre-submission (Regulation 19) Consultation (November 2020), as part of a wider development site stretching further north to Church Lane and south of the application site. This site is proposed to be allocated for 75 dwellings (reference LA003). At present this document gives an indication of the direction of travel of the council's potential future site allocations and consideration that the site is deliverable with the proposed development. For the purposes of this decision in planning terms this document has limited weight at the present point in time.

2. The Proposal

2.1. The application is for outline permission for 73 residential dwellings with all matters reserved except access, which is proposed from Ely Road. To demonstrate the site (3.37ha) is capable of accommodating 73 dwellings and indicative site layout plan and supporting information has been submitted. This includes:

- Vehicular access via Ely Road;
- A traffic calming feature will ensure slower movement between the proposed development and existing streets;
- Pedestrian access from Ely Road but also to several points along the footpaths and bridleways surrounding the site, including The Slade;
- 73 dwellings comprising of 8 flats, 8 bungalows and 57 houses, split into two locations separated by open space and the retained hedge on site;
- Open space and play areas – 2672sq.m. and 901sq.m. areas;
- 25 affordable dwellings (35% of total) in three locations;
- Single storey units to the south and south east boundary of the site;
- Landscape buffer to the west boundary;
- Rough grassland buffer to the north, east and south boundaries;
- Pond feature for protected species enhancement to the south west of the site;
- Badger exclusion zone to the north east adjacent to The Slade.

2.2. The layout plan is indicative only, but has demonstrated how parking and garaging arrangements can meet the required Suffolk Parking Standards, although this would be a matter detailed at the Reserved Matters stage.

2.3. The resultant gross density of the scheme is 22 dwellings per hectare, and net density excluding areas of open space of 33 dwellings per hectare. For comparison the gross density of development at Hereford Drive and Exeter Road is 24 dwellings per hectare. By comparison gross density of development around Ely Road and Winchester Gardens is around 28 dwellings per hectare.

2.4 Since the application was last considered by Mid Suffolk Planning Committee A in July 2018 there have been the following changes to the scheme to address the Members identified concerns:

- Further indicative information to support this outline application has been provided to demonstrate the quantum of development can be accommodated on the site. The proposals have been reduced from 74 dwellings to 73 dwellings.
- Further ecological reports were carried out and mitigation and enhancement measures identified.
- A cumulative effects in terms of highways of this application and planning application 1856/17 on Norwich Road, Barham also pending consideration by the council.
- Clarification is also provided in this report on the public rights of way improvements proposed to be secured and clarification from Suffolk County Council Minerals and Waste team on safeguarding minerals on the site.

3. The Principle Of Development

3.1 The starting point for any planning decision is the development plan, as identified in Section 38(6) of the Planning and Compulsory Purchase Act 2004. Determination of any application must be made in accordance with the plan unless material considerations indicate otherwise. A key material consideration regarding the principle of development is the National Planning Policy Framework (NPPF) 2019.

3.2 This application site is outside of the settlement boundary for Claydon and Barham but directly adjoins the existing settlement boundary for Claydon. As identified earlier, the site sits both within the parishes of Claydon and Whitton and Barham. The site is greenfield land and is in agricultural use. Relevant local plan policies are policy H7 which seeks to restrict housing development unrelated to the needs of the countryside, and core strategy policy CS1 which identifies a settlement hierarchy and CS2 which also seeks to resist development other than those listed in the policy. The NPPF has changed direction since these policies were adopted as detailed further below, so as to affect the weight of these policies in determining this application.

3.3 The Core Strategy Focused Review (2012) identified this change in line with the National Planning Policy Framework. Reflecting this policies FC1 – Presumption in favour of sustainable development and FC1.1 – Mid Suffolk approach to delivering sustainable development identify a more positive approach to proposed development.

3.4 It should be noted however that policy FC2 – Provision and distribution of housing seeks to identify the number of dwellings in Key Service Centres that should come forward on greenfield sites, 100 between 2017 to 2022 and 200 from 2022 to 2027.

3.5 The NPPF identifies in paragraph 213 that the weight attributed to policies should be according to their degree of consistency with the NPPF. The closer the aims of the policy are to the NPPF the greater the weight that can be attributed to them.

3.6 The NPPF also identifies that planning decisions should apply the presumption in favour of sustainable development (paragraph 11):

“For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed*

- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

3.7 Footnote 7 of the NPPF confirms that “out-of-date” includes the situation where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was less than 75% of the housing requirement over the previous three years. In this instance the Council can demonstrate a sufficient land supply, as shown in the Mid Suffolk District Council Housing Land Supply Position Statement 2019/2020 – 2023/24. This is a material planning consideration, but first the weight attributed to policies in the development plan must be ascertained.

3.8 The policies most important for determining the application are policy H7 of the local plan, CS1 and CS2 of the Core Strategy and FC2 of the Core Strategy Focused Review. These are considered to carry less weight as they are not entirely consistent with the aims of the NPPF. Policy FC1 of the Core Strategy Focused Review repeated the requirements of the former paragraph 14 of the NPPF (2012), which is replaced now with paragraph 11 (NPPF 2019) which is the more relevant consideration, and so this policy is given less weight. Policy FC1.1 seeking to conserve and enhance the local character of different parts of the district, is up-to-date and relevant to this application. These two policies seek to promote the principles of sustainable development.

3.9 Therefore with regard to the Housing Land Supply Position Statement (October 2020), even in the presence of a sufficient land supply these key policies cannot be given full weight. Therefore paragraph 11d) of the NPPF presumption in favour of sustainable development should apply in this instance given the above considerations, except for the provisions of paragraph 177 of the NPPF.

3.10 The site is subject to a Habitats Regulations Assessment (Appropriate Assessment). Paragraph 177 of the NPPF identifies that if development requires appropriate assessment and there are likely significant effects because of its potential impact on a habitats site, the presumption in favour of sustainable development cannot apply. It should be noted that there are not considered to be likely significant effects from this development, as outlined further in the ecology section to this report, and so the presumption in favour of sustainable development does apply to the proposed development on this basis.

3.11 It cannot be ignored that the policies most important for determining the application do not accord with the NPPF. Therefore less weight should be given to these policies as identified above. Whilst tension with the adopted development plan exists and is noted, that tension is considered to be less significant in the decision making balance, in light of the lesser weight afforded to the most important development plan policies relevant to this application where they are not consistent with the NPPF.

3.12 Therefore an assessment against the adopted development plan has been undertaken, considering the material consideration of the NPPF and the purpose of the planning system to contribute to the achievement of sustainable development. The conclusion to this report will then consider whether the development should be approved, and whether the harms of approving would be outweighed by the benefits of the scheme.

4. Nearby Services and Connections Assessment Of Proposal

4.1. As noted in the introduction to this report, the site is located on the edge of the settlement boundary of Claydon. Claydon itself has a number of services and public transport connections to Ipswich and Stowmarket.

4.2 The site itself would have footpath access to the existing road network where there are footpaths where pedestrians can walk into the village centre or to bus stops.

4.3 Whilst there are a certain number of services in the village such as shops, schools, doctors and a community centre, future residents of this development would still be likely to use private car to travel for the purposes of employment and leisure uses. The site is close to the A14 and Ipswich Fringe and so cycling would be possible reducing that demand on private car use compared to some other areas of the district. Whilst around 7-8km from the site there are also train stations at Needham Market and Westerfield providing sustainable transport links to the wider transport network.

4.4 The site is therefore considered to be relatively well connected and a sustainable location for this further development, and is considered to promote inclusive communities as required by paragraph 91 of the NPPF.

4.5 The NHS were consulted on and responded to this planning application, and identified there was one branch surgery within 2km but there was not sufficient capacity for this additional development. However subject to requesting Community Infrastructure Levy (CIL) monies to mitigate this there was no objection from the NHS.

4.6 The proposed development is therefore considered to be in a location on the edge of Claydon where the need to travel is reduced to some degree, meeting the requirement of policy CS6 of the Core Strategy and in a location to support the existing bus network in line with policy T13 of the local plan. These development plan policies are considered to carry full weight as their aims align with paragraphs 91 and 103 of the NPPF, which also seeks significant development to be located where it limits the need to travel, offers a genuine choice of transport modes and promotes social interaction. The provision of other infrastructure is considered further in section 11 of this report below on Planning Obligations and CIL.

5. Site Access, Parking And Highway Safety Considerations

5.1. The proposed development of 73 dwellings has been considered in terms of impact on the wider road network through the Transport Statement submitted with the application. The site access through Ely Road and connections to the wider road network have been considered for road capacity and highway safety, as required by local plan policy T10 and paragraphs 108 and 109 of the NPPF. Paragraph 111 of the NPPF also seeks Travel Plans for development that generate significant amounts of movements. The local plan policy is considered to align with the NPPF and so is given full weight.

5.2 The impact on the wider road network was concluded to be negligible in the Transport Statement. Throughout the course of the application the cumulative impact of this development in association with other development has been considered and discussed further with the applicants. Concern was raised by Members at Development Control Committee where this application was first considered, that the cumulative highway impact of this application and the following planning applications currently being considered was not addressed:

- 1856/17 – Land off Norwich Road, Barham
- 18/00233 – Land to East of The Street, Bramford
- 18/02010 – Land East Side of Bramford Road, Sproughton

5.3 The Highway Authority carried out analysis of the applications Transport Assessments/Statements which indicated significant delays at a number of junctions in Claydon and Sproughton and all applicants were asked to enter into a cooperative approach to consider any mitigation measures.

5.4 Following further analysis it was determined that the sites in Claydon and Barham are too geographically detached by the A14 to give rise to significant impacts on the junctions in Bramford/Sproughton, and vice versa.

5.5 Further analysis of the Transport Assessments/Statement for this application and application 1867/17 on Norwich Road showed this application (Ely Road) would lead to predicted queue lengths on Station Road and Church Lane of 1 vehicle or below during the peak hour periods. Therefore no mitigation was considered appropriate for this development and that there would be no adverse impact on highway safety and the residual cumulative impact on the road network would not be severe. The highway authority is content with all other matters, including the road widths considering existing resident parking on the roads in the vicinity of the site. Subject to conditions on road construction and surface water disposal from roads, construction management plan (including hours for deliveries and construction works on site), vehicle turning and parking (including cycles and electric vehicle charging points), bin storage, travel plan and protection of public right of way during construction the development is considered to be acceptable in highway terms.

5.6 Concerns raised by Members at the last committee where this application was considered included the cumulative highway impact of this development with the proposed development on Norwich Road in Barham for 269 dwellings, primary school site and doctor's/community building. Since this last committee meeting the applicants for this application have sought to address that concern as detailed in the following section.

Further cumulative highway assessment

5.7 To address the concern of Members and of Barham and Claydon and Whitton Parish Councils the applicants have undertaken further work to assess the cumulative highway impact of both proposed developments at Norwich Road and this application. This work has sought to understand the issue, engage with both parish councils and identify further mitigation measures.

5.8 The applicants have met with the parish councils to understand their concerns relating to these planning applications and later to present further proposed mitigation measures. The improvements to Church Road Claydon/Norwich Road junction and the Station Road/Norwich Road junction, both in Claydon, have been discussed with the parishes.

5.9 During these discussions with the parish councils it was clear that there were concerns over the wider traffic issues in Claydon and Barham, and traffic passing through the villages to the A14. It must be noted that the development Members are considering today can only be required to mitigate its own impacts, and cannot be required to resolve wider highways issues in the area.

5.10 Since Members considered these proposals in 2018, draft route options for the Ipswich Northern Route had been published, but more recently in early 2020 Suffolk County Council's Cabinet voted to not proceed with those proposals, and so they hold no weight in terms of the decision being made by Members in relation to this application.

5.11 Following the initial engagement with the parish councils, the developers considered the feedback given at the meetings and produced revised plans for highway improvements for pedestrians and cyclists in Claydon. It must be noted that whilst more significant highway improvements were suggested such as traffic lights at key junctions in Claydon, this application can only seek to mitigate the impacts it has.

5.12 The additional queuing identified above would lead to an impact on the ability of pedestrians and cyclists to safely move through Claydon. For this reason improvements have been put forward on the above two key junctions in Claydon and in the wider area. These are detailed further below.

5.13 The following highway improvements has been secured in relation to this application:

S106 contribution of £58,125 to improve public rights of way

Improved pedestrian and cycle links to the west of Claydon

Provision of dropped kerbs on Ely Road and Thornhill Road to improve pedestrian access to schools

Improvements to Station Road/Norwich Road junction including;

- Widening of existing footways on Station Road on the approach to the junction to allow cyclists to leave the carriageway and use dedicated cycle crossing points;
- Providing a new uncontrolled cycle crossing on Station Road; and
- Upgrading the existing pedestrian crossing on Station Road with new dropped kerbs and tactile paving.

Improvements to Church Lane Claydon/Norwich Road junction including;

- Upgrading the existing uncontrolled pedestrian crossing with new dropped kerbs and tactile paving;
- Widening the existing footway to 2m with maintainable highway land (from Church Lane junction to the existing bus stop and shelter located to the south of the junction);
- Ensure visibility by trimming vegetation (and possible removal of tree to clear visibility splay); and
- Restrict parking on Church Lane during peak periods on road between Drury Road and Church Lane/Norwich Road junction approach or parking to be removed completely.

5.14 In addition to this the application at Norwich Road (1856/17) would also secure S106 contribution of £115,500 to improve public rights of way, creation of new road to north of village between Norwich Road and Barham, improved pedestrian and cycle links to the north of Claydon, improved pedestrian access to Barham Church from Claydon and a proportionate contribution to the above works to the junctions in Claydon and the cycle network.

5.15 The above proposed highway measures are considered to promote walking and cycling in the village, provide a safe route to schools for new and existing residents and ensure pedestrian and cyclist safety.

5.16 The Local Highway Authority (LHA) have responded to confirm no objection to the revised highway improvement package to be secured through a S106 agreement, and continue to note that the site is in an accessible location, that the development would not affect the capacity of the wider highway network in the area and that the proposed mitigation measures to be funded by this and Norwich Road, Claydon application will provide highway improvements for cyclists and pedestrians in Claydon Village. The LHA continue to note that the development would not have a severe impact on the highway network, as required by paragraph 109 of the NPPF.

5.17 The S106 is now in an agreed draft form, with contributions to be secured including:

- Offsite improvement works by resurfacing and widening of Barham Bridleway 009, Claydon FP13 & FP14 (approx. 750m length) totalling £58,125.00.
- Village Highway Mitigation Measures:
 - o Station Road / Norwich Road Junction and footway improvements
 - o Church Lane / Norwich Road Junction and footway improvements
 - o Village Wide Cycle Infrastructure Improvement Works
 - o Norwich Road extension of Speed Limit on Norwich Road

The total cost of these works are estimated at £98,250 to be apportioned between this and Norwich Road application (reference 1856/17). This site has been identified to contribute £15,542.50, with the remainder to be sought from 1856/17.

5.18 From an officer's perspective it is considered that the applicants have carried out meaningful engagement with the parish councils as part of looking to address any cumulative impacts from the two proposed developments. Whilst not all of the highway issues can be addressed it is not considered reasonable to require the developers to go any further than the measures outlined above as these relate to existing highway issues in Claydon and it is not reasonable to require them to resolve these. Subject to no further comment from the LHA but noting they previously raised no objection, the proposed highway mitigation package is considered to be a positive aspect to this scheme and is considered to adequately mitigate the development's impact and go further to provide improvements for cyclists and pedestrians in Claydon.

5.19 Highways England have been consulted and raised no objection in terms of the impact on the trunk road A14 and its junction 52.

On site access and other highways matters

5.20 The vehicular access to the site would be via Ely Road, with pedestrian access to Ely Road and to the wider footpath network as outlined above.

5.21 The design of the road at the access was amended earlier in the application, to now provide a road narrowing which would form a traffic calming feature to slow traffic. The road proposed would be 5.5m wide with a 2m pedestrian footpath either side. The pedestrian footpath would be continuous from Ely Road into the site on the north side of the road, but due to land being outside of the applicant's or Highway Authority's ownership there would be a break of around 4m in the footpath between the application site and Ely Road on the south side of the road.

5.22 Whilst the development is only at outline stage, it is important to ensure an adequate amount of parking can be provided on site for the proposed number of dwellings in line with policy T9 of the local plan and the adopted Suffolk Parking Standards. This development plan policy is given full weight as it is considered to align with paragraphs 105 and 106 of the NPPF in providing minimum parking space standards unless compelling reasons justify otherwise. The dwelling mix shown does provide adequate parking for residential dwellings. There is dedicated visitor parking, with 15 additional spaces shown in overprovision of parking on residential plots and 4 additional space off plot totalling 19 visitor spaces. Therefore it is considered the would be sufficient space to accommodate the visitor parking too. It is noted that there is triple-tandem parking on plots 18, 32 and 33, which is identified in the current Suffolk Parking Standards as not being an acceptable form of parking. This application is however at an outline stage and it is considered this can be designed out at the reserved matters stage. This in itself is not considered sufficient grounds to raise concern on the ability to design an appropriate scheme for 73 dwellings at the reserved matters stage.

5.23 Sufficient cycle parking for two cycles per dwelling plus visitor cycle parking could be provided within garages of houses/bungalows or through covered and secure storage units in rear gardens of flats. This would be secured at the reserved matters stage. Also refuse bins could be stored in rear gardens, with refuse storage and collection areas being designed into the reserved matters. A condition would be used to secure these to an appropriate design and location.

5.24 The proposed development would have a direct impact on the public rights of way network around the site. From a perspective of recognising the importance of promoting health lifestyles, the improvements to the quality of the public footpaths and bridleway is a benefit, giving potential for recreation and providing green links. A contribution is being sought via a S106 agreement to widen and resurface a total of 750m of Barham Bridleway 009 and Claydon Footpaths FP13 and FP14. The impact on the character of the landscape when experienced from the public footpaths is described below.

5.25 The highway authority has considered the transport assessment carried out by consultants on behalf of the Parish Council. This report raises no issues regarding highway impact that has not already been considered by the highway authority. The highway authority raise no objections subject to mitigation measures outlined to be secured by condition and S106 agreement.

5.26 The proposed development is therefore considered to meet the requirements of paragraphs 108 and 109 of the NPPF and policy T10 of the local plan ensuring there is not a severe impact on the road network, provision of safe access and egress from the site, the safe and free flow of traffic and pedestrian safety, suitable capacity in the road network, adequate parking and turning for cars and service vehicles and pedestrian and cycle links.

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

Landscape

6.1. The site is located on the edge of the existing settlement boundary, and as noted above is relatively well screened from the surrounding area. The site is in the "Rolling Estate Farmland" Landscape Character Area. The key visual impacts will be for the existing residents along Ely Road, Hereford Road and Winchester Gardens, and people using Bridleway 009 along the north boundary of the site. The site is also visible from higher land along Church Road.

6.2 The site is not located within any landscape designation. Core Strategy policy CS5 also seeks to protect and conserve landscape qualities and encourage development that is consistent with the overall character of the area. These policies are considered to align with paragraph 170 of the NPPF which seeks to protect and enhance valued landscapes and recognises the intrinsic character and beauty of the countryside, and so can be given full weight.

6.3 The development would have some landscape impact, as identified by the Landscape Visual Impact Assessment submitted with the application. The cumulative impacts with the nearby proposed development at Norwich Road (application reference 1856/17) were assessed. The site of 1856/17 is near this application site, but is physically separated by Church Lane Barham and a field that adjoins this application site. It was found there would be a slight adverse cumulative impact to the arable character of the site and the wider setting of Claydon from the proposed developments. As this is only slight however it is not considered to lead to a significant harm.

6.4 However two Major/Moderate adverse impacts would occur. The impact on the landscape character when viewed from Bridleway 009 along the north western boundary of the site and the visual impact on views for the residents of Winchester Gardens and Hereford Drive would be interrupted by the proposed development.

6.5 The application is only at outline stage at present, but an illustrative masterplan has been submitted with the application. Through discussion and negotiation on this application the applicant has sought to mitigate and reduce the above impacts. The revised masterplan seeks to ensure there is a landscape buffer along the west boundary of the site to the rear of dwellings on Winchester Gardens. An area of open space to the south west of the site also seeks to put some distance between the existing.

6.6 Regarding the impact from Bridleway 009 within the site, it was found there would be an impact both from the proposed development here and also cumulatively with the above proposed development at Norwich Road.

6.7 Whilst users of this Bridleway may view both this and the proposed development at Norwich Road, given the visual separation between the two (i.e. the undeveloped land south of Church Road to remain as such), the level of adverse visual impact would not increase if both sites were to come forward.

6.8 The visual impact from the bridleway has been mitigated to a degree through amendments to the indicative masterplan. The proposed development previously backed onto this bridleway, which would not only have vastly reduced the outlook for walkers along this route, but also created a poorly overlooked space. The development has now been redesigned to face the public bridleway with an area of rough grassland buffer in between the path and proposed development, with only two small sections of rear garden fence. This has moved the development further back from the bridleway.

6.9 The amendments have gone some way to address the previous Major/Moderate adverse impacts from both the bridleway and existing residential dwellings neighbouring the site. There remains however Major/Moderate adverse visual impacts, leading to conflict with policy CS5 of the core strategy which seeks to protect and conserve landscape qualities. The extent and location of this landscape impact must also be considered. The adverse impact is experienced from a section of public footpath within the site and for some residents of the existing development with dwellings backing onto the site. Whilst this is a notable impact it does only occur for a short section of this wider public right of way and for some residents of Claydon. The impact should not be ignored, but the number of people/extent of area where this adverse harm is experienced must be identified when weighing the harm. The council's landscape architect advise that they welcome the changes to the layout and that the assessment is acceptable. This is considered in the wider balance in the conclusion of this report.

Trees and hedges

6.10 There is a protected oak tree within the hedgerow that forms the northern boundary of this site (TPO ES61/T5) and a protected group of three oak trees to the north west of the site (ES61/G4). The proposed development is at a sufficient distance to not impact on the root protection area of the group of protected oaks to the north west of the site. The Arboricultural Impact Assessment (AIA) also demonstrates that no development or road surface will be within the root protection area of the oak tree (TPO ES61/T5) on the north boundary of the site.

6.11 The AIA also demonstrates that the proposed development is set back from the trees and hedges on the boundary of the west and south of the site. The hedge that runs through the centre of the site would also be retained and no development would be in the root protection area. The proposed development is therefore considered to preserve and protect the landscape qualities of this site with regard to trees and hedges, in accordance with policy CS5 of the core strategy.

Ecology

6.12 Local plan policy CL8 seeks to protect rare or vulnerable species, especially those protected by law. Core strategy policy CS5 seeks to protect and enhance biodiversity, protected sites, wildlife corridors and ecological networks. These requirements are considered to be supported by the relevant paragraphs in the NPPF, including 170 on minimising impacts on and providing net gains for biodiversity, 175 which seeks to avoid, mitigate, or compensate for adverse impacts or lastly refusing harmful development, and looking for opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity. Therefore the above development policies are considered to carry full weight.

6.13 An ecological appraisal submitted with the planning application identified a number of habitats that could support protected species. These included foraging bats along hedgerows and broadleaved woodland, roosting bats in trees adjacent to the site and in adjacent woodland, nesting birds in hedges

and trees, reptiles in semi-improved grassland along some field boundaries and hedgerows, badger sett in the vicinity of the site and Great Crested Newts (GCN) in the poor semi-improved grassland margins along some of the field boundaries, hedgerows and broadleaved woodland. Further to this there are seven ponds within 500m of the site that could support GCN activity. This report also identified the additional residents from these proposed dwellings could lead to an incremental increase in recreational pressure on the region, in particular on the Stour and Orwell Estuaries Special Protection Areas/Ramsar.

6.14 The above appraisal submitted with the application identified a number of mitigation measures and enhancements measures that could be secured by condition to any consent granted. However, the NPPF is clear that the impact on protected species must be considered prior to any consent being granted for the principle of development, which is required under Circular 06/2005. The original proposed plans submitted with the application identified the removal of the hedge that traverses the site from east to west. This was identified as suitable habitat for bats, Great Crested Newts and reptiles. The original proposed scheme therefore couldn't ensure biodiversity and protected species would be protected or enhanced on site.

6.15 The indicative plans were subsequently amended to demonstrate that 73 dwellings could be provided on site whilst retaining the hedgerow feature, providing a rough grassland buffer around the north, east and south boundaries of the site, a badger exclusion zone could be adequately accommodated in the site and houses to face the Mixed Lowland Deciduous Woodland to prevent disturbance from garden waste disposal and introduction of non-native species into the woodland. Further surveys were also varied out for Great Crested Newts, amphibians, bats, badgers and a mitigation strategy and enhancement plan was submitted. This provided sufficient evidence to ensure protected and priority species would not be harmed by the development, and the appropriate mitigation and enhancement measures could be secured through condition.

6.16 The biodiversity mitigation and enhancement measures proposed additional to those noted above include four bat brick or bat boxes to provide additional roosting opportunities, a wildflower meadow and pond for reptiles and Great Crested Newts, bird boxes and bird friendly eave design and hedgehog friendly fencing, along with construction control and controlled lighting design measures. Along with long term management plans for the grassland, pond and Great Crested Newt populations on the proposed pond, the mitigation, enhancement and compensation measures are considered to provide an overall net gain for biodiversity on and adjacent to this site when compared to the existing agricultural use of the land.

6.17 The site is also within the Site of Special Scientific Interest Risk Impact Zone for the Stour and Orwell Estuaries Special Protection Area. Policy CL9 of the local plan seeks to prevent development which would harm nature conservation interest of nationally designed wildlife areas. Further to this under the Conservation of Habitats and Species Regulations 2017 requires the competent authority (the council in this instance) to have regard to the Habitats Directive in the exercise of its functions. A Habitats Regulations Assessment was therefore required to be completed for this application, to assess the impact on recreational pressures as noted above.

6.18 Further to the submission of information identifying the potential for recreational opportunities in the vicinity of the site it could be concluded that there would not be 'likely significant effects' from the proposed development. It should also be noted at the request of the highway authority a contribution is being sought to widen and resurface the footpaths and bridleway around the site. The impact on European Protected Sites was therefore concluded to be acceptable and in accordance with policy CL9 of the local plan and other requirements under the Conservation of Habitats and Species Regulations 2017.

Agricultural Land

6.19 The Best and Most Versatile (BMV) agricultural land is sought to be retained in both local plan policy CL11. This aim is further identified in paragraph 170 of the NPPF, the local plan policy is therefore given full weight. In this instance the site is comprised of Grade 3 agricultural land, rather than the higher Grade 1 or 2. There could be some loss of Grade 3a land however, but the soil has not been tested on this site to determine whether 3a or 3b, and it is not considered reasonable to do so as it falls under 20ha. Although there is the potential for the loss of grade 3a land, this would only be 3.37ha. Even when considered cumulatively with the potential loss under application 1856/17 of 14.62ha BMV, it would still not be above 20ha. It is not considered reasonable to refuse the application on this basis, but this will be noted in the planning balance.

7. Sustainability

7.1 The wider sustainability of the site has been considered. The site accessibility in terms of reducing reliance on private car use has been considered above. The construction of the development also requires consideration in terms of sustainability. The development would be required to be built to Code for Sustainable Homes (CfSH) level 6 by 2016 under policy CS3 of the core strategy. However, the Written Ministerial Statement on Housing Standards (reference HCWS488) made on 25th March 2015 is clear that requirements should not be set over CfSH level 4 due to revised Building Regulations Part L1A and Part G that came into force in 2015.

7.2 Meeting revised Building Regulations is considered to provide a good standard of construction, carbon dioxide emissions rate, energy performance of buildings and reduced water usage of 125 litre of water per person per day. Whilst the design and orientation of dwellings would be determined at a reserved matters stage along with the required compliance with Building Regulations, it is considered that the requirements of paragraph 150 of the NPPF which seeks to reduce greenhouse gas emissions could be adequately met.

8. Heritage

8.1 Members will be aware of the statutory duty upon the local planning authority to safeguard listed buildings and conservation areas from inappropriate forms of development. This statutory context flows down into development plan and national planning policies. Local plan policy HB1 seeks to protect historic buildings which includes their setting. Core strategy policy CS5 also seeks to enhance the historic environment. The NPPF identifies in paragraph 193 that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to an asset's conservation. Paragraph 194 of the NPPF identifies that "*any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification*". It is considered policies HB1 and CS5 are consistent with the NPPF and the duties laid out within the listed buildings Act and therefore afforded full weight.

8.2 When considering the impact of the proposed development on heritage assets in the vicinity of the site, there are two Grade I listed churches. St Mary's and St Peter's Church is the closest to the site on Church Lane to the north of the site. However, due to intervening land levels and existing mature landscaping the development site is not seen in conjunction with or from this heritage asset and its grounds. When standing on Church Lane however the application site can be seen in conjunction with the top of the church tower of St Peter's Church in Claydon. This however is at some distance and with intervening vegetation and other built form. Therefore there is not considered to be a harm to the setting or significance of either of these heritage assets, and the requirements of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to protect the special architectural and historic interest are met.

8.3 The site was considered by Suffolk Archaeological Service to have high potential for archaeological interest given its topographically favourable location overlooking the River Gipping, and the fact it is in an area of light, sandy soils which tended to attract early occupation. Local plan policy HB14 seeks to ensuring archaeological remains are not destroyed, which is in line with paragraph 189 of the NPPF that requires where a site has the potential to include heritage assets with archaeological interest, an appropriate desk-based assessment and where necessary field evaluation should be provided. The local plan policy is therefore given full weight.

8.4 Following on site geophysics report and metal detecting survey there is sufficient certainty that any archaeological finds can be suitably recorded and preserved off-site. A suitably worded condition is therefore recommended to ensure the requirements of policy HBE 14 of the local plan and paragraph 189 of the NPPF are met.

9. Design And Layout, Open Space and Affordable Housing

Design

9.1 Whilst this application is only at outline stage, it is important to assess whether a good standard of design can be achieved for the number of housing proposed when considering all other requirements such as appropriate wildlife buffers, tree protection areas, open space and play space provision, surface water features, road and parking layout and appropriate private amenity space for future residents.

9.2 Policy CS5 of the core strategy seeks to ensure a high quality of design is achieved that respects local distinctiveness, enhancing character and appearance of the district. Policy CS9 of this core strategy also seeks to ensure an appropriate density and mix of housing, with a minimum density of 30 dwellings per hectare. Local plan policies GP1 on design and layout of development, H13 on design and layout of housing development, policy H14 on a range of house types to meet different accommodation needs. and H15 on development to reflect local characteristics all aim to seek a good standard of design.

9.3 These development plan policies are consistent with a number of paragraphs in the NPPF. Paragraph 124 identifies good design is a key aspect of sustainable development, and high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 127 goes on to identify that developments should add to the overall quality of the area, are sympathetic to the surrounding built environment and landscape setting, establish and maintain a strong sense of place, optimise the potential of the site to accommodate development and open space to support local facilities and transport networks, create places that are safe inclusive and accessible and which promote health and well-being. Regarding the efficient use of land and appropriate densities, paragraphs 122 and 123 of the NPPF ensure an efficient use of land, whilst taking into account accessibility, character and setting of an area, that it is well designed, attractive healthy places and other policies in the NPPF are adequately considered. The development plan policies are therefore given full weight.

9.4 The illustrative layout has been amended as this application has been negotiated. The resulting scheme now is one that take account of the existing landscape features, surrounding residences and important habitats on site. With regards to design the indicative masterplan has shown it is possible to retain these above important features on site and provide a range of dwelling sizes, adequate open space, parking and private gardens.

9.5 Further consideration would be required at the reserved matters stage for the full design details to ensure the provisions of Section 17 of the Crime and Disorder Act 1998 could be met, and appropriate materials are used. The comments from Suffolk Police are noted regarding the site permeability with public footpaths. However, there is a general conflict between, on the one hand, principles of good

design, pedestrian permeability, access to public rights of way for recreation and on the other hand policing of a site. It is not considered appropriate to prevent access from the site to public footpaths on the basis of better securing the site, for the above benefits that this access brings.

9.6 With regards to the density of the site, this would be 22 dwellings per hectare. This is lower than the 30 dwellings per hectare identified in core strategy policy 9. There are site specific constraints however such as the requirement for ecological buffers and retention of the existing hedge on site. When comparing density to adjoining housing areas, it appears the development around Ely Road is around 28 dwellings per hectare, and the more recent development along Exeter Road and Hereford Drive permitted under application 0646/01 was 24 dwellings per hectare. On balance the density is considered acceptable for this site.

Open space and green infrastructure

9.7 Local plan policy RT4 seeks amenity open space and play areas within residential development. Development of 10 or more dwellings should provide open space and play space. The requirement to provide open space for the benefit of recreation and health is seen in paragraph 91 of the NPPF which seeks to ensure planning decisions achieve healthy, inclusive and safe places, including open space and accessible green infrastructure. Paragraph 96 also identifies access to a network of high quality open spaces is important for the health and well-being of communities. Finally paragraph 98 identifies planning decisions should protect and enhance public rights of way, taking opportunities to provide better facilities for users. The local plan policy is therefore considered to align to the aims of the NPPF and is given full weight.

9.8 The requirements for providing open space and play are further detailed in the Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation (2007). As this is outline consent it is not possible to specify the exact amount of open space needed, as the dwelling size mix is not yet known. The illustrative masterplan provides 3,574 sq.m. of open space in two locations. When using the standards in the above document, if the maximum number of people per dwelling were assumed (5 people) for the 73 dwellings, this would give the requirement of 730 sq.m. play space and 2,190sq.m. open space, totalling 2,920 sq.m. The development is therefore considered to provide sufficient open space and play space that can be secured through a Section 106 agreement and designed on site at the reserved matters stage.

Affordable housing

9.9 The proposed development would require 25 affordable units on the site to meet the requirements of 35% affordable housing under altered policy H4. Paragraph 64 of the NPPF seeks major development to have at least 10% affordable housing. As this local plan policy was updated in 2016 reflecting local housing need based on house prices, rents, affordability and housing needs it is considered to align with the NPPF and carry full weight.

9.10 The illustrative masterplan has demonstrated how the affordable housing would be located in at least two locations on the site, in clusters of no more than 15 dwellings to ensure affordable dwellings are integrated into the wider scheme. The final choice of materials will be important to ensure all dwellings on site are 'tenure blind' and no differentiation can be made on tenure based on appearance or materials. An appropriate affordable housing mix has been identified by the Council's Strategic Housing Officers, and would be secured through a Section 106 agreement. The requirements of policy H4 and paragraph 64 of the NPPF are therefore considered to be met.

9.11 Overall the design of the scheme is considered to have been adequately demonstrated to show that all considerations including ecology, landscape features, open space and affordable housing can be

provided on the site to a good standard of design. These will ultimately be determined through the reserved matters but the illustrative plan submitted demonstrates a good standards of design is possible within this site.

10. Impact On Residential Amenity

10.1 The site is bounded by residential dwellings along the west boundary of the site, with dwellings from Winchester Gardens, Ely Road and Hereford Drive backing onto, facing or being side-on to the site. Local plan policy H16 seeks to protecting existing residential amenity. This requirement is also identified in paragraph 127 of the NPPF which requires good design to create places with a high standard of amenity for existing and future users. The local plan policy is considered to align with the NPPF and carries full weight.

10.2 As identified in the Landscape Visual Impact Assessment, there would be Major/Moderate adverse impacts to the outlook of the dwellings along Hereford Drive and Winchester Gardens. This is a landscape harm, and is balanced as such in the conclusion to this report. The harm to residential amenity is a different material planning consideration. It is important to note under planning law there is no right to a view. There is however a right to a good standard of outlook, privacy, daylight and sunlight.

10.3 The proposed development adjacent to Hereford Drive has been set back to a good degree due to the intervening proposed ecological mitigation features. There is not considered likely to be a significant loss of amenity from outlook, privacy, daylight or sunlight to these residents.

10.4 Whilst there has been a landscape buffer provided to the rear of dwellings along Winchester Gardens, it is likely development designed at the reserved matters stage will be in the position identified in the illustrative plan. This would lead to some loss of privacy and outlook. However, given the distance from the existing dwellings to the proposed dwelling with the landscape buffer, it is not considered there would be a significant loss of privacy or outlook that would merit refusal of this scheme at outline stage. The impact on daylight and sunlight would be determined further at the reserved matters stage, but again given the distance between the existing dwellings and proposed built form it is unlikely these would have a significant adverse impact on the amenity of the existing dwellings.

10.5 The dwellings at either side of the entrance to the site, 18 and 25 Ely Road, could have development sited close to their boundaries. It is possible there would be a slight loss of privacy to the rear garden of these dwellings, and loss of daylight to the side first floor window to 18 Ely Road. These would not be sufficient reasons to refuse the scheme at this outline stage, as the illustrative layout shows these impacts could be adequately reduced by appropriate siting of dwellings effectively side on to the existing dwellings. The proposed development would therefore be in accordance with policy H16 of the local plan and paragraph 127 of the NPPF.

10.6 Residents have also raised concerns over the impact of additional residents and cars regarding noise and car lights. There is already a certain level of disturbance from the existing residences in the area causing these impacts that cannot be ignored when considering the further disturbance. But residents along Winchester Gardens and Hereford Drive do not have disturbance to the east of their properties at present. The addition of 73 dwellings in the vicinity would lead to some additional noise and disturbance from general residential activities, but given the layout and space between existing and proposed dwellings this would not give rise to such significant impacts that the scheme would lead to an unacceptable level of amenity in terms of policy H16 of the local plan and paragraph 127 of the NPPF.

Market housing

10.7 To ensure an appropriate market housing mix is secured on the site a condition is recommended to be agreed prior to approval of reserved matters to this effect. This will require the housing mix to ensure it provides a mix of house types, sizes and affordability in line with policy CS9 of the Core Strategy.

10.8 A condition is also recommended to ensure that level access is provided to ensure ease of access for wheelchair users to all buildings on site, including residential, school and community building. Whilst this is covered by Approved Document M (Part M) of Building Regulations it is considered to be a beneficial matter to design in at an early stage in the development process.

11. Surface water, foul water, contamination and minerals

11.1 The site is located on Newhaven Chalk Formation and forms a Principal Aquifer and within the Outer Zone of a Groundwater Protection Zone. It is therefore important to ensure no contaminants enter groundwater from this site, in accordance with policy SC4 of the local plan.

11.2 The site is located within Flood Zone 1, the lowest area of flood risk which is in accordance with paragraph 155 of the NPPF. Therefore there is no need to apply the sequential or exceptions test under paragraph 163 of the National Planning Policy Framework. There are however surface water flood routes along the north, west and southern boundaries of the site. To ensure the proposals are in accordance with core strategy policy CS 4 on Adapting to Climate Change and paragraph 150 of the NPPF which seeks to avoid increasing vulnerability to impacts of climate change, the development needs to demonstrate it does not increase flood risk elsewhere. Paragraph 170 of the NPPF also seeks to ensure new development does not contribute to water pollution, and as this site is in an Outer Zone of a Groundwater Protection Zone and Principal Aquifer the water quality of surface water run-off is a key issue. As the provisions of the development plan policy CS4 and the NPPF align, this policy is considered to carry full weight.

11.3 Groundwater levels had been tested on the site and are not likely to be considered to cause flooding. Although groundwater levels may be shallow at the lower sections of the site (to the western and southern area of site), the sloping land would enable the water to exit the site and not lead to on-site flooding.

11.4 Infiltration testing has indicated that infiltration is likely to be a suitable method to dispose of surface water from any hard standing on the site, meeting the requirement of infiltration-first as a Sustainable Urban Drainage Strategy (SuDS) in line with paragraph 165 of the NPPF. Whilst there would be some on-plot infiltration (i.e. garden soakaways, permeable paving), surface water from impermeable surfaces would drain to a central infiltration facility on site (five tanks under central open space). Should further investigations reveal that this is not feasible then disposal would be via an outfall to the Anglian Water surface water sewer network.

11.5 Sufficient storage has been designed on site to accommodate the 1:100 year storm event plus a 40% allowance for climate change. Exceedance flows would be managed via overland flow routes along road networks and within the open space provided on site. Measures to treat surface water before it reaches the infiltration facility would be put in place, particularly from roads and driveways which would most likely contain hydrocarbons. Surface water features would be managed by a management company and some elements potentially adopted by Anglian Water.

11.6 The Lead Local Flood Authority (LLFA) have no objections to the proposed surface water drainage strategy subject to appropriate conditions to require infiltration drainage first and a two-stage treatment process for surface water, both of which would be specified in any conditions.

11.7 Anglian Water have indicated they have capacity for wastewater treatment and in the foul sewerage network for this development, subject to a condition for a drainage strategy on this site. Whilst Anglian Water have noted the surface water strategy is unacceptable, this is due to the application being in outline, with a detailed strategy being unavailable until the detailed layout is submitted under reserved matters. The LLFA have no objection and the applicants have included the Pre-Planning Assessment by Anglian Water that indicates the surface water flows from their site would be acceptable to Anglian Water (FRA Appendix B). An outline surface water strategy and management plan have been submitted and Anglian Water recommend a planning condition to ensure that a detailed strategy is provided prior to any drainage works commencing.

11.8 The current use of the land is agricultural. The likelihood of contamination being found on the land is low, but a condition has been recommended in the event of any unidentified contamination found on the site in accordance with paragraph 178 of the NPPF.

11.9 The potential for the additional traffic to have an adverse impact on the surrounding air quality has been considered, but due to the scale of the development it is unlikely to result in a deterioration of good air quality in area, meeting the requirements of paragraph 180 of the NPPF.

11.10 The proposed development would therefore meet the requirements of the policy CS4 and the NPPF to protect groundwater and ensure the development does not increase flood risk elsewhere.

11.11 The site lies within the mineral consultation area under Suffolk County Council's Minerals Core Strategy 2008. Policy 5 of this document requires that any proposed development on unallocated sites over one hectare will be safeguarded from development unless it can be shown that sand and gravel present are no of economic value or that mineral will be worked prior to development taking place. This is considered to align with paragraphs 203 and 204 of the NPPF, and so can be given full weight.

11.12 In this instance the Mineral Planning Authority have no objections, as the site is not suitable for extraction due to its close proximity to existing dwellings. A condition has been requested to ensure any mineral extracted from site during construction process is quantified.

12. Planning Obligations / CIL

12.1 A number of contributions are proposed to be secured to meet the infrastructure requirements of the proposed development, as required by altered policy H4 (affordable housing), and policies T4 (highways) and RT4 (recreational space) of the local plan and core strategy policy CS6. These policies to secure infrastructure are considered to be in line with paragraph 34 and 94 (relating to schools) of the NPPF, and therefore given full weight.

12.2 A Section 106 agreement will secure the following contributions:

- Secure no fewer than 25 affordable dwellings
- Provision of open space and play space
- £8,897.97 for Recreational Access Disturbance Mitigation Strategy (for Stour and Orwell Estuary Special Protection Areas - £121.89 per dwelling)
- £348,636 for primary school building costs (£20,508 per school place)
- £20,009 for primary school land purchase (£1,177 per school place)
- £58,125 Public Rights of Way improvements to Barham Bridleway 009 and Claydon Footpaths FP13 and FP14
- Improvements to Church Lane Claydon/Norwich Road junction and Station Road/Norwich Road junction; Financial contribution toward transport improvements in the village to encourage walking and cycling, safer routes to school and improve safety for pedestrians and cyclists; and Norwich Road extension of Speed Limit on Norwich Road. The total cost of these works are estimated at

£98,250 to be apportioned between this and Norwich Road application (reference 1856/17). This site has been identified to contribute £15,542.50, with the remainder to be sought from 1856/17.

12.3 The development would be liable for CIL contributions, which would be sought for public transport improvements (real time bus passenger information sign at a cost of £13,000 for installation), library services, waste disposal improvements, provision of secondary school and sixth form places for this particular development and healthcare provision. Liability would be calculated at the reserved matters stage, and collected on commencement of development.

12.4 Provided these S106 contributions are secured there is no objection from the Local Education Authority regarding school capacity, the Local Highway Authority regarding impact on Public Rights of Way, or in relation to ecological impact on protected sites, affordable housing provision and open space provision.

13. Delivery

13.1 The NPPF makes clear in paragraph 59 that it is the Government's intention to significantly boost the supply of housing and in support of that objective it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Paragraph 76 of the NPPF also identifies to help ensure proposals for housing developments are implemented in a timely manner, a shorter time limit can be considered, provided it does not affect its deliverability or viability.

13.2 The deliverability of a development is an important factor in an assessment as to its sustainability (in terms of its benefits) and in terms of its contribution to the supply of housing in the District; considered to be more compelling in the event that there is a demonstrable shortfall in housing supply.

13.3 The NPPF defines deliverable:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."

and:

"Sites with outline planning permission... should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

13.4 The PPG gives further guidance on those considerations under the chapter heading, '*Housing and economic land availability assessment*' and including three, important concepts: *suitability*, *availability*, and *achievability*. Whilst primarily aimed at aiding the plan-making process, the principles are no less useful when considering the deliverability of this development. The PPG also identifies information relating to site viability, ownership constraints or infrastructure provision, and a statement of common ground between the local planning authority and the developer confirming the anticipated build-out rates.

13.5 To detail the delivery of this site further a Delivery Statement has been submitted in support of this application.

13.6 This statement identifies Scott Properties (the applicant) are a strategic land promoter who have a development arm and develop some sites themselves. The statement goes on to detail how the illustrative masterplan has been developed over the course of this application to address all objections insofar as possible with supporting technical information, which would assist in the delivery of dwellings on site as the work has effectively been 'front-loaded'.

13.7 Examples are given of other projects the company has sought outline consent on of similar scales demonstrating between 127 to 166 days from granting outline consent to submission of reserved matters.

13.8 The applicant notes the potential delay in any development site would be agreement of the Section 106 agreement. Accordingly, a S106 agreement has been agreed by all parties ready for engrossment. This would not delay the next stage of delivery, subject to a positive resolution on the provisions in the S106 and the scheme from committee.

13.9 The applicants had given a proposed timescale for sale of the site post-permission, a potential start on site in late 2020, but subsequent delays due to the ongoing Covid pandemic have significantly delayed this application being determined by the council. As such, and given the ongoing circumstances of the pandemic, the applicants have advised that it is no longer realistic for the shortened timescales to be assured, and it is considered important that any time limit recommended is realistic to ensure any consent issued is ultimately deliverable. The use of a standard time limit has been agreed with the applicant and would still be likely to lead to delivery of the site within 5 years of any consent being issued.

13.10 Notwithstanding the above comments, the statements and assumptions made in the Delivery Statement are considered to be fair and reasonable by officers. The only weaknesses of this delivery statement is that there is no certainty over the eventual developer, and there is no evidence from them as to when they would programme commencement and completions on this site within their build programme.

13.11 However, the site is considered to be suitable for development, as detailed further in the conclusion and planning balance to this report, providing significant benefits of housing, affordable housing and the benefit of biodiversity net gain. The site is available as there are no known legal or ownership issues relating to this site. The developer also has a delivery record as demonstrated in the Delivery Statement. The development is also considered achievable as there are no known viability issues when taking account of the Section 106 provisions and required Community Infrastructure Levy payments.

13.12 The site and development proposed is therefore considered to be suitable, available, and achievable, with officers not considering that there are any constraints that would unduly inhibit delivery.

13.13 The evidence presented in the Delivery Statement is considered to demonstrate that the site is deliverable in line with the considerations of the NPPF and PPG, and therefore substantial weight is given to the consideration of housing delivery in this instance, where: the development would of itself make a significant contribution by way of housing delivery and there is support for an assertion that the development is deliverable; and, further, where there is a confidence and reasoned expectation that the development would make a valuable contribution to the five-year land supply period in the short-term and at an expeditious rate.

13.14 The consideration of delivery and weight will be balanced in the conclusion to this report.

14. Other matters

14.1 Section 143 of the Localism Act 2011 on local financial considerations requires consideration to be given to the financial benefits a development would bring to the council through grant income, such as New Homes Bonus, Community Infrastructure Levy, Council Tax and Business Rates. Whilst such considerations are positive they should be afforded little weight; the PPG is clear that it is not appropriate to make a decision based on the potential for the development to raise money for a local authority or

other government body. Officers do not consider that such benefits are determinative in reaching the recommendation at the end of this report.

14.2 Fire hydrants would be conditioned to any approval issued.

14.3 It is noted that Suffolk County Council originally requested some housing on site is housing with care for older people. A mix of housing is proposed on the application site with an indicative housing mix indicating the inclusion of 8 bungalows. Whilst no dwellings are specifically provided for older people these bungalows may provide homes suitable for older people. In the absence of a clear policy requirement for housing for older people in the development plan it is not possible to insist it is provided.

14.4 Superfast Broadband connections are also requested by the County and provision supported by paragraph 112 of the NPPF. This is a service provided by a private company and so cannot in itself be secured through planning consent. A condition can be applied to ensure there is sufficient space for the required cabling to each dwelling within the development and is recommended as such.

14.5 The Joint Local Plan Pre-submission Regulation 19 document was published in November 2020. In this document this site was identified to be allocated for approximately 75 dwellings under allocation LA003. The requirements of this allocation identified that any development on this should comply with:

I. The relevant policies set out in the Plan;

II. Development is designed to conserve and where appropriate enhance the Church of St Mary (Grade I), Garden Wall and gateway (Grade II), Shrubland Hall (Grade II) and Registered Park and Garden (Grade I) and their settings. Development should be set back from the northern edge of the site;*

III. Important hedgerows should be retained and historic footpaths should be incorporated into the development;

IV. Trees covered by Tree Preservation Orders are retained;

V. Rights of Way within the site and within the vicinity of the site should be retained and enhanced;

VI. An archaeological assessment and measures for managing impacts on archaeological remains are provided;

VII. Flood risk assessments should be used to avoid and mitigate all forms of flooding in a sustainable manner;

VIII. An ecological survey is provided, and any necessary mitigation measures;

IX. Site layout should be designed to take into account existing water mains in Anglian Water's ownership within the boundary of the site;

X. Contributions, to the satisfaction of the LPA, towards the provision of the new preschool and primary school, and secondary school provision;

XI. Contributions, to the satisfaction of the LPA, towards healthcare provision; and

XII. Contributions, to the satisfaction of the LPA, towards additional Household Waste Recycling provision.

14.7 The Joint Local Plan (JLP) is progressing through the plan-making process. At present limited weight can be given to this proposed allocation in terms of deciding a planning application. However, the JLP is the Council's intended development strategy to be submitted for examination. The emerging allocation does nonetheless, give an indication of the direction of travel as to how the authority will meet its overall housing needs over the next plan period and the specific requirements and obligations associated with the allocation.

14.8 To arrive at the suggested allocations in this Regulation 19 JLP document, a comprehensive review has been undertaken of all the sites put forward to formulate the draft joint local plan. That assessment has considered the sustainability of the sites overall to determine which provide a more deliverable and sustainable form of development for growth in the district as a whole. This site has been identified by the

Council as a preferred location for development on this basis. Whilst Members must have caution in placing significant weight on this emerging allocation, it does indicate how the Council will expect to meet its housing needs in the most sustainable way considering the District as a whole.

PART FOUR – CONCLUSION

14. Planning Balance and Conclusion

14.1 Since Members last considered this application there has been submission of further information and material considerations have substantially evolved. The applicant has sought to mitigate a number of the harms, addressing objections relating to ecology, landscape and design in particular with revisions to the indicative layout to the site. Further work has also been undertaken relating to the cumulative highway impact of this site and the proposed development site on Norwich Road in Barham.

14.2 The starting point for any planning decision is the development plan, as identified in Section 38(6) of the Planning and Compulsory Purchase Act 2004. Determination of any application must be made in accordance with the plan unless material considerations indicate otherwise. A key material consideration regarding the principle of development is the National Planning Policy Framework (NPPF) 2019.

14.3 The principle of development on this site is not supported by local plan policy H7, CS1 and CS2 of the Core Strategy and FC2 of the Core Strategy Focused Review. These however are considered to be out-of-date and not be consistent with the aims of the NPPF and therefore accorded less weight. Policy FC1 of the Core Strategy Focused Review repeats the requirements of the former paragraph 14 of the NPPF, which is replaced now with paragraph 11 which is the more relevant consideration and so this policy is afforded less weight. Policy FC1.1 seeking to conserve and enhance the local character of different parts of the district, is up-to-date and relevant to this application. These two policies seek to promote the principles of sustainable development. This conflict with the development plan is noted but is not necessarily fatal when considering other material considerations. Whilst it is noted this site has been identified for development of 75 dwellings across a larger site than just this application site in the emerging Joint Local Plan, this is at an early stage and so limited weight can be given to this at present.

14.4 Whilst the council can currently demonstrate a sufficient land supply, the above policies being out-of-date require the application to be considered in terms of paragraph 11dii) of the NPPF. This directs that development should be approved unless the adverse impacts of doing so outweigh the benefits.

14.5 Development of this site would provide the significant benefit of delivery of up to 73 dwellings, 25 (or 35%) of which would be affordable. The delivery of these dwellings has also been explored, and weight is placed on the benefit of these dwellings being highly likely to be delivered within the next five years, contributing to the Council's five year supply of deliverable sites.

14.6 The site would have some short-term economic benefits from construction jobs during the build-out of the site, and there would be some economic benefits for local services such as shops and public transport from additional spend from the new residents to the area. These benefits would have moderate weight.

14.7 There would be important environmental benefits and a net gain for biodiversity secured through the Mitigation Strategy and Enhancement Plan and the Landscape and Ecological Management Plan, both of which are supported by the Council's advisors. As this is a requirement of the NPPF however only moderate weight can be given to the scheme demonstrating this. The site is located in a fairly sustainable location, reducing the need to travel and facilitating the promotion of sustainable transport. The benefits

associated with securing money for a new primary school and CIL are considered to be moderate as these are required to make the scheme mitigate its impacts on infrastructure. There would also be benefits associated with the widening and resurfacing of the footpaths and bridleway around and within the site, but these must be balanced against the key harm of the Major/Moderate adverse impacts to residents of Winchester Gardens and Hereford Drive, and users of the bridleway 009 that runs along the north of the site.

14.8 The Major/Moderate harms identified create conflict with policy CS5 of the core strategy and paragraph 170 of the NPPF, both of which seek to protect and enhance the landscape quality of the site. But as identified earlier in the report the extent of where this landscape impact occurs is limited to a section of the wider Bridleway 009 and for some residents of Claydon. The impact whilst still Major/Moderate it does not impact on a wider landscape, but to a more local level within the site and when viewing the site from immediately neighbouring residential dwellings and the Council's Landscape Architect supports the scheme.

14.9 Whilst it is noted that there would be delays to the road network with this and other proposed developments in the surrounding area, this delay would not be severe. Whilst it is identified that the development would lead to delays at two key junctions in Claydon, the highway impact would not be severe, and the delays would only occur for a relatively short period of time of 15 minutes at AM and PM rush hour peak times, to which this development would contribute very marginally to. The Local Highway Authority has supported the proposals at each stage. Therefore the proposed development would be in accordance with the requirements of the NPPF and there would not be a conflict of policy. The applicants have also gone further to provide additional pedestrian and cycle improvements within the village of Claydon responding to Members concerns.

14.10 The proposed development does conflict with a number of policies in the development plan. However, as the key policy conflict of the principle of development of this site relate to policies that are out-of-date, this policy conflict with H7, CS1, CS2 and FC2 are given less weight. The policy conflict regarding landscape protection is given less weight given the limited extent to this within the landscape.

14.11 When considering the wider planning balance, this scheme would lead to 73 deliverable dwellings of which 25 are affordable in a sustainable location. These three matters are given significant weight in the planning balance. The site is identified as an emerging site allocation for approximately 75 dwellings, and whilst this has limited weight in planning terms this does give an indication of the direction of travel as to where housing could be most sustainably located to meet the authority's housing need.

14.12 Paragraph 11 of the NPPF directs decision-making to approve development unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In this instance the adverse impact as noted above would not significantly and demonstrably outweigh the benefits. Overall it is recommended that the benefits of this deliverable housing in the sustainable location outweighs the above identified landscape harm that would result from this scheme and potential loss of Grade 3a agricultural land, and this scheme is considered to represent a sustainable development. The illustrative masterplan provides enough certainty at this outline stage that all other considerations could be adequately met at the reserved matters stage, or through the Section 106 agreement, planning condition or Community Infrastructure Levy requirements.

RECOMMENDATION

That the application is GRANTED planning permission and includes the following conditions:-

(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:

- Affordable housing
 - This shall include not less than 35% of the total dwellings
 - 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.
- Primary school building costs - £20,508 per school place (total £348,636)
- Primary school land purchase - £1,177 per school place (total £20,009)
- Recreational Access Disturbance Mitigation Strategy (RAMS) contribution - £121.89 per dwelling (total £8,897.97)
- Improvements to Church Lane Claydon/Norwich Road junction and Station Road/Norwich Road junction; Financial contribution toward transport improvements in the village to encourage walking and cycling, safer routes to school and improve safety for pedestrians and cyclists; and Norwich Road extension of Speed Limit on Norwich Road. The total cost of these works are estimated at £98,250 to be apportioned between this and Norwich Road application (reference 1856/17). This site has been identified to contribute £15,542.50, with the remainder to be sought from 1856/17.
- Public Right of Way improvement – widening and resurfacing of footpaths FP13 and FP14 and Bridleway 009 - £58,125

(2) That the Chief Planning Officer be authorised to APPROVE 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 outline time limit
- Approval of reserved matters – appearance, scale, layout, landscaping
- Approved Plans (Plans submitted that form this application)
- Phasing Condition (To allow phasing of the development and allows spreading of payments under CIL) (Pre-commencement)
- Market housing mix prior to or concurrent with reserved matters to be agreed
- Provision of open space and play space, timing of and maintenance and management
- Detailed landscape planting plan, including advance planting, management plan, landscaping scheme and details of SUDS areas
- Road construction and surface water disposal from roads
- Construction management plan (including hours for deliveries and construction works on site)
- Vehicle turning and parking (including cycles and electric vehicle charging points)
- Bin storage
- Travel plan

- Protection of public right of way during construction the development
- Fire hydrants
- Drainage strategy (Anglian Water)
- Surface water drainage scheme including further infiltration testing and two-stage water treatment
- Maintenance and management of the surface water drainage scheme
- SuDS components on LLFA's Flood Risk Asset Register.
- Construction Surface Water Management Plan
- Mineral extraction quantified
- Archaeology – implementing programme of archaeological work
- Ecology protection, mitigation and enhancement, including the provision of Swift boxes, hedgehog fencing and wildlife sensitive lighting
- Level access to enable wheelchair access for all dwellings/buildings
- Tree Method Statement and Tree Protection Plan compliance
- Unexpected contamination
- Energy and renewal integration scheme to be agreed
- Rainwater harvesting to be agreed
- Service ducting for Broadband cables
- On site open space and includes management of the space to be agreed and requirement for public access at all times.

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

- Pro active working statement
- SCC Highways notes
- Works to a watercourse may require consent (Land Drainage Act 1991)
- Any discharge to a watercourse or groundwater comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to watercourse that drains into Internal Drainage Board catchment may be is subject to payment of a surface water developer contribution
- European Protected Species Licence

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

Tabled Papers

DC/18/00861 – Land to east of Ely Road, Claydon

Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Amendment to committee report

Paragraph 14.10 is amended to include the following underlined text to clarify on the officer's conclusion on this application:

14.10 The proposed development does conflict with a number of policies in the development plan. However, as the key policy conflict of the principle of development of this site relate to policies that are out-of-date, this policy conflict with H7, CS1, CS2 and FC2 are given less weight. The policy conflict regarding landscape protection is given less weight given the limited extent to this within the landscape. The development is considered to comply with the development plan as a whole, notwithstanding the minor conflicts with some policies identified in the report.

Further consultee response

Natural England confirmed no objection to Habitats Regulations Assessment carried out by the council for the proposed development, subject to S106 securing Recreational Access Mitigation Strategy.

Consultee Comments for Planning Application DC/18/00861

Application Summary

Application Number: DC/18/00861

Address: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 67 dwellings, public open space and supporting site infrastructure including access.

Case Officer: Jo Hobbs

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 Council remain very concerned regarding the amount of cumulative traffic this proposal will contribute to on Ely Road, on Thornhill Road and into the village of Claydon. The access is insufficient for the properties planned. Ely Road currently has cars parked on both sides of the road, mounting the pavement and this will become the main access point for 67 more houses, making this route even more dangerous and inaccessible for pedestrians and road users alike. The planned layout does not appear to allow sufficient room for larger vehicles such as fire engines and dust carts to access the estate safely without needing to reverse on shared car and pedestrian areas, putting pedestrians at risk. The effect of the traffic on the estate roads, which are already beyond capacity will be negative on current and future residents.

The CCG will not be responding to this planning application as responses have previously been sent and these are still pertinent to the current position. Should the planning application change at all then the CCG might require updating the previous response or if the health strategy is changing then this might also require further comments to be made.

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

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 03 March 2021 09:47
To: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>
Subject: Consultation Response: Planning Application DC/18/00861

Dear Sir/Madam

Our ref: 344390
Your ref: DC/18/00861

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 22 January 2021.

The advice provided in our previous response applies equally to this **amendment** although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

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 faithfully

Ed McIntyre
Natural England
Consultation Service
Hornbeam House
Crewe Business Park, Electra Way
Crewe, Cheshire, CW1 6GJ

Tel: 02087 00735
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

During the current coronavirus situation, Natural England staff are primarily working remotely to provide our services and support our customers and stakeholders.

Please continue to send any documents by email or contact us by phone to let us know how we can help you. See the latest news on the coronavirus at

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: Jo Hobbs

Dear Jo

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/18/00861

PROPOSAL: Outline Planning Application (with means of access to be considered) - Erection of up to 67 dwellings, public open space and supporting site infrastructure including access.

LOCATION: Land To The East Of, Ely Road, Claydon, Suffolk

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

We have reviewed the data supplied with this application, the summary of our findings are as follows:

- Ely Road carriageway is 5.5m wide with 1.8m wide footways on both sides with direct access to dwellings and parking spaces which is the design for Minor Access Road as shown in Suffolk Design Guide (SDG). This type of road normally serves approximately 100 dwellings. Ely Road is approximately 140m long with 2 visitor parking bays, with 25 dwellings (only 11 dwellings with frontage along the road) and Winchester Gardens which has 19 dwellings. Therefore, with the proposal of 67 additional dwellings, Ely Road will serve 111 dwellings in total which is acceptable as shown in SDG.
- The proposal for 67 dwellings would create approximately 30 vehicle movements within the morning peak hour (1 vehicle every 2 minutes).
- The bus stops on Thornhill Road (200m from the site) has Bus Routes 113 and 114 with a service approx every 2 hours to Ipswich and Eye. To catch the more frequent service Route 88, the closest bus stop is approximately 1km from the site, approximately a 12 minute walk.
- As the previous response to this application, the catchment primary school is approximately 650m from the site which is comfortably within walking distance for pupils to walk to school. The proposed mitigation measures for footway improvements between the site and the primary school will create a safer route for the vulnerable user.
- the proposed mitigation measures to be funded by this and The Norwich Road Barham application will provide footway improvements in the Village.
- The site has Public Rights of Way footpaths adjacent it's boundary. Linking the site to public rights of way will provide a healthy, safe and sustainable way to access the countryside and other local services.

Taking all the above into account, it is our opinion that this development achieve would provide safe and suitable access to the site for all users (NPPF Para 108). and would not have a severe impact on the road network (NPPF para 109) therefore we do not recommend a refusal for the proposal.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Your ref: DC/18/00861
 Our ref: 52360
 Date: 01 March 2021
 Enquiries to: Peter Freer
 Tel: 01473 264801
 Email: peter.freer@suffolk.gov.uk

By e-mail only:
planning@babberghmidsuffolk.gov.uk

FAO Jo Hobbs

Dear Jo,

Re: Claydon: land to the east of Ely Road – developer contributions

Suffolk County Council has previously provided a substantive consultation response by way of letter on 06 August 2020. I refer to the planning application: Outline Planning Application (with means of access to be considered) - Erection of up to 67 dwellings, public open space and supporting site infrastructure including access.

As the number of dwellings has reduced from 73 dwellings to 67 dwellings, I provide below an updated summary of infrastructure requirements:

CIL	Education	Total	Per dwelling contribution
	- Secondary school expansion	£261,525	
	- Sixth form expansion	£47,550	
CIL	Libraries improvements & resources	£14,472	
CIL	Waste disposal improvements	£8,308	
S106	Education		
	- Primary school new build	£307,620	£4,591.34
	- Primary school land cost	£17,655	£263.51
S106	- Highways improvements	£15,542	
S106	- Public rights of way	£58,125	

Infrastructure requirements set out in the [Developers guide to infrastructure contributions in Suffolk](#).

1 x 1 bed bungalow excluded from the pupil yield calculations. Included 4 x 1 bed flats, 4 x 2 bed flats and 58 Houses (including bungalows).

- Primary school new build cost is 15 pupils x £20,508 = £307,620 (S106)
- Primary school land cost is 15 pupils x £1,177 = £17,655 (S106)
- Secondary is 11 pupils x £23,775 = £261,525 (CIL)
- Sixth form is 2 pupils x £23,775 = £47,550 (CIL)

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.

Time Limit. The above information is time-limited for 6 months only from the date of this letter.

Monitoring fee. In accordance with the CIL regulations, the county council charges **£412** for each trigger point in a planning obligation, payable upon completion of the s106 agreement.

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.

Yours sincerely,

PJ Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Growth, Highways & Infrastructure Directorate

cc BMSDC, CIL Infrastructure Team

2021-02-23 JS Reply Land To The East Of, Ely Road, Claydon, Suffolk Ref DC/18/00861

Dear Jo Hobbs,

Subject: Land To The East Of, Ely Road, Claydon, Suffolk

Please see consultation reply dated 8th March 2018.

Kind Regards

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

Your Ref: DC/18/00861
Our Ref: SCC/CON/0926/21
Date: 4 March 2021
Enquiries to: Ross.Walker@suffolk.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: Jo Hobbs

Dear Jo Hobbs,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN:**

PROPOSAL: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

LOCATION: Land To The East Of, Ely Road, Claydon, Suffolk

Notice is hereby given that the County Council as Minerals and Waste Authority make the following comments:

I refer you to our comments provided by Graham Gunby on 07 February 2019. We have nothing further to add.

Yours sincerely,

Ross Walker
Planning Officer
Planning Section
Strategic Development - Growth, Highways & Infrastructure

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

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

Sent: 22 February 2021 14:40

To: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

Subject: FW: MSDC Planning Re-consultation Request - DC/18/00861

Fire Ref.: F216223

Good Afternoon,

Thank you for your letter informing us of the re-consultation for this planning application.

The Suffolk Fire & Rescue Service made comment originally, which we note was published. The comment may Remain in Place for the re-consultation. We will require a condition in the decision notice for the installation of fire hydrants.

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



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

04/03/2021

For the attention of: Jo Hobbs

Ref: DC/18/00861 - Land To The East Of Ely Road Claydon Suffolk

Thank you for re-consulting us on the outline application for the erection of up to 73 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works (with some matters reserved).

Sine we were last consulted the revised development scheme has been reduced from 73 dwellings to 67 dwellings, with alterations to the positioning of some of the dwellings and their associated garages. We have no comments on these alterations, however we would recommend the following reserved matters conditions are still considered:

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING

Before any works commence on site, details of any advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other construction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

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 for a minimum of 5 years. Both new and existing planting will be required to be included in the plan.

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING 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 should 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 should be accompanied by a schedule, with details of quantity, species and size/type (bare root, container etc). Hard landscape details such as surface materials and boundary

treatments must also be included.

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS

Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

If you have any queries regarding the above matters, please do not hesitate to contact me.

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.

From: Paul Harrison
Sent: 05 March 2021 16:55
To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>
Subject: DC 18 00861 Barham (Claydon) amended plans

Heritage consultation response

Jo

I do not wish to offer comment on behalf of Heritage team on the amended proposal.

Paul

Paul Harrison
Heritage and Design Officer
Babergh and Mid Suffolk District Councils
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

For our latest Coronavirus response please visit our website via the following link:
<https://www.midsuffolk.gov.uk/features/our-covid-19-response/>

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

Sent: 09 March 2021 10:09

To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>

Subject: DC/18/00861. Air Quality

Dear Jo

EP Reference: 289628

DC/18/00861. Air Quality

Land To The East Of, Ely Road, Claydon, IPSWICH, Suffolk.

Re-consultation: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Many thanks for your request for comments in relation to the above appliciaton. I can confirm that I have no comments to make in addition to those made earlier in the consultation period.

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

From: Peter Chisnall <Peter.Chisnall@babberghmidsuffolk.gov.uk>
Sent: 08 March 2021 10:40
To: BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>
Subject: DC/18/00861

Dear Jo,

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/18/00861

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Location: Land To The East Of, Ely Road, Claydon, Suffolk

Reason(s) for re-consultation: Please see revised plans and supporting information

Many thanks for your request to comment on the Sustainability/Climate Change aspects of this re-consultation.

I have studied the documents and take note of my predecessor's responses dated 21st March 2018 and 18th February 2019. It should be noted that I can find no mention of the important issue of Climate Change anywhere within those documents.

Whilst this is for Outline Planning Permission the importance of mitigation from and adaptation to future Climate Change means some consideration of this topic area is expected.

Since the date of my predecessor's last response Babergh and Mid Suffolk Councils declared a Climate Emergency. They 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 recommend refusal to this application. If the planning department decided to give permission and 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).

With all future Sustainability and Energy Strategy the Council is requiring the applicant to indicate the retrofit measures required 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 applicant may wish to do this to inform future owners of the properties.

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.

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/>

The UK Govt indicated in January the steps that will be taken to have interim Part L Buildings Regulations with improved Fabric Efficiency requirements in place by 2022 as a precursor to even higher requirements in the Future Homes Standard in 2025. Future developments will be expected to take this into account.

Regards,

Peter

Peter Chisnall, CEnv, MIEMA, CEnvH, MCIEH
Environmental Management Officer
Babergh and Mid Suffolk District Council - Working Together

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

Sent: 09 March 2021 10:23

To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>

Subject: DC/18/00861. Land Contamination

Dear Jo

EP Reference: 289626

DC/18/00861. Land Contamination

Land To The East Of, Ely Road, Claydon, IPSWICH, Suffolk.

Re-consultation: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Many thanks for your request for comments in relation to the above appliciaton. I can confirm that I have no comments to make in addition to those made earlier in the consultation period.

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

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MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Jo Hobbs – Planning

From: Sacha Tiller – Strategic Housing

Date: 10.03.21

Proposal: Outline Planning Application (with means of access to be considered) – Erection of up to 67 dwellings, public open space and supporting site infrastructure including access. (Application was amended from 73 to 67 dwellings).

Location: Land To The East Of, Ely Road, Claydon, Suffolk – DC-18-00861

Key Points

1. Background Information

A development proposal for 67 dwellings.

The policy position would be for 35% affordable housing on any site of 10 or more units or site area in excess of 0.5 hectares.

An application has been made for 67 dwellings.

Therefore in order for this application to be policy compliant it would need to provide 23.45% affordable housing dwellings for affordable rent and shared ownership – however on this occasion we have agreed to 23 affordable housing units.

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. **Ref1 SHMA 2019, p.122 – Summary section.**

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 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.

3. Preferred Mix for Open Market homes.

3.1 There is strong need for homes more suited to the over 55 age brackets within the district and the supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. Mid Suffolk and the county as a whole faces a large increase in the population of over 65-year olds so we need to ensure there are suitable housing choices for older people to remain in their communities.

3.2 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities.

3.3 Broadband and satellite facilities as part of the design for all tenures should be standard to support.

3.4 All new properties need to have high levels of energy efficiency.

3.5 The open market mix has been submitted at Outline stage as:

4. Required mix for Affordable Houses = 23

Number	Type	Tenure
4	1 bedroomed 2-person flats @ 50 sqm	Affordable rented
4	2 bedroomed 4-person flats @ 70 sqm	Affordable rented
7 Amended to 6 10/03/2021 - ST	2 bedroomed 4-person House @ 79 sqm	Affordable rented
2	3 bedroomed 5-person house @ 93 sqm	Affordable rented
5	2 bedroomed 4-person House @ 79 sqm	Shared Ownership
2	3 bedroomed 5-Person House @ 93 sqm	Shared Ownership

***The size, type, tenure, sqm of the above was discussed and agreed to be included in the final S106 for this site.**

5. Other requirements for affordable homes:

- Properties must be built to current Homes England National Housing Standards March 2015.
- The council is granted 100% nomination rights to all the affordable units on first lets and 100% on subsequent lets.
- Any Shared Ownership properties must have an initial share limit of 70%.

- The Council will not support a bid for Homes England grant funding on the affordable homes delivered as part of an open market development. Therefore, the affordable units on that part of the site must be delivered grant free.
- The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice.
- (a) not Occupy or permit Occupation of more than fifty per cent (50%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until fifty per cent (50%) of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider; and
- (b) not Occupy or permit Occupation of more than eighty per cent (80%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until all of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider
- On larger sites, the affordable housing should not be placed in groups of more than 8 units
- Adequate parking provision is made for the affordable housing units and cycle storage and bin stores.
- It is preferred that the affordable units are transferred to one of the Council's partner Registered Providers – please see www.baberghmidsuffolk.gov.uk under Housing and Affordable Housing for full details or email: strategic.housing@babberghmidsuffolk.gov.uk
- Adequate parking and bathroom provision needs to be made for all the ground floor and bungalow affordable housing units. The parking for bungalows and ground floor flats need to pertain particular attention to current policy of Part M4(2) with regard to access, location, size of car parking, bin storage and accessibility to any communal areas or facilities.

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

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

Sent: 01 March 2021 12:25

To: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Re-consultation Request - DC/18/00861

Public Realm Officers do not wish to add any comments at this stage with regards to the re-consultation. It is noted that in granting outline planning permission it was reported that the illustrative masterplan provides 3,574 sq.m. of open space in two locations and the development is considered to provide sufficient open space and play space that can be secured through a Section 106 agreement and designed on site at the reserved matters stage.

Regards

Dave Hughes

Public Realm Officer

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Consultee Comments for Planning Application DC/18/00861

Application Summary

Application Number: DC/18/00861

Address: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Case Officer: Gemma Pannell

Consultee Details

Name: Mrs Suzanne Eagle

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

Email: claywhit@btinternet.com

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

The parish council objects to this application for the following reasons:-

1. Ely Road will be the only entrance to the development of 74 dwellings and it does get restricted by cars.

We are also very concerned regarding the siting of the traffic calming measures and would like to see these within the new development not on the current road. Actually we don't understand why these are required.

2. If the application for 300 dwellings at the bottom of Barham Church Lane goes ahead this, together with Ely Road for 74 dwellings, plus other small developments in Barham, traffic movements through Claydon village will increase dramatically. At present there are approximately 1600 properties in Claydon and Barham so all these developments represent a 30% increase. It is impossible to add infrastructure as the vast majority of traffic goes through filter roads on the estate down to the main road through the village and out to the A14 Junction 52 or off main village road to Great Blakenham.

3. We are very concerned that there will be three storey properties on this development which is out of character for the area, especially so close to properties on Ely Road.

4. There are environmental concerns but this will be covered more fully in other reports.

However, other than the items raised above, the parish council feels if development is required in Claydon and Barham this is the preferred option.

Consultee Comments for Planning Application DC/18/00861

Application Summary

Application Number: DC/18/00861

Address: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Case Officer: Jo Hobbs

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 remain opposed to this development and strongly object for the reasons previously stated.

Ely Road and Thornhill Road (the only access to the development) are already extremely congested road. The attached photograph shows Thornhill Road at 11.39 on the 20.2.2019, demonstrating the lack of access due to parked vehicles. Buses are struggling to navigate their way through the estate as it is and with extra cars using this route, it will exacerbate the existing problem.

In conjunction with other developments proposed in Claydon and Barham, the cumulative effect on the villages will strip away the village identity and increase the amount of traffic dramatically.

This proposed development is an over-development of the plot of land. The recent plan has more properties packed together and it does not retain the village feel of the rest of the Claydon garden village. The new plan also mentions lots of 'private roads', and the Parish Council object to so many non-adopted roads.

There are concerns regarding water pressure, especially the cumulative effect if other planned developments are approved. There is currently insufficient water pressure for the houses already using the water and further development would impact water pressure adversely.

Consultee Comments for Planning Application DC/18/00861

Application Summary

Application Number: DC/18/00861

Address: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Case Officer: Jo Hobbs

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 remain opposed to this proposal.

The minor changes made to the application to not have an impact on the problems with this proposal already highlighted by the Parish Council.

The latest proposal (in partnership with 1856/17) shows no improvement to the issues with the roads and excess traffic.

Consultee Comments for Planning Application DC/18/00861

Application Summary

Application Number: DC/18/00861

Address: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Case Officer: Gemma Pannell

Consultee Details

Name: Mrs Joanne Culley

Address: 23 Old Rectory Close, Barham, Ipswich, Suffolk IP6 0PY

Email: barhampc@outlook.com

On Behalf Of: Barham Parish Clerk

Comments

Barham Parish Council has mixed views about this development. While many in the Parish accept that housing on this site would be appropriate others have serious concerns over the impact of such a development on the local infrastructure and the environment.

On balance Barham Parish Council objects to this development unless our concerns listed below can be clearly mitigated.

1. Roads are very busy with the current population of the village; any additional vehicles will slow traffic flows during busy periods. What plans are in place to alleviate the village from the pressure of additional traffic?
2. The sewer running through Norwich Road has had its problems over recent years and will need upgrading to cope with the extra demand. Will the sewer be upgraded?
3. The Slade is a unique in the villages of Claydon and Barham and any development that encroaches will seriously impact this feature. How will the developers protect this area?
4. Although, often an eyesore, due to rubbish being dumped, the pit in the North East corner of the site is a haven for wildlife. With many residents asking if the burrowing that is currently taking place is a sign of badgers living locally. Will this area be protected and enhanced as part of the development?

PROPOSED RESIDENTIAL DEVELOPMENT

Land North West of Church Lane, Barham

(Planning Application Number 1856/17)

Updated Review of Transport and Access Issues

(addendum to our previous reports dated June 2018 and February 2019)

Prepared on behalf of:

Barham Parish Council
c/o Mr D Milward (Chair)
1 Lower Farm Cottages
Norwich Road
Barham
IP6 0NU

September 2020

CONTENTS

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1 SCOPE OF THIS TRANSPORT NOTE

- 1.1 In summer 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with the following two planning applications:
- a proposal to construct up to 300 dwellings on land North West of Church Lane, Barham (application number 1856/17); and
 - a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861).
- 1.2 Our findings in respect of application number 1856/17 were presented in a report entitled “Review of Transport and Access Issues” dated June 2018.
- 1.3 In July 2018 we were instructed to extend the scope of our investigations to include application number DC/18/00861 (Ely Road). Our findings in respect of the Ely Road application and the cumulative impact of that scheme in conjunction with the larger scheme off Church Lane Barham were presented in a report entitled “Summary of Transport and Access Issues” dated July 2018.
- 1.4 In February 2019 we were instructed to update our previous advice to take in to account changes that had taken place since June 2018. Our updated advice was presented in a report entitled “ Updated Review of Transport and Access Issues” dated February 2019.
- 1.5 In September 2020 we were instructed to update our previous advice in respect of Planning Application Ref 1856/17 (Land to the North West of Church Lane, Barham) to take in to account changes that have taken place since February 2019.
- 1.6 Our latest advice is presented in this report.

2 OUR PREVIOUS FINDINGS, CONCERNS AND RECOMMENDATIONS

- 2.1 The information presented in the applicants Transport Assessment clearly demonstrates that parts of the local highway network will be operating at, or over, capacity without the new development, the situation is significantly worse when the additional development generated traffic is taken into account.
- 2.2 The applicants do not propose any mitigation measures in the Transport Assessment.
- 2.3 In its consultation response dated 7 August 2017 Suffolk County Council which is the local highway authority (LHA) concluded that there would be a “detrimental impact on the road network” but did not take the matter any further at that time.
- 2.4 We subsequently recommended that the District Council and the LHA should facilitate a coordinated approach to address the transport capacity issues in the locality to ensure that the transport impacts arising from the numerous developments in the area were mitigated in a sustainable, safe and fair manner.
- 2.5 We were concerned that the Transport Assessment was based on July traffic count data because we would expect traffic flows in July to be below the annual average figure.
- 2.6 The applicants computer modelling identified capacity problems at the Station Road junction and at the Claydon Church Lane junctions.
- 2.7 We recommended that the development proposals should be subject to a Stage 1 Road Safety Audit (Stage 1 RSA) before planning permission is granted.
- 2.8 We recommended that this Stage 1 RSA should cover the following:
- the new and modified sections of highway infrastructure proposed as part of the development scheme
 - the sections of the existing highway network that are, or will be, operating close to, or above, capacity
 - the access routes between the application site and the existing schools
 - the access routes between the application site in the village centre

- the route along Barham Church Lane between the application site and the northern outskirts of Ipswich
- 2.9 Following submission of our reports the LHA subsequently met with the developers of sites in Claydon, Barham, Bramford and Sproughton to discuss a cooperative approach to providing improvements to mitigate the highway impacts associated with the various proposed developments.
- 2.10 Barham Parish Council was not a party to these discussions.
- 2.11 We understand from the LHA's revised consultation response dated 11 January 2019 that the LHA concluded that only the Church Lane Barham scheme would have an impact on the Station Road/Norwich Road and Church Road/Norwich Road junctions. The LHA said *"The impact is during the peak hour in the growth year showing significant delays, these are not considered severe. To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below."*
- 2.12 There was no explanation as to how the LHA came to this conclusion. In our fabric 2019 report we requested that the LHA provide the information used to support the LHA's decision. We considered this particularly important given the number of proposed housing schemes being progressed through the planning system, and the fact that the emerging Local Plan had identified sites in the Barham in Claydon area that together total approximately 1900 dwellings.
- 2.13 In our February 2019 report we said:
- "Whilst the LHA's requirements that the Church Lane development should fund improved facilities for pedestrians and cyclists it is not clear how, or if, such improvements will address the traffic issues highlighted in the applicant's transport assessment."* (Para 4.20 That Consultancy Report, February 2019)
- "We therefore conclude that the fundamental issue identity in our previous two reports, this being cumulative traffic impact, has not been satisfactorily addressed."* (Para 4.22 That Consultancy Report, February 2019)

- 2.14 We also noted that the LHA’s consultation response dated 11 January 2019 included a recommended planning condition requiring that “the highway element of the development shall not commence until the Road Safety Audit (stage 1 and 2) process has been carried out...”.
- 2.15 In light of this recommendation from the LHA we reiterated our previous recommendation that:
- the Stage 1 RSA should encompass the wider highway network as documented above and not just the proposed site access and spine road design ; and
 - the RSA should be undertaken before, not after, planning permission is granted.

3 WHAT HAS HAPPENED SINCE FEBRUARY 2019?

- 3.1 An examination of the online planning system shows that our report dated February 2019 was uploaded on 28 February 2019 and again on 13 March 2019.
- 3.2 The next document on the portal is a report by TPA (the transport consultants acting for Pigeon Investment Management in respect of the Church Lane application) dated November 2019 and entitled “Barham and Claydon Highways Package Technical Note”.
- 3.3 We comment on this Technical Note later in this report.
- 3.4 By letter dated 4 December 2019 the LHA issued a revised consultation response. In this response the LHA concluded that *“The development would not have a severe impact on the highway network (NPPF paragraph 109) therefore we do not object to the proposal.”*
- 3.5 The LHA go on to set out 10 proposed conditions and then document the proposed S106 contributions (which relate to the travel plan, public transport, public rights of way and “village highway mitigation measures”).

4 ASSESSMENT OF THE “BARHAM AND CLAYDON HIGHWAYS PACKAGE TECHNICAL NOTE” (TPA, NOVEMBER 2019)

4.1 Paragraph 1.1 of the Technical Note states:

“The purpose of this technical note is to set out the collaborative approach between Suffolk County Council (SCC), Mid Suffolk District Council (MSDC), Pigeon Investment Management Ltd (Pigeon) and M Scott Properties Ltd (MSP) to assess the impacts of development proposals in Barham and Claydon and the delivery of a package of measures through financial contributions for the benefit of the local community.”

4.2 Paragraphs 1.15-1.18 of the Technical Note state:

“1.15 Discussions with SCC and MSDC have been supportive of a collaborative approach between the developers and their consultants which would deliver proportionate contributions towards the proposed package of junction, cycle and pedestrian safety improvement measures.

1.16 As a result Pigeon and MSP have reviewed the schemes and consider that there would be a benefit to Barham and Claydon if the pedestrian and cycle improvements and commitments were considered holistically, where proportionate contributions (based on the impact that each development has at each of the junctions) could be sought from the Norwich Road and Ely Road schemes to enable SCC to deliver a full package including potential pedestrian and cycle improvement works.

1.17 This note provides a summary of potential local infrastructure improvements, including:

- The current draft S.106 contributions for both sites;
- A proposed scheme at the Claydon Church Lane / Norwich Road junction;
- A proposed scheme at the Station Road / Norwich Road junction;
- A financial contribution to extend the current speed limit to the north of the village;

- Financial contributions aimed at providing ‘safer routes to schools’ and key facilities; and
- A financial contribution towards a package of village wide highway improvements.

1.18 Following extensive discussions with Barham & Claydon Parish Councils and Local Members it is recognised that the Financial Contributions proposed for a package of village wide highway improvements can be administered through SCC to be used in conjunction with Barham & Claydon Parish Councils to provide alternative measures which would equally benefit the local community.”

THaT Consultancy Commentary

Section 106 Contributions

4.3 Public rights of way £115,500 (Barham Church Lane Site).

The LHA has identified where sections of the PROW network in the vicinity of the application site requires improvement. These works will improve the local PROW network primarily through surface improvement/repair. The geographical extent of the works is limited and is unlikely to lead to fundamental modal shift.

Pigeon Scheme (paragraphs 2.1-2.2)

4.4 The works described here are those needed to provide access to the proposed development. They are not “public benefits”. They relate to the construction of the site spine road, providing bus stops on the spine road , providing pedestrian and cycle facilities, providing access to the church and providing a Travel Plan for the new development. In our opinion there is no significant public benefit arising from these measures: they are simply needed to provide access to the new development.

Station Road/Norwich Road junction (paragraph 2.4-2.6)

Estimated Cost £50,250

- 4.5 The proposed measures involve minor changes to the existing facilities for pedestrians and cyclists at the junction. In our opinion the proposed improvements/changes may bring about a minor improvement that will benefit pedestrians and cyclists should they choose to use these facilities. Our observations on site, however, suggest that it is unlikely that the cycle facilities will be well used.

Church Lane/Norwich Road junction (paragraphs 2.7-2.9)

Estimated Cost £24,000

- 4.6 The proposals involve minor footway widening, installing tactile paving, cutting back vegetation within highways land and, perhaps, removing the on street car parking bay and Church Lane close to the junction, or amending the Traffic Regulation Order to prevent parking during peak times.
- 4.7 Again, these are very minor changes to the existing situation which will only have a small beneficial effect and will not result in any significant change to the current situation.

Village Wide Cycle Infrastructure Improvement Works (paragraphs 2.10-2.12)

Estimated Cost £14,000

- 4.8 This relates to an unspecified “package of improvement works”.
- 4.9 At paragraph 2.11 the developer explains that:
- “The proposed financial contribution for infrastructure improvement works could be used to deliver the following benefits:*
- *to encourage walking and cycling;*
 - *to provide safer routes to school; and*
 - *to improve safety for pedestrians and cyclists.”*
- 4.10 It would appear from paragraph 1.18 of the report that the developers envisage that this money will be administered by the LHA in conjunction with the Parish Councils.

- 4.11 Since we do not know what these works are it is difficult to understand how the LHA has estimated the figure of £14,000.

Extension of Speed Limit (Paragraphs 2.13-2.16)

Estimated Cost £10,000

- 4.12 In order to ensure reduced vehicle speeds on the southbound approach to the proposed new site access junction the developers proposed to move the existing 30-40 mph speed limit boundary 650 m north.
- 4.13 At paragraph 2.13 the developers acknowledge that this change is needed to accommodate the proposed new site access junction, but then go on to suggest that this “would have wider village benefits due to the reduction in vehicle speeds as they enter the village”.
- 4.14 It is necessary to move the 30 mph speed limit further north simply because the built-up area of the village has been extended further north. In our opinion there is no “wider village benefit” from making this change.

Apportionment of Costs

- 4.15 The estimated costs documented in TPA’s Technical Note and summarised above will be apportioned between the Barham Church Lane and Ely Road schemes.

Mitigation Measures (Paragraphs 3.1-3.11)

- 4.16 At paragraph 3.1 the developers say:
- “Through the finding [stet] of the transport work submitted in support of both the Norwich Road and Ely Road development proposals a mitigation strategy for the schemes has been addressed to minimise congestion caused by vehicle trips through a combination of localised highway infrastructure improvement works and encouraging alternative methods of transport to the private car.”*

4.17 Paragraph 3.2 goes on to say:

“The following four stage approach has been considered:

- *travel plan measures*
- *bus, cycle and pedestrian improvements*
- *Highway measures*
- *smarter choices”*

4.18 In our opinion the measures proposed by the applicant will do little, if anything, to promote sustainable travel choices in preference to the private car.

Conclusions (paragraphs 4.1-4.6)

4.19 At paragraph 4.5 of the technical note the developer states:

“The collaborative approach proposed to SCC and MSDC by the developers has resulted in a proposed package of benefits which should significantly improve transport and access provision within Barham and Claydon to the notable benefit of the local community.”

4.20 We fundamentally disagree with this statement. The “proposed package of benefits” as described in the developers Technical Note and commented on in this report will have minimal beneficial impact. The very small potential benefits arising from these measures have to be weighed against the very significant adverse impacts arising from the additional traffic that the development proposals will introduce onto the local highway network-a network that is already operating at or above capacity without additional development as is shown in the developers Transport Assessment.

5 CONCLUSIONS

- 5.1 We have reviewed the new information submitted since we prepared our previous report in February 2019. As part of these investigations we have assessed the developers proposed “infrastructure improvement schemes” against current guidance and best practice including undertaking a site visit.
- 5.2 Our overarching conclusion is that the concerns we have consistently raised since Summer 2018 have not been satisfactorily addressed.
- 5.3 In particular:
- the concerns and requests for information and clarification made previously have not been answered by either the County Council or the developers.
 - There seems to be a very close working relationship between the County Council and the developers. The developers’ reports and findings seem to have been accepted without any serious challenge by the County Council.
 - The developers’ latest proposals as presented in the Technical Note dated November 2019 will do little, if anything, to improve highway conditions in the village. They will certainly not mitigate the adverse impacts arising from the additional traffic that the proposed development will introduce onto the local highway network.
- 5.4 As congestion and delay increases so do the risks and dangers to all highway users, but particularly vulnerable groups such as pedestrians, cyclists and particularly schoolchildren. It is likely that drivers will seek out “rat runs” such as Barham Church Lane to avoid congestion and delay. Increased use of minor country lanes such as this will lead to an increased risk of accidents.
- 5.5 It should be noted that the “severity test” in Paragraph 109 of the NPPF relates to “residual cumulative impacts on the road network” and not to highway safety. The highway safety implications of a development proposal only have to be considered “unacceptable” by the decision-maker for the development to be refused on highway safety grounds. At present there is no clear guidance from Government as to what constitutes a “severe” or “unacceptable” impact. It is left to the “decision-maker” to make a judgement on a case-by-case basis.

- 5.6 It is clear from all the information we have reviewed in respect of the proposed development that the proposals will create a primarily car-based dormitory community that will introduce significant volumes of traffic on to a road network that is already operating at, or close to, capacity in the peak hours.

PROPOSED DEVELOPMENT OF UP TO 74 DWELLINGS

**Land to the East of Ely Road, Claydon
Planning Application Number DC/18/00861**

Summary Review of Transport and Access Issues

(addendum to our report relating to application number 1856/17 dated June 2018)

Prepared on behalf of:

Barham Parish Council
c/o Barham Parish Clerk
23 Old Rectory Close
Barham
Suffolk
IP6 0PY

July 2018

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1 INTRODUCTION

- 1.1 In June 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17).
- 1.2 Our findings and recommendations were presented in a report dated June 2018. Some of our findings and recommendations were site specific, others however related to the wider area; these are summarised below.

General Findings

- the emerging Local Plan and Strategic Housing and Economic Land Availability Assessment (SHELAA) has identified several potential residential development sites near Barham and Claydon. Together these total approximately 1900 dwellings.

[We understand that at present there are approximately 1600 properties in Claydon and Barham so the emerging residential development sites would more than double the size of the settlement.]

- The Transport Assessment submitted in respect of application number 1856/17 demonstrated that parts of the local highway network (particularly junctions in the village centre) will be operating at, or over, capacity without any additional development and that the additional traffic associated with the proposed development of up to 300 dwellings will significantly worsen the situation.
- The local highway authority commented that *“we have concerns regarding the number of trips created by the development [application number 1856/17] as this would create a considerable amount of additional traffic within a rural village location. The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area.”* [Our emphasis]
- The local highway authority also required a safe walking route to the existing primary school (Claydon primary school) to be assessed and identified in the travel plan to be produced in respect of the 300

dwellings scheme. It should be noted that the route referred to passes along Thornhill Road. We noted that a “serious” personal injury accident occurred on Thornhill Road in December 2015 and that Claydon Primary School is expected to expand by 25% in September 2019.

General Recommendation

- We recommended that the Parish Council should approach the District Council and the County Council to see if they will facilitate a coordinated approach to address the transport capacity issues in the locality to ensure that the transport impacts arising from the numerous developments in the area are mitigated in a sustainable, safe and fair manner.

Land to the East of Ely Road (Application No. DC/18/00861)

- 1.3 At its meeting on 4 July 2018 Mid Suffolk Development Control Committee A considered planning application number DC/18/00861. This application seeks permission to erect up to 74 dwellings on land to the east of Ely Road in Claydon. The application was submitted in outline with all matters except means of access reserved for subsequent approval. The local highway authority had no objection, subject to conditions, and the planning officer recommended that outline planning permission be granted subject to conditions. The Development Control Committee resolved to defer the application to the Referrals Committee.
- 1.4 Following the Development Control Committee’s decision Barham Parish Council instructed THaT Consultancy to review the planning application. Our observations are presented in this Statement.

2 OBSERVATIONS IN RESPECT OF APPLICATION NUMBER DC/18/00861

General Concerns

- 2.1 The application site lies within one of the areas identified in the emerging Local Plan as being potentially suitable for residential development. The 74 dwellings proposed therefore form a part of the approximately 1900 new dwellings identified in the Barham and Claydon area.
- 2.2 The traffic likely to be generated by this proposed development will be distributed on much the same local road network in much the same proportions as the 300 unit scheme to the north of Church Lane (application number 1856/17). We note that the applicant has estimated that approximately 10% of development generated traffic will travel via Thornhill Road (North) and the remaining 90% will use Thornhill Road (South). This means that approximately 90% of development generated traffic will travel through the village using the highway network that has been identified as operating at, or over, capacity without any additional development in the area.
- 2.3 Although this critical section of road network is evaluated in detail in the Transport Assessment submitted in respect of application number 1856/17 no such assessment has been undertaken in respect of application number DC/18/00861. The only junction modelling presented in the Transport Statement submitted in respect of application DC/18/00861 relates to the Thornhill Road/Ely Road priority junction. There is no assessment of the potential impact of development generated traffic beyond this junction.
- 2.4 This is perhaps not surprising given the relatively small number of additional vehicle movements involved. The local highway authority did not require the applicant to consider potential impacts beyond the Thornhill Road/Ely Road junction.
- 2.5 However, we know from the detailed computer modelling undertaken in the context of application number 1856/17 that parts of the local highway network are already operating at capacity. The relatively small amount of additional traffic on these critical sections of the local highway network arising from the proposed development of 74 dwellings will make an already poor situation slightly worse.
- 2.6 The likely effect of increasing traffic flows through the village, without any mitigation measures, will be to alter the character of the road network and give more importance to its “movement” function in preference to its “place” function.

- 2.7 When commenting on application number 1856/17 the local highway authority noted that:
- “The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area.”*
- 2.8 The computer modelling submitted in the context of application number 1856/17 shows how unstable traffic conditions can be when the highway network is operating at, or above, capacity. In these circumstances even small increases in traffic flow can have a disproportionately large impact.
- 2.9 This point is made, albeit in a different context, in Paragraph 6.1 of the Transport Statement submitted in respect of application number DC/18/00861, which states:
- “An RFC [ratio of flow to capacity] value greater than 1.0 means that a turning movement has a higher level of traffic flow than its theoretical capacity. As a result, flows breakdown and queues can be expected. An RFC below 0.85 is considered acceptable as there is still scope to accommodate future growth.”*
- 2.10 We suggest therefore that the District Council, in consultation with the local highway authority, has to decide whether or not it is prepared to permit new developments knowing that each development will have a small detrimental impact on the operation of the highway network in the village, but knowing that the cumulative impact of the various emerging housing developments is likely to be significant.
- 2.11 This is likely to be a particular cause for concern if the number of dwellings in the settlement doubles which seems possible given the emerging Local Plan and its supporting information.
- 2.12 It should be noted that the vehicle trip rates used in the Transport Statement in respect of application number DC/18/00861 are lower than those observed at Old Rectory Close and utilised in the Transport Assessment in respect of application number 1856/17. The trip rates used in respect of DC/18/00861 are only 76% of the observed figure in the AM peak and only 66% in the PM peak.
- 2.13 It is possible therefore that the Transport Statement submitted in respect of application DC/18/00861 has underestimated the likely number of vehicle movements that the proposed development will generate.

- 2.14 The survey at Old Rectory Close showed a daily trip rate of 5.394 vehicle movements per dwelling. If this daily trip rate is applied to the proposed development of 74 dwellings at Ely Road, then the proposed development can be expected to generate approximately 400 vehicle movements per weekday.

Site Specific Concerns

- 2.15 We note that the applicants are proposing a carriageway width restriction at the point where the proposed site access road meets Ely Road. This will be created by installing a 1 m wide buildout on each side of the carriageway. The buildout on the southern side of the carriageway will also act as a footway.
- 2.16 Based upon the information currently available to us it would appear that this arrangement is proposed because the applicants do not control sufficient land to provide a conventional highways layout at the point where the proposed new site access road meets the end of Ely Road.
- 2.17 The recommended minimum footway width is 2.0 m. This is what is proposed within the application site. A width of 1.0 m will enable an adult to walk on their own along this stretch of footway, but it is not wide enough to enable an adult to walk with a child by their side.
- 2.18 To address this concern the applicants intend providing an uncontrolled pedestrian crossing either side of the width restriction. The expectation, presumably, is that pedestrians walking along the south side of Ely Road/site access road will cross to the north side at the width restriction.
- 2.19 We think this is an unrealistic expectation, and that the reality is likely to be that pedestrians will step into the carriageway.
- 2.20 Given that the main pedestrian desire line is likely to be between the application site and Thornhill Road (south) i.e. the route to/from the schools and village centre, we suggest that the proposed site access arrangements are reviewed to ensure that the safety of vulnerable road users is not prejudiced.

2.21 Paragraph 4.5 of the Transport Statement states:

“...the proposed buildouts will also function as a traffic calming feature and entrance into the proposed 20 mph zone.”

2.22 As well as implementing a 20 mph zone within the site we suggest that it would be beneficial in highway safety terms to introduce a 20 mph speed limit on Ely Road and Thornhill Road as well. This will serve to constrain vehicle speeds on an important route to/from the nearby schools. The 20 mph speed limit could, of course, be extended to include the wider residential area.

2.23 We note that the automatic traffic count surveys undertaken by the applicant and presented in the Transport Statement show average vehicle speeds on Thornhill Road to be 26 mph, and the 85th percentile speed to be 32 mph. The speed limit is 30 mph.

2.24 The maximum design speed for residential streets should normally be 20 mph. Clearly observed vehicle speeds on Thornhill Road are well above this figure. However, given the width of Thornhill Road, its relatively straight alignment and excellent forward visibility, the observed speeds are what would be expected.

2.25 Thornhill Road is an important route to/from the schools to the south and is used by pedestrians, cyclists and motorists.

2.26 Given the increased use of Thornhill Road that will result from the proposed new residential developments in the area, together with the increases that will result from the expansion at the primary school, we consider it appropriate to implement measures now to make the route safer and, more attractive, to pedestrians and cyclists.

3 SUMMARY

- 3.1 The proposed development of up to 74 dwellings on land to the east of Ely Road (application number DC/18/00861) is one of a series of housing schemes in the Barham and Claydon area that are at various stages in the planning process. When considered in isolation this scheme will have only a very small adverse impact on traffic conditions on the highway network in the settlement. However, when the cumulative impact of the various schemes is taken into consideration it is apparent that the impacts are likely to be severe and that the character of the area will change.
- 3.2 We therefore recommend that the various public bodies should formulate a coordinated approach to address the transport capacity issues in the locality to ensure that the transport impacts arising from the various developments are mitigated in a sustainable, safe and fair manner.
- 3.3 The proposed site access arrangements serving the Ely Road site will put pedestrians at risk. We therefore recommend that the access arrangements are revised to ensure that vulnerable road users are protected.
- 3.4 Vehicle speeds on Thornhill Road are relatively high (an observed 85th percentile design speed of 32 mph) compared to 20 mph which is the recommended maximum design speed for residential streets.
- 3.5 Thornhill Road is an important route to/from the nearby schools. Given the fact that the primary school schedule to expand by 25%, and the additional housing proposed in the area (including the site at Ely Road) it is likely that Thornhill Road will become significantly busier in the future. In order to make it a safe and attractive route for pedestrians and cyclists we recommend that consideration be given to implementing a 20 mph speed limit on Thornhill Road and the surrounding area.

PROPOSED RESIDENTIAL DEVELOPMENTS IN BARHAM AND CLAYDON

Land North West of Church Lane, Barham

(Planning Application Number 1856/17)

and

Land to the East of Ely Road, Claydon

(Planning Application Number DC/18/00861)

Updated Review of Transport and Access Issues

(addendum to our previous reports dated June and July 2018)

Prepared on behalf of:

Barham Parish Council

c/o Barham Parish Clerk

23 Old Rectory Close

Barham

IP6 0PY

February 2019

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1 SCOPE OF THIS TRANSPORT NOTE

1.1 In summer 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with the following two planning applications:

- a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17); and
- a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861).

1.2 This Transport Note updates our previous advice to consider any new information, or changes, that have taken place since summer 2018.

2 BACKGROUND

2.1 In June 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17). Our findings and recommendations were presented in a report dated June 2018. This report was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response on this planning application.

2.2 In July 2018 Barham Parish Council instructed THaT Consultancy to review the transport and access issues associated with a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861). Our findings and recommendations were presented in a report dated July 2018 which was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response in respect of this planning application.

2.3 Some of our findings and recommendations were site specific, others however related to the wider area and focused particularly on the cumulative traffic impact of the various development proposals that are being progressed through the planning system either by way of planning applications or via potential allocations in the emerging Local Plan.

3 WHAT HAS HAPPENED SINCE JULY 2018?

- 3.1 We understand that Suffolk County Council, as the local highway authority, shared the concerns we highlighted regarding cumulative traffic impact and subsequently invited both applicants to meet with the local planning authority and the local highway authority to discuss a cooperative approach to providing improvements to mitigate the highway impacts.
- 3.2 Barham Parish Council was not invited to take part in these discussions.
- 3.3 Despite both applicants subsequently submitting revised layouts and supporting information (which was of sufficient magnitude to necessitate both applications being re-consulted on) there does not appear to have been any significant new information submitted by either applicant in respect of highway and transport matters.
- 3.4 It is possible that investigations were undertaken that have not been incorporated into Babergh and Mid Suffolk District Councils' online planning system. If this is the case, then we would request that this information be provided to the Parish Council as a matter of urgency.

Land North West of Church Lane Barham (application number 1856/17)

- 3.5 An examination of the online planning system shows that our previous report was uploaded on 2 July 2018 and on 18 July 2018 local highway authority wrote inviting the applicant to meet with the local planning authority and local highway authority. No new information was submitted until December 2018 when the applicant submitted revised illustrative proposals.
- 3.6 As far as we are aware the applicant has not submitted any new transport related information following submission of our previous report and the subsequent letter from the LHA.
- 3.7 By letter dated 11 January 2019 the LHA submitted a revised consultation response in which they propose various highways/transport related conditions, including the requirement for a Section 278 Agreement and a Section 106 Agreement.

3.8 In this response the LHA explains that:

“Following the previous response asking for the cumulative effect of developments on junctions in Claydon, Barham, Bramford and Sproughton, meetings have taken place including all the developers for these sites. It has been concluded only this development has an impact on Station Road/Norwich Road and Church Road/Norwich Road junctions. The impact is during the peak hour in the growth year showing significant delays, these are not considered severe. To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below.” [STET]

3.9 The LHA then proposes a series of 10 conditions these encompass:

- 1 visibility splays
- 2 Road safety audit
- 3 parking and manoeuvring space
- 4 detailed design of estate roads
- 5 roads to be provided before properties occupied
- 6 surface water drainage
- 7 storage areas for refuse/recycling bins
- 8 effectively a construction management plan
- 9 landscaping
- 10 S278 *“Prior to occupation of the development, the pedestrian and cycling improvement details at Norwich Road/Station Road junction and Norwich Road/Church Road junctions at to be submitted and approved by the local planning authority. The approved scheme shall be laid out, constructed and made functionally available for use by the occupiers of the development prior to the occupation of the first dwelling and thereafter retained in the approved form for the lifetime of the development.” [STET]*

- 3.10 The Section 106 agreement encompasses a travel plan, enhancing public transport provision and improvements to the Public Rights of Way network.
- 3.11 No mention is made of any requirement to specifically mitigate the traffic impacts that will arise as a result of the proposed development.

Land to the East of Ely Road Claydon (Application Number DC/18/00861)

- 3.12 An examination of the local planning authority's online planning system shows that no further transport related information was provided by the applicant following submission of our previous report which was entered into the system on 13 August 2018.
- 3.13 By letter dated 28 November 2018 the LHA issued a revised consultation response in which they explained that:
- "Further analysis of the Barham and Claydon TAs showed the east of Ely Road application the predicted queue lengths on Station Road and Church Lane were 1 vehicle or below during the peak hour periods. Therefore, we do not consider any mitigation is required from this development."* [STET]
- 3.14 The LHA goes on to say:
- "Taking all the above into account, it is our opinion that this development would not have a severe impact (NPPF para 109) therefore we do not object to the proposal and advise the conditions and contributions previously given in our response dated 21st March 2018."*
- 3.15 It is not clear from the information publicly available how the LHA established the impact of the Ely Road scheme on the Station Road and Church Lane junctions because these were not modelled in the transport statement submitted by the applicants.
- 3.16 Revised illustrative proposals and supporting documentation were submitted by the applicant in February 2019. No detailed transport/highway information was submitted with the revised proposals other than a swept path analysis to show how a refuse vehicle could turn within the road network shown in the revised illustrative site layout.

4 THAT CONSULTANCY'S ASSESSMENT OF THE CURRENT SITUATION

- 4.1 It is not clear from the information available on the local planning authority's online system what, if any, detailed investigations were undertaken to establish the cumulative transport, and particularly traffic, impact of the various development proposals in Barham and Claydon.
- 4.2 If detailed investigations have been undertaken leading to the local highway authority issuing its latest consultation responses then, in our opinion, this information should be made available for public scrutiny and, if appropriate, challenge.
- 4.3 As things stand the local highway authority has concluded that no mitigation measures are required in respect of the Ely Road scheme and some form of pedestrian and cycle mitigation measures are required in respect of the Church Lane scheme. No information is currently available to explain how the local highway authority reached these conclusions.
- 4.4 The local highway authority has previously said:
- "We have concerns regarding the number of trips created by the development [application number 1856/17] as this would create a considerable amount of additional traffic within a rural village location. The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area." [Our emphasis] (Ref. previous LHA consultation response on application 1856/17)*
- 4.5 The Ely Road scheme will further increase traffic on the same road network.
- 4.6 Given the serious transport and highway related concerns raised by the Parish Council and local residents, and given the LHA's previous documented concerns, we consider that the cumulative impact of the various development proposals should be evaluated in an open, and transparent, manner to ensure that the decision-making process is fair and robust.
- 4.7 Based upon the information currently available to us we cannot conclude that the cumulative impact of the various development proposals has been satisfactorily addressed.

- 4.8 In our opinion, based upon information currently available to us, we consider it very important that the local planning authority and the local highway authority address the issue of the cumulative traffic impact of the development proposals in the area. Failure to do so at this stage will almost certainly mean that traffic conditions on the local highway network will worsen significantly over the next few years.
- 4.9 The Transport Assessment submitted in respect of the Church Lane scheme (application number 1856/17) demonstrated that parts of the local highway network (particularly junctions in the village centre) will be operating at, or over, capacity by 2022 without any additional development. The additional traffic associated with the proposed development of up to 300 dwellings would significantly worsen the situation. The Ely Road proposals were not taken into consideration in this analysis but will add additional traffic onto the same road network. It is therefore reasonable to assume that should the Ely Road scheme be approved then the traffic situation would be even worse than that forecast in the Transport Assessment submitted in respect of the proposed development at Church Lane.
- 4.10 The local highway network is currently operating at, or close to, capacity. At present congestion and queueing are a feature of the local highway network, but are not at a level where we would expect the local highway authority to take action given the numerous conflicting demands on the public purse.
- 4.11 However, once the traffic carrying capacity of a highway network is exceeded then congestion and traffic queues increase rapidly. This inevitably leads to delay, frustration and inconvenience for all highway users. Some drivers will start to look for alternative, and perhaps unsuitable, routes to avoid congestion. Some drivers will also start to take unnecessary risks (e.g. forcing their way out of junctions) leading to a detrimental impact on highway safety.
- 4.12 The “knife edge” situation on the local highway network is clearly demonstrated in the traffic modelling presented in the Transport Assessment submitted in support of the Church Lane application. As part of this Transport Assessment the operation of the Claydon Church Lane/Ipswich Road priority junction was modelled. The results of this analysis are summarised in paragraphs 8.18-8.27 of the Transport Assessment report. The output from the computer modelling is presented at Appendix N of the Transport Assessment.

- 4.13 By reference to Figure Number 6.2 of the Transport Assessment we see that the proposed Church Lane development will only result in 1 additional vehicle movement on Claydon Church Lane in the AM peak hour, this being a single vehicle turning left into Claydon Church Lane from the north.
- 4.14 Table 8.6 of the Transport Assessment summarises the output of the computer modelling of this junction in 2022 both with, and without, the additional traffic forecast to be generated by the Church Lane development.
- 4.15 It will be noted that in the AM peak hour the turning movements out of Claydon Church Lane are forecast to be operating just above capacity (the actual figures being 102% and 104% of capacity) without the Church Lane development. However, once the additional traffic associated with the Church Lane development is taken into account then the queues on Claydon Church Lane double in length and the turning movements out of Claydon Church Lane are forecast to operate at between 126% and 129% of capacity.
- 4.16 In Table 8.7 of the Transport Assessment the applicants break down the hourly results presented in Table 8.6 into 15 minute intervals and argue that the capacity issues are likely to be concentrated into a single 15 minute period. In this table they present the RFC (ratio of flow to capacity) and queue length for the left turn out of Claydon Church Lane and the right turn out of Claydon Church Lane is presented in Appendix N of the transport assessment.
- 4.17 Whilst the RFC and queue length are very important parameters when assessing the operation of the junction it is also useful to consider the average delay per vehicle because this clearly demonstrates just how sensitive the operation of a junction can be to relatively minor changes in traffic flow when the junction is operating at or above capacity. In Table 1 below we have presented the delay per vehicle as taken from Appendix N of the applicants' Transport Assessment.

	Left turn out of Claydon Church Lane			Right turn out of Claydon Church Lane		
	Without Dev	With Dev	Increase	Without Dev	With Dev	Increase
08:00 – 08:15	16.5	23.2	6.7	37.3	60.7	23.4
08:15 – 08:30	88.2	187.1	98.9	189.8	291.7	101.9
08:30 – 08:45	40.3	221.4	181.1	67.6	316.2	248.6
08:45 – 09:00	23.2	90.1	66.9	32.9	152.5	119.6

Table 1 Delay (s) at the Claydon Church Lane Junction with and without the Proposed 300 Dwellings
2022 AM peak hour
(Information Extracted from the Applicant’s Transport Assessment)

- 4.18 It will be noted that the additional traffic associated with the proposed development of 300 dwellings will result in significant increases (typical increases of approximately 1-4 minutes) in the length of time it takes to turn out of Claydon Church Lane.
- 4.19 It should also be noted that whilst these significant increases in delay are as a result of the additional traffic associated with the proposed development of 300 dwellings the delays will not be experienced by development generated traffic, but rather by existing traffic turning into Norwich Road/Ipswich Road. The proposed development of 300 dwellings only results in 1 additional vehicle movement on Claydon Church Lane and that vehicle is turning into Claydon Church Lane not out of Claydon Church Lane.
- 4.20 Whilst the LHA’s requirements that the Church Lane development should fund improved facilities for pedestrians and cyclists it is not clear how, or if, such improvements will address the traffic issues highlighted in the applicant’s transport assessment.
- 4.21 Although we have focused on the transport assessment submitted in support of the Church Lane proposals this is only because it represents the most detailed information currently available to us. The Ely Road scheme will also add additional traffic onto the local highway network and exacerbate the problems highlighted above.
- 4.22 We therefore conclude that the fundamental issue identified in our previous two reports, this being cumulative traffic impact, has not been satisfactorily addressed.

Site Specific Concerns

4.23 In our previous reports we also raised a series of site-specific concerns. It does not appear, on the basis of information currently available to us, that these have been adequately addressed. For the sake of convenience these concerns and/or recommendations are summarised below.

Land to the East of Ely Road

4.24 We note that the applicants are proposing a carriageway width restriction at the point where the proposed site access road meets Ely Road. This will be created by installing a 1 m wide buildout on each side of the carriageway. The buildout on the southern side of the carriageway will also act as a footway.

4.25 Based upon the information currently available to us it would appear that this arrangement is proposed because the applicants do not control sufficient land to provide a conventional highways layout at the point where the proposed new site access road meets the end of Ely Road.

4.26 The recommended minimum footway width is 2.0 m. This is what is proposed within the application site. A width of 1.0 m will enable an adult to walk on their own along this stretch of footway, but it is not wide enough to enable an adult to walk with a child by their side.

4.27 To address this concern the applicants intend providing an uncontrolled pedestrian crossing either side of the width restriction. The expectation, presumably, is that pedestrians walking along the south side of Ely Road/site access road will cross to the north side at the width restriction.

4.28 We think this is an unrealistic expectation, and that the reality is likely to be that pedestrians will step into the carriageway.

4.29 Given that the main pedestrian desire line is likely to be between the application site and Thornhill Road (south) i.e. the route to/from the schools and village centre, we suggest that the proposed site access arrangements are reviewed to ensure that the safety of vulnerable road users is not prejudiced.

4.30 Paragraph 4.5 of the Transport Statement states:

“...the proposed buildouts will also function as a traffic calming feature and entrance into the proposed 20 mph zone.”

- 4.31 As well as implementing a 20 mph zone within the site we suggest that it would be beneficial in highway safety terms to introduce a 20 mph speed limit on Ely Road and Thornhill Road as well. This will serve to constrain vehicle speeds on an important route to/from the nearby schools. The 20 mph speed limit could, of course, be extended to include the wider residential area.
- 4.32 We note that the automatic traffic count surveys undertaken by the applicant and presented in the Transport Statement show average vehicle speeds on Thornhill Road to be 26 mph, and the 85th percentile speed to be 32 mph. The speed limit is 30 mph.
- 4.33 The maximum design speed for residential streets should normally be 20 mph. Clearly observed vehicle speeds on Thornhill Road are well above this figure. However, given the width of Thornhill Road, its relatively straight alignment and excellent forward visibility, the observed speeds are what would be expected.
- 4.34 Thornhill Road is an important route to/from the schools to the south and is used by pedestrians, cyclists and motorists.
- 4.35 Given the increased use of Thornhill Road that will result from the proposed new residential developments in the area, together with the increases that will result from the expansion at the primary school, we consider it appropriate to implement measures now to make the route safer and, more attractive, to pedestrians and cyclists.

Church Lane, Barham

- 4.36 We previously recommended that the development proposals should be subject to a Stage 1 Road Safety Audit (RSA) before planning permission is granted. A Stage 1 RSA is normally undertaken at the planning stage.
- 4.37 We suggested that this RSA should cover the following:
- the new and modified sections of highway infrastructure proposed as part of the development scheme
 - the sections of the existing highway network that are or will be operating close to, or above, capacity

- the access routes between the application site and the existing schools
- the access routes between the application site and the village centre
- the route along Barham Church Lane between the application site and the northern outskirts of Ipswich

4.38 We note that in its latest consultation response dated 11 January 2019 the LHA recommended that a condition be applied stating:

“The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied/open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.”

4.39 The proposed development has highway impacts that extend beyond the proposed site access and associated spine road. To ensure that highway safety issues are not compromised should the LPA be minded to approve this application, we consider it important that the Stage 1 RSA be undertaken before permission is granted and that the scope of the RSA should encompass the items set out above and not just the proposed site access and spine road design.

Consultee Comments for Planning Application 1856/17

Application Summary

Application Number: 1856/17

Address: Land North West Of Church Lane Barham Suffolk

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Case Officer: Jo Hobbs

Consultee Details

Name: Mrs Joanne Culley

Address: 23 Old Rectory Close, Barham, Ipswich, Suffolk IP6 0PY

Email: barhampc@outlook.com

On Behalf Of: Barham Parish Clerk

Comments

Barham Parish Council objects to both the Ely Road (DC/18/00861) and Church Lane (1856/17) developments.

The recent Barham and Claydon Highways Package Technical Note which has been commissioned by the developers does nothing to allay the concerns of the Parish Council and Barham residents.

The Section 4 Conclusions part of the document confirms the Parish Council's suspicions that these developments are a collaborative approach between SCC, MSDC, Pigeon, MSP and their respective transport consultants TPA and CCE has resulted in proposals for the delivery of a package of measures to notably benefit the local communities of Barham and Claydon with little regard to the wishes of local residents or the views of their local representatives.

Although a number of meetings have taken place between the developers, MSDC and SCC and the Parish Council we feel our views have always been side-lined in favour of the requirements of the developers. Indeed paragraph 4.6 only exists because the developers would not accept alternative suggestions made by the parish council. The Parish Council has significant concerns with SCC having control of the funds as to date they have not taken onboard the views/concerns of the Parish Council.

The Parish Council believes that the mitigations proposed in section 3 are a minimalist approach with no guarantees that any of the strategies will be delivered.

Section 3 states The development proposals include a number of site specific and off-site works and contributions that promote travel by bus, cycle and walking. How can this report claim to promote travel by bus when Suffolk County Council has cut subsidies to bus services in the area which has reduced the number of buses serving Barham? Also, one of the earlier proposals to promote cycling included turning the footpath that runs beside Claydon Primary School into a cycle way. We are appalled at that suggestion as it would result in cyclists riding down this gradient (alongside the high hedge) coming into immediate conflict with parents and children as they enter and exit the school gate by Lancaster Way.

Designing such a dangerous scenario into the travel plan suggests this is a desk-top exercise rather than the result of on-site fieldwork.

As a Parish Council we are unable to identify any positive benefits for local residents from the highway improvements proposed in the appendices.

**OBJECTION TO THE DEVELOPMENT, THE FOLLOWING COMMENTS
TAKEN FROM THE TPA HIGHWAYS TECHNICAL NOTE**

Lost Forever



Having read the recent report from TPA, the company representing Pigeon Investments Ltd, they seem to have made a very convincing argument to the council mainly based on financial contributions that are deemed to be a benefit to the village.

So, as the villagers we must all stand up to this and not allow this to be bulldozed through on technical jargon, or through financial benefits. (Community Infrastructure Levy)

The below extracts from TPA document are in Black and my responses in Red or importance in yellow or red highlighted.

I am amazed the council are so ready to buy into this scheme when it goes against everything in their documentation, regulation and guidelines, as unsustainable.

Is this really all it takes to destroy our heritage and historic buildings, farming and the sustainability and peace of our village.

The size of these projects are way too big and with all the other developments in the area this will be more than the number of required houses.

I cannot believe that the introduction of 260 barham, 70 ely road, 190 Whitton, 50+ from infill projects totalling 570, minimum, houses is not going to have an impact on our roads, which are already under strain.

Below extracts from the TPA report.

1.1 The purpose of this technical note is to set out the collaborative approach between Suffolk County Council (SCC), Mid Suffolk District Council (MSDC), Pigeon Investment Management Ltd (Pigeon) and M Scott Properties Ltd (MSP) **(NOT THE VILLAGE)** to assess the impacts of development proposals in Barham and Claydon and the delivery of a package of measures through financial contributions for the benefit of the local community.

ANS. Was there no representation from the villagers or the parish council or anyone with an objective opinion? Their solution to the problem is financial measures and contributions to the Suffolk County Council.

1.2 Transport Planning Associates (TPA) are instructed by Pigeon to provide transport planning and highway infrastructure design consultancy services in respect of their development of Land off Norwich Road, Barham and Claydon, Suffolk.

ANS. Instructed by the land promotor so they are NOT going to say that the development is unsustainable, are they? Their speciality, as a company, is getting permissions granted when there is objection from the community or technicalities they need to traverse, so how can they offer an opinion to the council.

What has happened to the THaT consultant's report, to which we have seen no response from the Council?

Pigeons previous consultants carried out their last traffic report in school holidays, we need a new independent report to be carried out on all surrounding developments and roads by an independent consultant to arrive at a fair conclusion.

1.4 The scheme proposals have been considered by SCC, in their role as the Local Highway Authority, and the scheme proposed has been supported and recommended for approval subject to a number of planning conditions and obligations.

ANS. Since SCC has taken the role of Local Highway Authority please can we see the evidence and reports to support this critical decision. This applies to both developments, Barham and Ely road.

1.7 Following MSDC Planning Committee meetings both the Norwich Road and Ely Road sites were deferred to the Council's Referrals Committee with a request that SCC should consider the cumulative highway impact of four proposed residential sites which total approximately 600 residential dwellings. In summary the four sites are as follows:

- Land off Norwich Road, Barham (Pigeon development site);
- Land east of Ely Road, Claydon (Scott Properties development site);
- Land to the east of The Street, Bramford (Planning reference 18/00233); and
- Land east side of Bramford Road, Sproughton (Planning reference 18/02010)

ANS. Why have they used Bramford and Sproughton as sites that will affect Barham-Claydon and not the 3500 houses at Westerfield and Henley Road and Westerfield is having another 100 houses being built now. Also, the new Whittan development 190 houses, the extra houses from Persimmon and Hopkins homes in GT Blakenham and Needham Market 300 and the other 200 houses from small infill sites!!!!!! WHAT IMPACT DO THESE HAVE??????

This point was raised at the last meeting by Mrs Guthrie, that consideration needs to be taken to account for **ALL the developments** and their impact consecutively and not each development individually. (I wonder if she would approve of this report and its non-inclusion of the majority of the surrounding developments that will have a severe impact on the roads)

I think we should know why the Councils Referral Committee chose these specific developments, and not other ones that will have more of an impact? How do they choose the developments so specifically?

1.9 At the initial meeting SCC were actioned to consider the impacts of the developments at each of the junctions where it was concluded that there was a limited impact from the Claydon sites on the junctions within Bramford and Sproughton and a limited impact from the Bramford and Sproughton sites on the junctions within Claydon. As a result, SCC refined the need for cumulative assessments of the original four junctions to that of the two within Barham and Claydon.

ANS. Of course, there is limited impact on each other because these are not the developments that are going to affect these roads and junctions, as your report has proved, conveniently.

Try taking the developments I have mentioned above into consideration.

1.10 Following the meeting TPA and CCE reviewed the impacts resulting from the Ely Road and Norwich Road schemes on the two junctions and concluded that there was not a severe cumulative impact.

ANS. TPA and Cannon Consulting Engineers provide planning and design focused consultancy advice to the development industry so they can get planning. Again, why would they say it is unsustainable.

I think it is amazing that the council MSDC and SCC are taking advice from the Land promotion companies consultants.

Both these companies support developments where they have considerable financial gain, where is the impartial consultation that a neutral council should be providing?

1.13 TPA and CCE agree with the conclusions of SCC that there is not a severe impact resulting from the proposed schemes in isolation or cumulatively.

ANS. Again, it does not matter how many times you say "it will not be severe", you have taken into consideration the wrong developments very conveniently.

Please can you also take into consideration the traffic from the new school that has land allocated for it, when making your calculations.

2.11 The proposed financial contribution for infrastructure improvement works could be used to deliver the following benefits:

- To encourage walking and cycling;
- To provide safer routes to schools; and
- To improve safety for pedestrians and cyclists.

2.12 The cost of these works has been estimated by SCC as £14,000

ANS. How are you going to encourage people to walk and cycle, how are you going to tell people which routes to take and say they are safer. Is this for every road in the village as new traffic will be coming in on every road. This will be difficult to implement whilst you are reducing the bus routes constantly.

4.1 A collaborative approach between **SCC, MSDC, Pigeon, MSP and their respective transport consultants TPA and CCE** has resulted in proposals for the delivery of a package of measures to notably benefit the local communities of Barham and Claydon.

ANS. I am glad to see that all the people who benefit financially from the development were present!!! When deciding the benefit of the village should the villagers more importantly the parishioners be present or are they merely going to be instructed by SCC and developers what is best for them.!

Perhaps would it be more democratic if the members of the Claydon and Barham Community were asked their opinion by their council, if they are going to have an extra 2000+ car journeys through the village each day what benefit are they going to get.

Have they asked the Claydon and Barham community??? I think you'll find most of our comments are objecting, even with the financial benefits and promises.

4.2 SCC have considered the impacts of the schemes in isolation and cumulatively (**WHICH PROJECTS?**) and consider that there is no residual cumulative impact and therefore no highway improvement works are required. However, it is proposed by the developers that there would be wider benefits to Barham and Claydon if the proposed infrastructure improvement works at the Station Road and Claydon Church Lane junctions were delivered through proportionate contributions from the Norwich Road and Ely Road schemes.

ANS. I cannot believe that there is no residual impact after reports from LHA and THaT consultants that say quite the opposite.

We should be entitled to see the complete report and I have not seen this on the planning portal.

4.3 The proposed financial contribution for the package of infrastructure improvement works together with infrastructure improvement works being promoted as part of each of the schemes are considered to represent a significant betterment within Barham and Claydon.

ANS. Whose opinion is this, and how can anyone judge this situation without being a member of the community.

4.5 The collaborative approach proposed to SCC and MSDC by the developers has resulted in a proposed package of benefits which should significantly improve transport and access provision within Barham and Claydon to the notable benefit of the local community.

ANS. Really!! what is the impact on Bulls road and Coopers road. Have the locals been asked if they think this is a benefit or are we just being forced into this development.

There has to been a third-party consultation after this report with all parties and representative involved, council, village residents, parish councillors, consultants and developers.

Report Highways England

Following the previous response asking for the cumulative effect of developments on junctions in Claydon, Barham, Bramford and Sproughton, meetings have taken place including all the developers for these sites. **It has been concluded only this development has an impact on Station Road/Norwich Road and Church Road/Norwich Road junctions. The impact is during the peak hour in the growth year showing significant delays, these are not considered severe!!!!!!!!!!!!** To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below.

ANS. How can the development of barham church lane be the only development to affect the Barham church lane????

The new NPPF sets out more clearly the requirement to consider road safety as per of the para. 109 'severe test'.

We understand that Suffolk County Council, as the local highway authority, shared the concerns we highlighted regarding cumulative traffic impact and subsequently invited both applicants to meet with the local planning authority and the local highway authority to discuss a cooperative approach to providing improvements to mitigate the highway impacts. 3.2 Barham Parish Council was not invited to take part in these discussions.

Has the Stage 1 RSA been undertaken and what are the results?

NPPF 109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Historic England Recommendation

Historic England welcome the revisions that have been made to reduce the impact of the development on the adjacent heritage assets. **However, we still retain concerns on heritage grounds because of the impact on the Church of St. Mary. This would result in some, modest, harm to its significance and this should be weighed against the public benefits the scheme would deliver in line with the Framework.**

Planning and Design Group report for Barham and Claydon Parish extracts

Principle of Development (Location and Scale) Notwithstanding the absence of five-year housing land supply at the time of submission, in May 2017, the proposed application site falls outside of Claydon's northern settlement boundary (as defined in Proposal 1 of the 'saved' Mid Suffolk Local Plan 1998) and therefore into a countryside location. The local planning policy framework seeks to restrict residential development in the countryside, specifically through policy H7 of the Local Plan

which states: 'In the interests of protecting the existing character and appearance of the countryside, outside settlement boundaries there will be strict control over proposals for new housing.'

The proposals fail to meet the principles of Core Strategy policy CS1 which, within the supporting text, states that 'care must be taken to ensure that development is directed to locations where it will have the greatest benefits for rural sustainability'. As such full market housing development is not considered suitable for either land allocation or speculative planning applications in Key Service Centres. Only infill housing development within settlement boundaries is considered appropriate for relevant settlements such as Claydon.

To the north of this application site is land identified for further development potential. In the most recent Land Availability Assessment ('LAA') both sites are referred to as SS0076 and SS0551 respectively. The Parish Council feel that if this application for some 270 homes is consented it will establish a very dangerous principle for further development. As such it would be reasonable to expect subsequent future planning applications proposing development of land to the north of this application site. If all land was developed this would amount to the disproportionate introduction of some 600 new homes (effectively doubling the size of Claydon) and completely remove the countryside break between Claydon and the built-up area around Sandy Lane. This does not reflect a sustainable or a sound planning approach. Therefore, 5 The Parish Council restate their objection and would like to reiterate the risks of consenting this application to MSDC.

Indeed, as of March 2018 MSDC officers were minded to refuse this application on technical grounds. This was particularly in relation to the quality of ecological, landscape, archaeological, heritage and highway evidence. Subsequently, the application was deferred and the scheme revised however, The Parish Council maintain that some matters have not and will unlikely be resolved adequately to justify a recommendation for approval.

In relation to highway and access matters, The Parish Council would like to draw attention again to the technical report prepared by THaT Consultancy in June 2018 entitled a 'Review of Transport Issues'. The technical matters of this report will not be duplicated however, the conclusions stated that the existing highway network was not considered adequate to accommodate the cumulative impact of this and wider committed / proposed development in the locality of Mid Suffolk. Therefore, presenting a very real risk that the highway impact of this and neighbouring schemes is 'severe' and as such, in excess of the NPPF tolerance threshold. Further capacity testing and a Road Safety Audit (during the application period) were also recommended by the THaT Consultancy report. These concerns were reiterated by Suffolk County Council ('SCC') in a letter dated the 18th July 2018. This letter listed a range of local, cumulative development proposals and raised the prospect of severe traffic impacts on local junction capacity, also stating: 'With the increase in congestion, the concern is traffic may divert onto other routes which are unsuitable for the increase in traffic. Also, pedestrian safety in these built up areas could be compromised where they are trying to cross roads between queuing cars so not visible to other drivers. The additional traffic generated by the cumulative effect from the developments at these junctions show an increase in queuing and delays for 6 all users therefore, we consider a co-operative approach to give an opportunity to provide improvements to mitigate against the significant impacts. We would like to invite applicants to attend a meeting with the Local Planning Authority and ourselves to discuss further options.'

Summary

In summary, The Parish Council maintain their objection this outline application. The principle for development on this site is severely diminished by virtue of its location in the countryside, excessive

scale and weight of cumulative negative technical impacts. The Parish Council consider that there are significant planning policy grounds on which to refuse this application and trust that this letter, alongside all related prior communication from The Parish Council, is considered very seriously by MSDC.

THaT consultants extract

Since then the road report by ThaT consultants under instruction of the Barham Parish Council, which is more accurate as it was not carried out in the school holidays, shows the severe impact this will have on the roads, making them **completely unsustainable by 2020, even without any of the developments going ahead.**

In conclusion with all the other problems like the school not being built and that the development of the second Phase would pay for the new school to get the next round of planning So, there will eventually be 600 houses in total.

The encroachment on the church of the development is unacceptable damage to building of significance.

The extra traffic is putting the listed red brick wall at permanent risk.

The development does not keep inline with the village envelope by going to far past the nursing home on Barham church lane.

This will create more rat runs through the village putting lives at risk especially children going to and from school.

The loss of grade 2 farming land.

The councillors kindly agreed to visit site at the last meeting, what are their thoughts on the site, its historical and natural importance and its suitability and sustainability?

I am sure that the councillors reviewing this situation can see this will do nothing to benefit the village apart from line the pockets land promotors, land owners and developers, and once they have all filled their pockets we will be left dealing with traffic jams, **impossible deteriorating roads and single lanes, Claydon Church lane, Barham Church lane, Coopers Road, Mill Lane, Bulls road, Bells Cross Road, Clay Lane,** overcrowded schools, no new GP services, this will no longer be a happy, quite village.

We understand that the council has kindly agreed to review this evidence which has now come to light with the highways department. How can the councils view be that there is no impact??????

THIS IS NOT SUSTAINABLE!

From: Melanie Thurston <barhampc@outlook.com>

Sent: 30 September 2020 09:10

To: Jo Hobbs <Jo.Hobbs@babberghmidsuffolk.gov.uk>; Philip Isbell

<Philip.Isbell@babberghmidsuffolk.gov.uk>

Subject: Land North West of Church Lane, Barham (Planning Application Number 1856/17)

Dear Jo and Philip

Please find attached the updated review of the Transport and Access report which we have had had carried out on behalf of Barham Parish Council, in relation to the above proposed planning application.

Kind Regards

Melanie Thurston
Clerk to Barham PC

Sent from [Mail](#) for Windows 10

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX
Email address: amanda.lyes@suffolk.nhs.uk
Telephone Number – 01473 770000

Your Ref: DC/18/00861/
Our Ref: IESCCG/SCDC/18/00861/AL

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

12 March 2018

Dear Sirs,

**Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.
Land To The East Of, Ely Road, Claydon, 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 and East Suffolk Clinical Commissioning Group (CCG) incorporating NHS England Midlands and East (East) (NHS England).

Background

2. The proposal comprises a development of up to 74 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. Ipswich and East Suffolk 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 is 1 branch surgery within a 2km radius of the proposed development. This GP practice does not have sufficient capacity for the additional growth resulting from this development and known 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 Impact Assessment

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
5. 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 and range of services within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment or extension, 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 reconfigure or extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of 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.
10. Ipswich and East Suffolk CCG is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Suffolk Coastal District Council.

Ipswich and East Suffolk CCG and NHS England 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

Amanda Lyes

Chief Corporate Services Office

Ipswich and East Suffolk Clinical Commissioning Group



**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/18/00861

Our Ref: IESCCG/000219/CLA

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

19/02/2019

Dear Sirs,

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Location: Land To The East Of, Ely Road, Claydon, 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 NHS England Midlands and East (East) (NHSE), incorporating Ipswich & East Suffolk Clinical Commissioning Group (CCG).

Background

2. The proposal comprises a development of up to 73 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. NHS England 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 is 1 GP practices 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 Impact Assessment

- The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
- 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
The Barham & Claydon Surgery	2,922	169.00	2,465	-31
Total	2,922	169.00	2,465	-31

Notes:

- 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.
 - Current Net Internal Area occupied by the Practice.
 - 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"
 - Based on existing weighted list size.
- 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 Barham & Claydon Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
 - 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

- 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.
- Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.
- NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully

Chris Crisell

Estates Planning Support Officer

Ipswich and East Suffolk Clinical Commissioning Group

Date: 13 February 2019
Our ref: 272939
Your ref: DC/18/00861



Jo Hobbs
Mid Suffolk Council
planninggreen@baberghmidsuffolk.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
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CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Ms Hobbs

Planning consultation: Outline Planning Application (with means of access to be considered) -
Erection of upto 73 dwellings, public open space and supporting site infrastructure including access.
Location: Land To The East Of, Ely Road, Claydon, Suffolk.

Thank you for your consultation on the above dated 06 February 2019 which was received by Natural England on 06 February 2019

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

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

Habitats Regulations Assessment - Recreational Impacts on European Sites

This development falls within the 13 km 'zone of influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'). It is anticipated that new housing development in this area is 'likely to have a significant effect', when considered either alone or in combination, upon the interest features of European Sites due to the risk of increased recreational pressure caused by that development.

As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development whilst ensuring that the delivery of the RAMS remains viable. If this does not occur in the interim period then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMS is adequately funded. We therefore advise that you should not grant permission until such time as the implementation of this measure has been secured.

Notwithstanding this, Natural England's advice is that this proposed development, and the application of these measures to avoid or reduce the likely harmful effects from it, may need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment in view of the [European Site's conservation objectives](#) and in accordance with the Conservation of Habitats & Species Regulations 2017.

This is because Natural England notes that the recent [People Over Wind Ruling](#) by the Court of Justice of the European Union concluded that, when interpreting article 6(3) of the Habitats

Directive, it is not appropriate when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site. The ruling also concluded that such measures can, however, be considered during an appropriate assessment to determine whether a plan or project will have an adverse effect on the integrity of the European site. Your Authority should have regard to this and may wish to seek its own legal advice to fully understand the implications of this ruling in this context.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of this ruling. In accordance with the Conservation of Habitats & Species Regulations 2017, Natural England must be consulted on any appropriate assessment your Authority may decide to make.

Sites of Special Scientific Interest Impact Risk Zones

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

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

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

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Alice Watson
Consultations Team

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.

Protected Species

Natural England has produced [standing advice](#)¹ 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.

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:

- 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

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

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.

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](#).

Date: 16 March 2018
Our ref: 240481
Your ref: DC/18/00861



Gemma Pannell
Mid Suffolk District Council
planninggreen@babberghmidsuffolk.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Gemma Pannell

Planning consultation: Outline Planning Application (with means of access to be considered) -
Erection of upto 74 dwellings, public open space and supporting site infrastructure including access.
Location: Land To The East Of, Ely Road, Claydon, Suffolk

Thank you for your consultation on the above dated 01 March 2018 which was received by Natural England on 01 March 2018

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

The Wildlife and Countryside Act 1981 (as amended)
The Conservation of Habitats and Species Regulations 2017

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

Statutory nature conservation sites - Further information required:
Habitats Regulations Assessment - Recreational Impacts on European Sites

This development falls within the 13 km 'zone of influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). It is anticipated that new housing development in this area is 'likely to have a significant effect' upon the interest features of the aforementioned designated site(s), when considered in combination, through increased recreational pressure. As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development to enable you to reach a conclusion of "no likely significant effect" whilst ensuring that the delivery of the RAMS remains viable. If this does not occur in the interim period then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMS is adequately funded. We therefore advise that you should not grant permission until such time as this mitigation measure has been secured.

Providing appropriate mitigation is secured to avoid impacts upon the European site(s) occurring there should be no additional impacts upon the SSSI interest features of Orwell Estuary and Little Blakenham Pit SSSIs.

Protected species

We have not assessed this application and associated documents for impacts on protected species. Natural England has published [Standing Advice](#) on protected species. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

Local sites

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

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

Sites of Special Scientific Interest Impact Risk Zones

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

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

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely
Hannah Bottomley
Consultations Team

Gemma Pannell
Planning Department
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

20/03/2018

Dear Gemma,

RE: DC/18/00861 Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access. Land to the East of Ely Road, Claydon

Thank you for sending us details of this application. We have read the ecological survey report (Geosphere Environmental, Jan 2018) and have the following comments on this proposal:

UK Priority Habitats

The site is crossed by a hedgerow, hedgerows are a UK Priority habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). Whilst the ecological survey report recommends that this hedgerow is retained, the Indicative Layout Plan (3484.05G) appears to show part of the hedgerow lost and the remaining part used to form the boundary between properties. Whilst we acknowledge that this is an Outline planning application, as proposed the level of development appears likely to result in the loss of this hedgerow. Loss of Priority habitats is contrary to the requirements of the National Planning Policy Framework (NPPF) and Mid Suffolk District Council's adopted Core Strategy policy CS5.

The site is also bounded on the eastern side by The Slade, this area includes deciduous woodland which is also a UK Priority habitat. Whilst this habitat is outside of the application site, it does form its eastern boundary. It is therefore important that this area is protected and suitably buffered from any development.

Protected and UK Priority Species

Bats

As identified in the ecological survey report, the site contains habitat suitable for roosting, commuting and foraging bats. The report goes on to state that if these habitats are retained then no further ecological survey or assessment is required, however from the drawings provided it appears that there will be some loss of these habitats (particularly hedgerow) and also the woodland on the eastern side of the site will not be buffered from the proposed development. We therefore consider that there is currently insufficient information available to be able to determine the likely impacts of the proposed development on bats.

Also, from the information available it is unclear what level of lighting will be required on the site. Insensitively designed lighting can have significant adverse impacts on biodiversity. It must therefore be ensured that any development in this location includes a lighting strategy which protects wildlife, particularly by ensuring that there is no lighting of habitat features such as woodland and hedgerows.

Great Crested Newts and Reptiles

The ecological survey report identifies that the site provides some suitable habitat for both great crested newts and reptiles, particularly along the hedgerows and in the areas of poor semi-improved grassland in the field margins. From the drawings provided it appears that a number of these areas will either be lost or fragmented by the proposal. We therefore consider that there is currently insufficient information available to be able to determine the likely impacts of the proposed development on great crested newts and reptiles.

Badgers

The ecological survey recorded evidence of badgers on site but did not find any evidence of sett building. However, suitable habitat for sett building is present immediately to the north-east of the site within the pit area. Mitigation measures for this species will therefore be required should it be determined that some development in this location is acceptable.

Greenspace

Whilst we acknowledge that this application is for Outline planning consent, from the Indicative Layout Plan (3484.05G) provided it appears that the potential development layout only includes a small amount of greenspace in the centre of the site. In order to mitigate for some of the impacts identified above it appears that a greater area of greenspace is required, particularly bordering the existing hedgerows and woodland. Consideration should therefore be given to reducing the number of dwellings proposed on the site to enable a greater proportion of greenspace to be delivered.

Habitats Regulations Assessment

The application site is within 13km of the Stour and Orwell Estuaries Special Protection Area (SPA). Work along the Suffolk coast has identified that new developments within this distance of such designated sites have the potential result in adverse impacts on these sites. This application must therefore be subject to a Habitats Regulations Assessment (HRA) to assess the likely impacts that will result from it. In particular, consideration must be given to the level of contribution required under the emerging Recreational Disturbance Avoidance Mitigation Strategy (RAMS).

Ecological Enhancements

Notwithstanding the above, the proposed development offers the opportunity to secure a range of ecological enhancement measures within its design. In addition to the measures identified in the ecological survey report (section 6.3), new buildings can also include integrated nesting opportunities for swifts. We recommend that, should it be determined that some development in this location is acceptable, an ecological enhancement plan is secured for the site detailing all of the ecological mitigation measures which will be implemented.

Conclusion

As set out above, we consider that as currently presented this application fails to demonstrate that the proposed development will not result in an adverse impact on UK Priority habitats and protected and/or UK Priority species. We therefore **object** to this application.

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

Yours sincerely

Jill Crighton
Conservation Planner

Consulting the Environment Agency

On Planning Consultations

October 2015

This form is designed to be completed by a Local Planning Authority and sent to the Environment Agency with a planning application or pre-application enquiry. The form should be used to explain why we are being consulted.

We will only respond to consultations that fall into one or more of the categories on this form.

Pre-application and planning application consultations

Category	Description	Reason for consulting EA
Cemeteries	Development relating to using land as a cemetery, including extensions.	<input type="checkbox"/>
Coastal erosion	Development (excluding minor development) located within Coastal Change Management Areas, as defined by the LPA.	<input type="checkbox"/>
Environmental Impact Assessment (EIA)	Development requiring an EIA, including scoping opinions and the environmental statement.	<input type="checkbox"/>
Flood risk	Development, other than minor development or as defined in our FRSA , which is carried out on land: <ul style="list-style-type: none"> • within Flood Zone 2 or 3, or • in an area within Flood Zone 1 which has critical drainage problems as notified by the Environment Agency. 	<input type="checkbox"/>
Groundwater protection	Potentially contaminating development ^{1 2} located in Source Protection Zones.	<input type="checkbox"/>
Hazardous waste/Control of Major Accident Hazard Regulations (COMAH) Sites	Development: <ul style="list-style-type: none"> • of new establishments, or • modifications to existing establishments which could have significant repercussions on major accident hazards, or • within 250 metres, where the siting or development would increase the risk or consequences of a major accident. 	<input type="checkbox"/>
Intensive farming	Development of intensive animal farming (such as pig or poultry) that may require an Environmental Permit ³ .	<input type="checkbox"/>
Pollution from land contamination	Development on land where a previous use ¹ of the site may have caused contamination.	<input type="checkbox"/>
Mineral Extraction	Development involving or including mineral and mining operations and restoration schemes relating to such development.	<input type="checkbox"/>
Oil and fuels	Development for the purpose of refining or storing non-domestic oils and their by-products.	<input type="checkbox"/>

Refuse or waste	Development that includes: <ul style="list-style-type: none"> the storage or spreading of sludge or slurry, or the storage, transfer, process, treatment and / or use of refuse or waste. 	<input type="checkbox"/>
Non-mains drainage	Major development proposing to use non-mains foul drainage.	<input type="checkbox"/>
Works affecting a watercourse	Development involving carrying out works or operations in the bed of or within 20 metres (or other distance as advised by your local Environment Agency Area Sustainable Places team) of the top of the bank of a Main River.	<input type="checkbox"/>
Discharge / variations of Conditions	Only consultations where the Environment Agency has requested the condition be attached to the planning permission.	<input type="checkbox"/>
Planning appeals –	Only appeals related to an Environment Agency objection or recommended condition.	<input type="checkbox"/>

Endnotes -

¹ - As defined on gov.uk, [Land contamination DoE industry Profiles](#)

² - This type of development also includes the storage of potentially contaminating substances as defined in DoE industry profiles

³ - An environmental permit is required for the development of or expanding of, an existing facility with more than 750 sows or 2,000 production pigs over 30kg or 40,000 poultry



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00026911
Local Planning Authority:	Babergh District
Site:	Ely Road, Barham
Proposal:	Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.
Planning Application:	DC/18/00861

Prepared by: Pre-Development Team

Date: 20 March 2018

If you would like to discuss any of the points in this document please contact me on 0345 606 6087 or email planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 2.1 The foul drainage from this development is in the catchment of Ipswich Cliff Quay Raeburn Street Water Recycling Centre that will have available capacity for these flows

Section 3 – Foul Sewerage Network

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

Section 4 – Surface Water Disposal

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).

We request a condition requiring a drainage strategy covering the issue(s) to be agreed.

Section 5 – Trade Effluent

- 5.1 Not applicable

Section 6 – Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

Surface Water Disposal (Section 4)

CONDITION

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy so approved unless otherwise agreed in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

FOR THE ATTENTION OF THE APPLICANT:

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)

Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
 - Development hectare size
 - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield run off rate on the following HR Wallingford website - <http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation>. For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)
 - Connecting manhole discharge location

- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)

Your Ref: DC/18/00861
Our Ref: 570\CON\0843\18
Date: 21st March 2018



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

Email: planningadmin@babberghmidsuffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the Attention of: Gemma Pannell

Dear Gemma

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN DC/18/00861

PROPOSAL: Outline Planning Application (with means of access to be considered) -
Erection of up to 74 dwellings, public open space and supporting site
infrastructure including access.

LOCATION: Land east of, Ely Road, Claydon, Ipswich, IP6 0BT

ROAD CLASS:

Notice is hereby given that the County Council as the local highway authority does not object to the proposal subject to the imposition of the conditions shown below on any permission to be granted and the completion of a S106 planning obligation to its satisfaction:

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:

1 ER 1

Condition: 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.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

2 ER 2

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

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

3 HGV – CONSTRUCTION CONDITIONS

Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- i) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- k) Details of deliveries times to the site during construction phase

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

4 P 2

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

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

5 B2

Condition: Before the development is commenced 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 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.

6 TRAVEL PLAN

Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP) as identified in the Transport Statement (dated February 2018). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised travel planning and a multi-modal travel voucher.

Reason: In the interests of sustainable development as set out in the NPPF, and policies SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012)

NOTE - SCC can design and produce a travel pack on behalf of the applicant provided that a suitable Section 106 contribution can be agreed.

7 PROW

Condition: The definitive line of the public footpath must be physically marked out on site at the start of the development, and remain open, unobstructed and undisturbed for as much of the construction phase as possible. If crossed by construction traffic, then that crossing point must be maintained in a good state of repair and be safe and fit for use at all times.

Reason: In the interests of the amenity of the public.

8 NOTE 01

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. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. For further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>

9 NOTE 07

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.

10 NOTE 12

The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council in order to agree any necessary alterations/additions to be carried out at the expense of the developer.

SECTION 106 REQUIREMENTS

Public Transport

There is a desire to upgrade the existing bus stops on Thornhill Road which will benefit residents and visitors to the site. Real time passenger information display screen is requested at a cost of £13,000 for installation.

Travel Plan

On reviewing the Transport Statement (dated February 2018) the proposed Travel Pack that was mentioned in paragraph 4.14 would be suitable to provide some highway mitigation for a residential development of 74 dwellings in accordance with paragraphs 32, 34, 35 and 36 of the NPPF. To secure the Travel Pack the condition 6, as shown above (with justification) will be required.

Public Rights Of Way

The proposed development will have a direct impact on the local public rights of way (PROW) network. They are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism.

The anticipated increased use of the PROW network as a result of the development will require the offsite improvement works by resurfacing and widening of Barham Bridleway 009, Claydon FP13 & FP14 (approx. 750m length) therefore total s106 funding requested from this development, will be a total of £58,125.00.

Yours sincerely,

Sam Harvey
Senior Development Management Engineer
Strategic Development

From:Sam Harvey
Sent:11 Apr 2018 12:29:06 +0100
To:Gemma Pannell;BMSDC Planning Mailbox
Subject:18/00861 Land East of Ely Road, Claydon

Hello Gemma

The access arrangements into the site shown on the drawing received 29/04/18 are acceptable.

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, Suffolk

IP1 2BX

Email sam.harvey@suffolk.gov.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: Jo Hobbs

Dear Jo

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN:**

PROPOSAL: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

LOCATION: Land east of, Ely Road, Claydon, Ipswich, IP6 0BT

ROAD CLASS:

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

Following the decision from the Planning Committee to defer the application to the Referrals Committee to consider the cumulative impact on highways from the proposed developments in the area. Suffolk County Council (SCC) carried out an analysis of the application's Transport Assessments on the following sites:

- 1856/17 – Land off Norwich Road, Barham
- 18/00861 - Land east of Ely Road, Claydon
- 18/00233 – Land to East of The Street, Bramford
- 18/02010 – Land East Side of Bramford Road, Sproughton

The data indicates there are significant delays at a number of junctions in Claydon and Sproughton and all applicants were asked to enter into a cooperative approach to consider any mitigation measures.

Following analysis of TAs to determine cumulative impact and various meetings with the planners and the applicants, it was decided that the sites in Claydon and Barham do not give significant impacts on the junctions in Bramford/Sproughton, nor Bramford and Sproughton Sites have impact on Claydon/Barham junctions.

Further analysis of the Barham and Claydon TAs showed the east of Ely Road application the predicted queue lengths on Station Road and Church Lane were 1 vehicle or below during the peak hour periods.

Therefore, we do not consider any mitigation is required from this development.

Taking all the above into account, it is our opinion that this development would not have a severe impact (NPPF para 109) therefore we do not object to the proposal and advise the conditions and contributions previously given in our response dated 21st March 2018.



Public Rights Of Way Improvements

The proposed development will have an impact on the local public rights of way (PROW) network. They are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism. The above plan shows the footpaths and bridleway that require improvements and we are requesting s106 funding for widening and resurfacing costing £58,125.00.

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: Jo Hobbs

Dear Jo,

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION REF: DC/18/00861

PROPOSAL: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

LOCATION: Land To The East Of, Ely Road, Claydon, Suffolk

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

We have reviewed the data supplied with this application, the summary of our findings are as follows:

- The proposal for 73 dwellings would create approximately 43 vehicle movements within the peak hour (1.3 vehicles every minute) therefore the additional vehicles from the development will not affect the capacity of the highway network in the area.
- There are bus stops within 200m of the site with good public transport services
- The catchment primary school is approximately 650m from the site. The mitigation measures for footway improvements between the site and the primary school to create a safer route for the vulnerable user.
- the proposed mitigation measures to be funded by this and Norwich Road, Claydon application will provide highway improvements for cyclists and pedestrians in Claydon Village.
-

The development would not have a severe impact on the highway network (NPPF para 109) therefore we do not object to the proposal.

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:

AL10 - Condition: Before the development is commenced, details of the access and associated works, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

D 2 - Condition: 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.

Reason: To prevent hazards caused by flowing water or ice on the highway.

ER 1 - Condition: Prior to commencement of any works, (save for site clearance and technical investigations) 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.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

ER 2 - Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority in consultation with Local Highway Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points and secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be in accordance with Suffolk Parking Guidance 2015 and carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

HGV CONSTRUCTION - 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:

- 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

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.

B 2 - Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored or presented on the highway causing obstruction and dangers for other users.

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.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

S106 CONTRIBUTIONS

Public Transport

There is a desire to upgrade the existing bus stops on Thornhill Road which will benefit residents and visitors to the site. Real time passenger information display screen is requested at a cost of £13,000 for installation.

Travel Plan

On reviewing the Transport Statement (dated February 2018) the proposed Travel Pack that was mentioned in paragraph 4.14 would be suitable to provide some highway mitigation for a residential development of 74 dwellings in accordance with paragraphs 32, 34, 35 and 36 of the NPPF. To secure the Travel Pack the condition 6, as shown above (with justification) will be required.

Public Rights Of Way

The proposed development will have a direct impact on the local public rights of way (PROW) network. They are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism.

The anticipated increased use of the PROW network as a result of the development will require the offsite improvement works by resurfacing and widening of Barham Bridleway 009, Claydon FP13 & FP14 (approx. 750m length) therefore total s106 funding requested from this development, will be a total of £58,125.00.

Village Highway Mitigation Measures

The package of measures include:

Station Road / Norwich Road Junction and footway improvements

Church Lane / Norwich Road Junction and footway improvements

Village Wide Cycle Infrastructure Improvement Works

Norwich Road extension of Speed Limit on Norwich Road

The total cost of these works are estimated at £98,250 to be apportioned between this and Norwich Road application.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Your ref: DC/18/00861
Our ref: Claydon – land to the east of Ely Road
00052360
Date: 12 March 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Ms Gemma Pannell,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Gemma,

Claydon: land to the east of Ely Road – developer contributions

I refer to the proposal: outline planning application (with means of access to be considered) – erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

A planning obligation or planning conditions will cover site specific mitigation.

The County Council recognises that the District currently do not have a 5-year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is seen as the golden thread running through plan-making and decision-taking.

Whilst some of the infrastructure requirements will be covered under Mid Suffolk District Council's Regulation 123 list of the CIL charging schedule it is nonetheless the Government's intention that all development must be sustainable as set out in the National Planning Policy Framework (NPPF). On this basis the County Council sets out below the infrastructure implications with costs, if planning permission is granted and implemented.

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

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

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

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

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

Community Infrastructure Levy

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

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

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

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

This consultation response mainly deals with the need to address primary school mitigation directly arising from the cumulative impacts of developer-led housing growth in the locality. The County Council's view is that appropriate mitigation should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances, in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

Ideally, the County Council would like to see a plan-led approach to housing growth in the locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including primary school provision. To not consider and address the cumulative impacts of growth will result in a sub-optimal outcome for education provision in the Claydon locality – this would be contrary to the principles of delivering

sustainable development, which is the golden thread running through the NPPF. There are numerous 'hooks' within the NPPF which support the County Council's position.

The District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April 2017) – with an initial consideration by the District's planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

In paragraph 187 of the NPPF it states *“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”* The County Council's positive solution to addressing the unacceptable impacts of the proposed development on education infrastructure is to secure a planning obligation to mitigate the harm arising in respect of early years and primary education provision.

And in paragraph 17 of the NPPF it states *“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking.”* One of these 12 principles say that planning should *“take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”* The strategy of delivering a new primary school in the locality to meet local needs ensures that housing growth, including this proposed development, is sustainable in respect of the NPPF and local plan policies.

The current planning application in Barham & Claydon under reference 1856/17 being promoted by Pigeon Investment Management is for outline consent for up to 300 homes and includes a reserved site for a new pre-school and a new primary school. This position reflects the strategic requirement for a new primary school in the locality.

Schemes in the locality currently on our radar include:

- a) Reference DC/18/00233/OUT – application in Bramford for 225 dwellings.
- b) Reference 1856/17 – application on land off Norwich Road at Barham & Claydon for 300 dwellings.
- c) Reference 1832/17 – scheme for 315 dwellings in Claydon. Recently refused but may go to appeal.
- d) Reference DC/17/04720 – this scheme in Claydon for 74 dwellings.
- e) Great Blakenham – Blakenham Fields scheme – approved scheme of 426 dwellings currently being built out by Bellway Homes.
- f) Great Blakenham, land west of Stowmarket Road – approved scheme of 130 dwellings.
- g) Great Blakenham, Kingfisher Drive – approved scheme for 10 dwellings.
- h) Bramford, Paper Mill Lane – approved scheme of 176 dwellings.
- i) Bramford, land east of The Street – approved scheme of 130 dwellings.

- j) Bramford, Clarice House – pre-application enquiry under references 3520/16 & IP/16/00096/PREAPP for 122 dwellings.
- k) Refer to the SHELAA.
- l) The above gives a cumulative total of at least 1,908 dwellings in the locality. Based on our standard methodology of 25 primary-age pupils for every 100 dwellings that generates the need for a 420-place primary school.

The details of the impact on local infrastructure serving the development is set out below and, apart from the proportionate developer contributions towards the land & build costs of a new primary school, will form the basis of a future CIL bid for funding:

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

The NPPF at paragraph 38 states ‘For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.’

SCC anticipates the following minimum pupil yields from a development of 74 dwellings, namely:

- a) Primary school age range, 5-11: 17 pupils. Proportionate contribution towards land and build costs of a new primary school.
- b) Secondary school age range, 11-16: 12 pupils. Cost per place is £18,355 (2017/18 costs).
- c) Secondary school age range, 16+: 3 pupils. Costs per place is £19,907 (2017/18 costs).

The local catchment schools are Claydon Primary School, Claydon High School, and One.

Based on existing forecasts SCC will have no surplus places available at the catchment secondary schools for which CIL funding of at least £279,981 (2017/18 costs) will be sought.

At the primary school level, the current thinking is the emerging need for a new primary school in the locality taking into consideration housing growth. This need will become clearer when overall housing numbers and likely locations are identified by the District. Ideally this would be identified in a plan-led approach but at present there is a large amount of developer-led growth.

Due to the current uncertainty over the scale, location and distribution of housing growth in the locality it is not clear at this point in time what the most sustainable approach for primary school provision is, but nonetheless:

- a) The current Claydon Primary School is forecast to be at capacity taking into account pupils arising from basic need and those arising from schemes with planning permission.
- b) Whichever strategy is the most appropriate a site of a minimum size of 2 hectares will need to be identified and secured – refer to application reference 1856/17. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
- c) Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 17 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school.
- $\text{£6.9m}/420\text{places} = \text{£}16,429$ per pupil place.
- From 74 dwellings it is forecast that 17 primary age pupils will arise.
- Therefore $17\text{ pupils} \times \text{£}16,429\text{ per place} = \text{£}279,293$ (2017/18 costs).

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £494,200 for a 2-hectare site and equates to £1,177 per pupil place. For the proposed development, this equates to a proportionate land contribution of $17\text{ places} \times \text{£}1,177\text{ per place} = \text{£}20,009$.

Use of the developer contributions – to be used towards the site acquisition and build costs of a new primary school in the locality to serve the new pupils of the proposed development. The developer contributions will be secured for a period of up to 10 years and returned if not spent. A clause included in the planning obligation that will enable the full developer contributions to fall away and/or to be returned if the Joint Local Plan is adopted without the identified need for a new primary school in Claydon, Barham, Great Blakenham or Bramford to serve the proposed development. A clause included in the planning obligation that will enable the full or a relative proportion of developer contributions to fall away, or be returned in full, if in the interim the existing Claydon Primary School is expanded up to 630 places (three forms of entry).

2. **Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 30 hours per week of free provision over 38 weeks of the year for all 3 and 4-year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2-year olds. From these development proposals SCC would anticipate up to 8 pre-school children arising.

This proposed development is in the Claydon & Barham ward, where there is an existing surplus of 99 places.

3. **Play space provision.** Consideration will need to be given to adequate play space provision. 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 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the 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 Sam Harvey will coordinate this.

A planning obligation or planning conditions will cover site specific matters.

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.

5. **Libraries.** 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 i.e. £15,984, 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 $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

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

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

7. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, SCC 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 local planning authority's housing team to identify local housing needs.
8. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

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

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

The changes set out in the MWS took effect from 06 April 2015. 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 fire-fighting which will allow SCC to make final consultations at the planning stage.
10. **Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. 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 from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

12. The above information is time-limited for 6 months only from the date of this letter.

If the District resolve to grant planning permission subject to the prior completion of a planning obligation based on the above terms to mitigate the harm on local primary education provision, then any objections the County Council has to the proposed development in respect of primary education provision will fall away as adequate mitigation will be secured.

Yours sincerely,

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

cc Carol Barber, Suffolk County Council
Sam Harvey, Suffolk County Council
Floods Planning, Suffolk County Council

Your ref: DC/18/00861
 Our ref: Claydon – land to the east of Ely Road
 52360
 Date: 06 August 2020
 Enquiries: Neil McManus
 Tel: 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk

Jo Hobbs,
 Growth & Sustainable Planning,
 Mid Suffolk District Council,
 Endeavour House,
 8 Russell Road,
 Ipswich,
 Suffolk,
 IP1 2BX

Dear Jo,

Claydon: land to the east of Ely Road – developer contributions

I refer to the proposal: outline planning application (with means of access to be considered) – erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Reason(s) for update: previous advice, which was time-limited to six months, has now expired and the Department for Education have recently published new pupil scorecard costs.

New CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) came into force on 1 September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).

Updated summary of infrastructure requirements:

CIL	Education	
	- Secondary school expansion	£285,300
	- Sixth form expansion	£71,325
CIL	Libraries improvements & resources	£15,768
CIL	Waste disposal improvements	£8,030
S106	Education	
	- Primary school new build	£348,636
	- Primary school land cost	£20,009
S106	Highway improvements	£15,542
S106	Public rights of way	£58,125

1. Education.

The most recent scorecard is 2019 and the national average school new build cost per pupil for primary schools is £20,508 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national new build cost (£20,508/1.00) produces a total of £20,508 per pupil for new build of primary schools.

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 (£23,775/1.00) 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”*.

- Primary school new build cost is 17 pupils x £20,508 = £348,636 (S106)
- Primary school land cost is 17 pupils x £1,177 = £20,009 (S106)
- Secondary is 12 pupils x £23,775 = £285,300 (CIL)
- Sixth form is 3 pupils x £23,775 = £71,325 (CIL)

2. **Monitoring fee.** The new CIL Regs allow for the charging of monitoring fees. In this respect the county council charges £412 for each trigger point in a planning obligation, payable upon commencement.

3. The above information is time-limited for 6 months only from the date of this letter.

Yours sincerely,

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

From:RM Floods Planning
Sent:Mon, 5 Mar 2018 10:00:07 +0000
To:BMSDC Planning Area Team Green
Cc:Gemma Pannell
Subject:2018-03-05 JS Reply Land To The East Of, Ely Road, Claydon, Suffolk Ref DC/18/00861

Dear Gemma Pannell,

Subject: Land To The East Of, Ely Road, Claydon, Suffolk Ref DC/18/00861

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/00861.

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

- Trial Pit Soakage Tests trial pits 1 to 4, Trial Pit Log & location Plan
- Indicative Layout for 74 Dwellings Ref 3484.05G
- Flood Risk Assessment & Appendices Ref CCE/U261/FRA-03
- Site Location Plan

The applicant has demonstrate that they have two methods for the disposal of surface water a) infiltration b) discharge to a public surface water sewer. The proposed discharge to ground is an option, but the applicant would need to demonstrate that they can accommodate two stages of treatment rather than a direct discharge to the chalk/source protection zone (outer zone 2) before this option is utilised.

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

1. Concurrent with the first reserved matters applications a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;

- b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} 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;
2. The scheme shall be fully implemented as approved.

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

3. 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.

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

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

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

5. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:
- a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
- i. Temporary drainage systems
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan

Informatives

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

Kind Regards

Jason Skilton

Flood & Water Engineer, Flood & Water Management

Growth, Highways and Infrastructure

Suffolk County Council

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

Telephone: 01473 260411

Email: jason.skilton@suffolk.gov.uk

Website: www.suffolk.gov.uk

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

From: planninggreen@baberghmidsuffolk.gov.uk [mailto:planninggreen@baberghmidsuffolk.gov.uk]

Sent: 01 March 2018 09:46

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

Subject: MSDC Planning Consultation Request - DC/18/00861

Please find attached planning consultation request letter relating to planning application - DC/18/00861
- Land To The East Of, Ely Road, Claydon, 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.

From: Graham Gunby <graham.gunby@suffolk.gov.uk>
Sent: 07 February 2019 11:05
To: Jo Hobbs <Jo.Hobbs@babberghmidsuffolk.gov.uk>
Cc: Cameron Clow <Cameron.Clow@suffolk.gov.uk>
Subject: RE: Planning applications in Barham and Claydon

Hi Jo

I have looked at these applications within the context of both the Suffolk Minerals Core Strategy (MCS) Adopted 2008 and the Submission Draft Minerals & Waste Local Plan 2018 (SMWLP), which is now a material consideration. All of the sites are shown to be within Minerals Consultation Areas under the higher resolution SMWLP Minerals and Waste Safeguarding and Proposed Sites map. The corner of 1856/17 also clips the SMWLP safeguarding area for the Barham Quarry.

The closeness of these sites to existing housing precludes the quarrying of the underlying sand and gravel to a large extent although as sustainable alternative developers should use where possible the underlying sand and gravel in the construction of the sites. In addition 1856/17 should include any mitigation required to protect residents from the existing quarry and also not prejudice the development of the proposed extensions to the quarry (consideration in this instance should include potential noise, dust and visual impacts although may not be very significant. Further information can be found on the SCC website by following the link provided below. Look under previous consultations to find the Submission Draft SMWLP.

<https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/>

Regards

Graham Gunby

Development Manager
Growth, Highways & Infrastructure Directorate
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich
Suffolk IP1 2BX

Tel: 01473 26**4807**

E-mail: graham.gunby@suffolk.gov.uk

Website: www.suffolk.gov.uk

For more information about our minerals and waste planning service go to:
<http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/>

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: Faye Minter
Direct Line: 01284 741228
Email: faye.minter@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_00861
Date: 8th March 2018

For the Attention of Gemma Pannell

Dear Mr Isbell

**Planning Application DC/18/00861/OUT – Barham, Claydon, Land east of Ely Road,:
Archaeology**

This site has high archaeological potential. It is situated in a topographically favourable location for archaeological activity overlooking the River, and in an area of light, sandy soils which tended to attract early occupation. To the north, in a similar topographic location and soils, Prehistoric, Roman and Anglo-Saxon settlement has been identified and recently confirmed during archaeological investigations (BRH 016).

Although nothing has to date been recorded from this site itself it has never been the subject of either amateur or systematic archaeological investigation and there is high potential for previously unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.

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

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

In order to establish the archaeological potential of the site, both geophysical and metal detecting surveys will be required in the first instance. The survey results will be used to make a decision on the timing and extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as part of any planning application for this site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:
<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Faye Minter

Senior Archaeological Officer
Conservation Team

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

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

Enquiries to: James Rolfe
Direct Line: 01284 741225
Email: James.Rolfe@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_00861
Date: 12th February 2018

For the Attention of Jo Hobbs

Dear Mr Isbell

**Planning Application DC/18/00861/OUT – Barham, Claydon, Land east of Ely Road,:
Archaeology**

This site has high archaeological potential. It is situated in a topographically favourable location for archaeological activity overlooking the River, and in an area of light, sandy soils which tended to attract early occupation. To the north, in a similar topographic location and soils, Prehistoric, Roman and Anglo-Saxon settlement has been identified and recently confirmed during archaeological investigations (BRH 016). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

As recommended in our earlier advice metal detecting and geophysical surveys have taken place. Based upon the results of these surveys, 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 Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2018).

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 mitigation. In this case, an archaeological evaluation will be 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,

James Rolfe

Senior Archaeological Officer
Conservation Team



Phil Kemp
Design Out Crime Officer
Community Safety Unit
Bury St Edmunds Police Station
Suffolk Constabulary
Raingate Street, Bury St Edmunds, Suffolk, IP33 2AP
Tele: 01284 774141 Fax: 01284 774130
www.suffolk.police.uk

PLANNING APPLICATION: DC/18/00861 Outline Planning Application
PROPOSAL: Outline Planning Application for up to 74 residential dwellings
LOCATION: Land east of Ely Road, Claydon, Suffolk
APPLICANT: Mr Richard Clews, Strutt & Parker for Mr Rob Scott, M. Scott Properties Ltd,
PLANNING OFFICER: Mr Alex Scott

Dear Mr Alex Scott

Thank you for allowing me to comment on the above Outline Planning Application for up to 74 dwellings at land east of Ely Road, Claydon.

I take on board that this is an initial outline planning application and that further details will be forwarded by the developers at the Reserved Matters stage, along with any possible amendments. As a result I feel that at present I do not have the full level of detail I require to make in depth specific individual comments in relation to 'designing out crime' for this outline application.

With this in mind, I strongly recommend that the applicant applies for ADQ and Secure by Design accreditation for Homes 2016. **Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% to 75% and achieve ADQ.**

1.0 SITE SPECIFIC RECOMMENDATIONS

1.1 I have serious concerns regarding parking for the whole development, I realise that further details have yet to be supplied. From the plans offered so far, I would like to know how many garages will be incorporated and how many car ports. I note too that there will be at least two areas that will incorporate rear car parking by the north and to the south of new Ely Road access area as it comes in from the already established area of this road (pictured right). The police strongly discourage the sighting of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, anti-social behaviour and graffiti. As these areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties.



1.2 I hope the developers will reconsider and look at alternative areas for parking, where the vehicles will be observed from active windows within their respective properties and from neighbouring properties too. I would prefer it if as many lockable garages can be incorporated.

1.3 The police discourage the use of car ports, as they too do not provide security for parked vehicles. If car ports are to be implemented then I strongly recommend they are not designed to overhead undercroft standards as such designs not only hamper any form of surveillance they are more susceptible to Arson. These areas should allow for surveillance from active windows situated either at the front or to the side of the property, as well as from neighbouring properties and not set back, as is the case here. I also strongly recommend that photocell dusk to dawn lighting that meets BS5489:2013 lighting standards are placed on the side of buildings looking onto such areas and to provide some form of protection they are securely gated.

1.4 Further details recommending on parking can be found within “Secure By Design (SBD) New Homes 2016” section 1, at para 16 entitled “Car Parking”, para 16.1- 16.7, pages 22-23. Along with section 3 at para 52, also entitled “Car Parking”, para 52.1-52.2, pages 62-63.

1.5 I have concerns the number of foot paths envisaged will make the area too permeable for offenders to come and go and make the rear of properties on the south western and southern sides more vulnerable to crime (pictured right). I would prefer it if there was only one foot path,



linked to the new road system for the development. If the foot path on the south western side has to be incorporated I strongly recommend that the property pictured left, is repositioned 90 degrees to the east so that the front of the building will look onto this area and provide valuable surveillance.



1.6 I am also particularly concerned with the footpaths on the eastern side that flow past the sides of properties, making these too more vulnerable to crime (pictured right).



1.7 The northern side will be very open and allow offenders free reign. The southern side will back onto nearby playing fields. However, I am glad to see the eastern side will have ample vegetation and defensive vegetation such as blackthorn. I hope that there will be no substantial gaps within this planted area that would allow anyone access from the Slade to the rear of any of these properties, or allow anyone to make their own access points in order to create short cuts and further unauthorised paths.

1.8 Further details on the layout of foot paths can be found within “Secure By Design (SBD) New Homes 2016” section 1, at para 16 entitled “Layout of roads and footpaths”, para 8.1- 8.19, pages 14-17. Lighting for footpaths should meet BS5489:2013 standards.

1.9 I would like to know more about how the perimeters of all properties will be secured. I hope that the rear and side of all perimeters will comprise of at least 1.5m close boarded fencing, supplemented with 300cm trellis, or preferably 1.8m close boarded fencing. SBD New Homes 2016 “Dwelling Boundaries” refers at paras 10.1-10.8.4 refer, at pages 18-21.

1.10 I would like to know more with regard to bin storage and how all bins can be moved in order for waste collection.

1.11 I would like to know how the attenuation area on the south western side will be perimetered off. I trust it will be secured by either high defensive vegetation or secure fencing, so no one will be able to access this area.

1.12 I would like to have more details on how the whole of the development will be perimetered off, especially on the western side where it will border the current properties in situ? I would also like to know more regarding projected proposals for the undeveloped area to the south east that will border the playing fields (pictured right). Will this



footpath link up with the current footpath along Lancaster Way that leads out onto York Crescent?

- 1.13 I trust none of the properties will have recessed front doors, as they hinder the surveillance a house holder can obtain to observe who is at the front of their property.
- 1.14 I trust that all parking spaces will be within short distance from their respective properties.
- 1.15 I would like to have more details on how the rear gates will be positioned to allow householders to take out their bins and how the rear gates will comprise.
- 1.16 I note there will be a number of prominent gable end walls. I strongly recommend that as these areas are a focal point that they are perimetered off to prevent groups congregating, graffiti and ball games. The perimeter could either consist of hedge planting or picket fencing. SBD New Homes 2016 refers under "Gable End Walls" at para 12.1-12.2.2, page 21.
- 1.17 I trust there will be a management programme to maintain and keep in check the vegetation for the area.
- 1.18 I would like to know how the whole area will be lit. In particular I would like to know how the main focal perimeter footpaths will be lit.
- 1.19 I would also like to see 1 metre metal hooped railings around the communal areas.
- 1.20 Play equipment should be installed to meet BS EN 1176 standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to BS EN1177 standards.
- 1.21 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 1.22 All litter bins should be of a fire retardant material.
- 1.23 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.
- 1.24 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 1.25 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17).
- 1.26 Communal parking facilities should be lit to the relevant levels as recommended by BS5489:2013. See section 16 SBD Homes 2016 for the specific lighting requirements.

2.0 SECURE BY DESIGN (SBD)

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments

by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

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

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCO) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a 'fortress environment'.

It is worth noting that **Pre-build agreements** can also be applied for and if granted can be used in any marketing or promotion of the development. Application forms can be found on the Secured by Design website (www.securedbydesign.com).

Further information can be found at www.securedbydesign.com .

3.0 REFERRALS

3.11 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.

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

3.2 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

3.3 Department for Transport – Manual for Streets (Crime Prevention)

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police Architectural Liaison Officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways.

Safer Places highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*: also refer to Technical Advice Note (TAN 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
 - ideally be parked on the street in view of the home.
 - Where parking courts are used, they should be small and have natural surveillance;
 - layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

4.0 **CONCLUSION**

4.1 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.

4.2 **SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards it is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>**

4.3 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:

- a) All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
- b) All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
- c) Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, **or** STS204 issue 3:2012, **or** LPS1175 issue 7:2010 Security Rating 1, **or** LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible)

windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

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

4.4 As stated I am unable to fully comment in specific detail on this application, as I would require more in depth information from any forthcoming Reserved Matters application.

4.5 To reiterate, my main concerns are:

- a) To know how the parking for residents and visitors will be implemented, preferably without any rear parking. (including what garages and/or car ports/parking spaces will be incorporated).**
- b) To know how the plots will individually be laid out and in particular how the rear of properties will be developed, in order to avoid any alleyways and where rear gates will be sighted and how they will comprise.**
- c) To know more on the designs of each property, in order to be able to deduce what areas provide active surveillance for where.**
- d) To know more regarding the layout for foot and cycle paths and if they can be reduced in number and how much permeability will be incorporated with these pathways.**
- e) To know how the perimeter for the rear of all properties will be secured, along with sides of properties that border nominated footpath areas.**
- f) To know more about how the attenuation area will be secured.**
- g) To know more as to how gable end walls will be protected to prevent ball games and youths congregating in such places.**
- h) To know more about the play area how, it will comprise and what equipment will be sourced.**

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

Yours sincerely

Phil Kemp
Designing Out Crime Officer Western and Southern Areas
Suffolk Constabulary,
Raingate Street,
Bury St Edmunds,
Suffolk, IP33 2AP

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

Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.

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/F216223
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 20/03/2018

Dear Sirs

Land to the east of Ely Road, Claydon
Planning Application No: DC.18/00861

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

Suffolk Fire and Rescue 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/

OFFICIAL

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Enc: PDL1

Copy: Richard.clews@struttandparker.com

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: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 20 March 2018

Planning Ref: DC/18/00861

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land to the east of Ely Road, Claydon
DESCRIPTION: 74 Dwellings
NO: HYDRANTS POSSIBLY REQUIRED: Required

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

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

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

Mrs A Kempen
Water Officer



22 March 2018

Gemma Pannell
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear Gemma,

Thank you for requesting advice on this application from Place Services's 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/18/00861

Location: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Thank you for consulting Place Services on the above application.

Holding objection due to

- a) Insufficient information to enable the LPA to prepare a Habitats Regulation Assessment in relation to recreational disturbance on Natura 2000 sites.**
- b) Insufficient ecological information to provide certainty of impacts to protected species and priority species/habitat.**

The site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SSSI and SPA/Ramsar. Natural England's Impact Risk Zones require consultation on residential development within the 13 km ZOI specified to ensure mitigation for designated site impacts from recreational disturbance to be compliant with the Habitats Regulations 2017.

The LPA will need to prepare a project level HRA to assess potential impacts from the development (either alone or in combination with other plans and projects) and formulate any necessary mitigation measures. This is "typically a combination of 'on-site' informal open space provision and promotion (i.e. in and around the development site) and 'off-site' visitor access management measures (i.e. at the Natura 2K site)". A 2.6km daily walking route will need to be demonstrated and a proportionate financial contribution towards visitor management measures will need to be secured from the developer for in combination impacts in line with the emerging Recreational disturbance Avoidance and Mitigation Strategy (RAMS) for residential development within the 13 km ZOI specified.



This gap in ecological information for impacts on designated sites, Protected species, Priority habitats and species needs to be filled before determination of this application to enable the Local Planning Authority to demonstrate it has met its statutory duties for wildlife and biodiversity.

In addition, it is considered there is currently insufficient information to determine the impacts on bats, great crested newts and reptiles. This is because the Preliminary Ecological Appraisal (Geosphere Environmental Ltd, January 2018) highlights habitat features which potentially may be used by these species, but they are shown to be removed within the indicative site layout. As there are likely impacts, it is considered that an Ecological Impact Assessment is therefore required to support this proposal, with further surveys where appropriate and effective mitigation and compensation measures identified prior to determination.

It is recommended that an appropriate buffer to the adjacent broadleaved woodland (Priority habitat) is provided. This will reduce the potential impacts to these protected species, particularly bats. Any hedgerows which are proposed to be removed should be adequately compensated for within the development.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection.

Please contact me with any further queries.

Regards,

Hamish Jackson GradCIEEM BSc (Hons)

Junior Ecological Consultant

Place Services at Essex County Council

Hamish.Jackson@essex.gov.uk

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

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



18 October 2018

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

By email only

Dear Mark,

Thank you for requesting advice on this 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/18/00861

Location: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

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

Holding objection due to

- a) Insufficient information to enable the LPA to prepare a Habitats Regulation Assessment in relation to recreational disturbance on coastal Habitats Sites.**
- b) Insufficient details to ensure an appropriate buffer of the Mixed Lowland Deciduous Woodland**

We have reviewed the submitted documents provided by the applicant by Geosphere Environmental Ltd, relating to the likely impacts of development on Protected & Priority species / habitats. This includes the Preliminary Ecological Appraisal (January 2018), Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018).

The submitted documents provide sufficient information on Protected & Priority species subject to securing a European Protected Species Mitigation Licence for Great Crested Newts and mitigation and enhancement measures as a condition of any consent.

However, as highlighted in Place Services initial response (March 2018), the LPA needs to prepare a Habitat Regulations Assessment for this application, as the site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SPA & Ramsar.



This application falls within Annex 1 (larger scale residential developments) of Natural England's integrity test for HRA Stage 2: Appropriate Assessment¹. Therefore, Mid Suffolk District Council will need to prepare a HRA Appropriate Assessment to be approved by Natural England. This will assess potential impacts from the development (either alone or in combination with other plans and projects) to the Stour & Orwell Estuaries SPA & Ramsar and formulate any necessary mitigation measures which need to be delivered at the coastal Habitats Site.

To inform the necessary mitigation measures, the applicant must provide a map of a circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW) to the Local Planning Authority to demonstrate that adverse effects on site integrity from the development alone can be avoided. A proportionate financial contribution in line with the emerging Suffolk Coast RAMS will also need to be secured, towards visitor management measures at the coastal Habitats Sites. This will need to be provided prior to first commencement of house building, to avoid in combination impacts from other plans and projects.

In addition, we still need to ensure that a functional buffer zone to the Mixed Lowland Deciduous Woodland (Priority Habitat) is secured. The submitted Mitigation Strategy and Enhancement Plan highlights that a three to five metre buffer of rough grassland will be maintained around the site margins on the northern, eastern and southern boundaries of the site and a 10m construction exclusion zone will also be installed around a badger sett. These plans provide suitable recommendations to mitigate Protected and Priority species. However, they don't provide sufficient details that an appropriate buffer will be provided, to avoid negative impacts to the Mixed Lowland Deciduous Woodland.

These negative impacts are primarily caused when gardens are situated towards woodlands. This is because it can often cause increased garden waste dumping, which can result in non-native plant species encroaching on the woodland. It can also result in garden encroachment of individual properties towards the woodland and creation of personal household pathways into the woodland.

Therefore, to minimise these potential risks and ensure a functional buffer zone for Priority Habitat woodland, it is recommended that a revised layout plan should be submitted. This should show the positions of the houses on the eastern boundary facing towards the woodland with a road in between to increase the distance of the woodland. The rough grassland buffer should still be provided for Protected and Priority species (Gt Crested newts and reptiles) which should be retained within public ownership to ensure appropriate management.

If the above recommendations are not feasible then a revised layout plan at minimum should include the houses on the eastern boundary being set back the equivalent height of the mature trees on the eastern boundary. This measure will guarantee the future safety of the properties from potential falling trees. This boundary should be planted with scrub habitat to provide a barrier to the Priority Habitat woodland from garden waste dumping, while providing a suitable habitat for the highlighted Protected and Priority species.

¹ *In line with the recent Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a development is likely to result in significant effects on a Habitats Site. Therefore, all proposals which are within the scope of the emerging Suffolk Coast RAMS must proceed to HRA Stage 2 (Appropriate Assessment).*



Consequently, until the recommended additional information has been submitted for this application, we are unable to remove our holding objection to this application.

We look forward to working with the LPA and the applicant to overcome the above concerns.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)

Place Services at Essex County Council

Hamish.Jackson@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.



Annex I – Natural England’s recommendations for larger scale residential developments within the Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the Habitats Sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance [here](#) 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. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km² within the site and/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

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available [here](#).

However, the unique draw of the above Habitats Sites means that, even when well-designed, ‘on-site’ provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together ‘in combination’. We therefore advise that consideration of ‘off-site’ measures (i.e. in and around the relevant Habitats Sites) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases.

As such, in the interim period before the RAMS is adopted, a financial contribution should also be agreed with and collected from the developer, prior to commencement, on the basis that it can be used to fund strategic ‘off site’ measures (i.e. in and around the relevant Habitats Sites). These measures should be targeted towards increasing the relevant Habitats Sites resilience to recreational pressure and be in line with aspirations of the emerging RAMS. As an example in this interim period, this could include funding towards existing wardening schemes at the relevant Habitats Sites. A suitable delivery mechanism for the measures must be agreed to secure them and ensure they are implemented from the first occupation of dwellings. Alternatively, we understand that it may be acceptable at the outline planning stage to include a suitably-worded planning condition which secures full adherence with the emerging Suffolk Coast RAMS at the Reserved Matters stage.

Once the RAMS has been adopted, a financial contribution should be secured from these developments prior to commencement.

² Taken from Jenkinson, S., (2013), *Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*



20 February 2019

Jo Hobbs
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear Jo,

Thank you for requesting advice on this 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/18/00861

Location: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

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

No objection subject to conditions to secure:

- a) Mitigation towards visitor management measures at the Stour & Orwell Estuaries SPA & Ramsar site, from the development alone and in combination of other plans and projects;**
- b) ecological mitigation and enhancements.**

Summary

We have reviewed the submitted documents provided by the applicant by Geosphere Environmental Ltd, relating to the likely impacts of development on Protected & Priority species / habitats. This includes the Preliminary Ecological Appraisal (January 2018), Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018).

In addition, we have reviewed the map to demonstrate that a circular dog walking route of 2.7 km or more is present within links to surrounding public rights of way (PRoW), which was provided to enable the LPA to have sufficient information to prepare a Habitats Regulation Assessment for this application.

We have also reviewed the details to ensure an appropriate buffer to the Mixed Lowland Deciduous Woodland will be present for this proposed development.



After review of the submitted information, we are satisfied that there is sufficient ecological information available for determination of this application.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable. We support the reasonable biodiversity enhancements, which should also be secured by a condition of any consent.

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

The ecological mitigation and enhancement measures identified in Preliminary Ecological Appraisal (January 2018), Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018) should be secured and implemented. This is necessary to conserve Protected and Priority species.

As highlighted within Place Services previous ecological responses and Natural England's Consultation response (Ref: 272939, February 2019), this site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SPA & Ramsar site. Therefore, Mid Suffolk District Council will need to prepare a HRA Appropriate Assessment to be approved by Natural England. This is undertaken to avoid likely 'adverse impacts' to these coastal Habitats sites by securing mitigation measures for the development (either from the development alone or in combination with other plans and projects).

The developer has now provided sufficient information to support the provision of the Habitats Regulations Assessment by Mid Suffolk District Council and overcome Place Services initial holding objection. Therefore, mitigation measures included within the HRA will need to be agreed and secured by legal agreement prior to commencement, to ensure implementation of mitigation measures prior to occupation.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.



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

Reason: To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

2. CONCURRENT WITH RESERVED MATTERS: SUBMISSION OF A COPY OF THE EPS LICENCE FOR GREAT CRESTED NEWTS

"Works shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 authorizing the specified activity/development to go ahead; or*
- b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence."*

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 and s17 Crime & Disorder Act 1998.

3. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

"A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.

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."



Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

4. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

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

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

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Junior Ecological Consultant
Hamish.Jackson@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.



Natural England's recommendations for larger scale residential developments within the Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the Habitats Sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance [here](#) 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. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/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

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available [here](#).

However, the unique draw of the above Habitats Sites means that, even when well-designed, 'on-site' provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together 'in combination'. We therefore advise that consideration of 'off-site' measures (i.e. in and around the relevant Habitats Sites) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases.

As such, in the interim period before the RAMS is adopted, a financial contribution should also be agreed with and collected from the developer, prior to commencement, on the basis that it can be used to fund strategic 'off site' measures (i.e. in and around the relevant Habitats Sites). These measures should be targeted towards increasing the relevant Habitats Sites resilience to recreational pressure and be in line with aspirations of the emerging RAMS. As an example in this interim period, this could include funding towards existing wardening schemes at the relevant Habitats Sites. A suitable delivery mechanism for the measures must be agreed to secure them and ensure they are implemented from the first occupation of dwellings. Alternatively, we understand that it may be acceptable at the outline planning stage to include a suitably-worded planning condition which secures full adherence with the emerging Suffolk Coast RAMS at the Reserved Matters stage.

Once the RAMS has been adopted, a financial contribution should be secured from these developments prior to commencement.

¹ Taken from Jenkinson, S., (2013), *Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*



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

21/03/2018

For the attention of: Gemma Pannell

Ref: DC/18/00861 Land to the east of, Ely Road, Claydon, Suffolk

Thank you for consulting us on the outline application for the erection of up to 74 dwellings, public open space and supporting site infrastructure including access (with means of access to be considered).

This letter sets out our consultation response on the landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

Recommendations

The following points highlight our key recommendations for the submitted proposals:

- 1) The Landscape and Visual Impact Assessment (LVIA) refers to the views from the dwellings on the western boundary as 'highly sensitive', yet little is being proposed in terms of mitigation. Therefore, more information is required within the LVIA to address the relationship and mitigation between the proposed development site and surrounding buildings, in particular Hereford Drive. Specific scaled sections, which identify how the visual impact is mitigated would be useful to justify the analysis within the LVIA.
- 2) The LVIA fails to highlight the neighbouring current outline planning application (ref. 1856/17) for up to 300no. dwellings. Consequently, it also fails to provide any analysis of the cumulative impact that the development will have on the landscape and how the proposals will mitigate any negative visual effects of this both within and beyond the village settlement edge.
- 3) It would be advised that that the total dwelling numbers are reduced to allow for a landscape buffer on the northern and north eastern boundary. This would allow for further visual mitigation and landscape enhancements along the PRow and woodland parcel, which in turn will reduce the impact on the existing settlement boundary.
- 4) A landscape strategy needs to be produced to demonstrate what landscape principles will be applied to the proposal if the application is approved. The submitted landscape strategy should include the following sections:
 - a. Context and character
 - b. Landscape masterplan (Inc. visuals/perspectives)
 - c. Public open space
 - d. SUDs strategy
 - e. Boundary treatments (Inc. sections)
 - f. Hard landscape Strategy

g. Soft landscape (Trees and Shrubs) Strategy

- 5) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 5 years, to support plant establishment. SuDS features such as attenuation basins should also be built into the landscape management plan to ensure they maintain their functionality as well as aesthetic.
- 6) A detailed boundary treatment plan and specification will need to be submitted, if the application is approved.

The proposal

The application plan sets out the outline application for the erection of up to 74 dwellings, public open space and supporting site infrastructure including access (with means of access to be considered). The proposal site lies on the eastern edge of the village of Claydon, to the east of Ely road. The Site inhabits an area of approximately 3.5 hectares and currently comprises of two rectangular arable fields divided by a mature, native hedgerow running east to west, with a large hedgerow gap to the west where existing dwellings are situated.

Review on the submitted information

Relevant to this landscape review, the submitted application includes a Landscape and Visual Impact Assessment, Design and Access Statement and Indicative layout.

As part of the outline application submission the concept masterplan shows the areas designated for residential development and open space including an attenuation pond, which is located on the southern boundary of the site. The current layout fails to suitably demonstrate how an appropriate and connected drainage system responds to the layout. Therefore as the proposal develops, a greater level of detail will be required. This could include the use of swales on road verges or buffer zones, as well as rain gardens and other balancing ponds.

Considering the proposals location outside the current Claydon built envelop, and the cumulative impact this proposal and outline planning application (ref. 1856/17) would have on the character of the settlement, it would be advised that that the dwelling numbers are reduced where possible. This would also allow for further landscape mitigation on the northern and north eastern boundary, which would provide visual mitigation and landscape enhancements, which in turn will reduce the impact on the existing settlement built envelope.

The LVIA has been produced to the appropriate guidance with suitable viewpoints shown. However, the report suggests that “the greatest visual impact identified was upon users of Public Footpath E120 009/X” and “occupants of Winchester Gardens and Hereford Drive”, yet the proposed layout has not applied suitable mitigation methods to alleviate this. Currently, the indicative layout has proposed a small landscape buffer between Hereford Drive and the proposed development dwellings, but due to the sloping topography it is not felt that this will have any considerable mitigation benefit. Moreover, there is no landscape buffer between dwellings and the PRow on the northern boundary which would diminish the PRow user experience. Because of this, it is advised that more information is required within the LVIA to address the relationship and mitigation between the proposed development site and surrounding buildings and PRowS. Specific scaled sections, which identify how the visual impact is mitigated, would also be useful to justify the analysis within the LVIA.

It would also be recommended that more information is sort to understand the cumulative impact of this proposal and outline planning application (ref. 1856/17) on Claydon and how any negative visual impacts can be mitigated through this development site, therefore visual representations of the proposal sited within the landscape would help to visualise the degree the proposal affects the existing landscape.

The Design and Access statement only provides descriptive information on the landscape, and does not provide sufficient principles of how the landscape will be designed as the application develops. Therefore it would be suggested that a Landscape Strategy is provided, which looks at setting principles for landscape features and implies how the sites character and context is going to be

applied and enhanced. Suggested document sections should include; context and character, public open space, SUDs, boundary treatments (Inc. sections), hard landscape and soft landscape.

Likely impact on the surrounding landscape

The proposed development will inevitably have an impact on the existing built envelope of Claydon and therefore it is important that the existing landscape setting and character is protected, and where possible, enhanced. The Mid Suffolk Core Strategy picks up on this principle: "Objective SO 4: To protect, manage, enhance and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character." It is felt that even though the proposed development is enclosed by large woodland parcels, it is important to identify that the development will negatively impact on nearby dwellings and heritage assets. Therefore landscape enhancements should be at the forefront of the scheme. This should include the implementation of large landscape buffers and improvements to the villages overall green infrastructure, which in turn will help set a precedent for any future development.

The application site is located within the Rolling Estate Farmlands Landscape Character Area (LCA). The key characteristics of this LCA include gently sloping valley sides and plateau fringes, generally deep loamy soils, an organic pattern of fields modified by later realignment and important foci for early settlement. Due to the enclosure pattern in the area there is an expectation that landscape areas are enhanced, and estate features and woodland planting is safeguarded throughout the development of this proposal. This should be evidenced in the recommended landscape strategy.

Proposed mitigation

The indicative proposal shows an area of water attenuation and green open space on the south western edge of the proposed development. As part of this feature, there are opportunities to include areas of habitat creation with the introduction of an appropriate planting. This should be referred to in the proposed landscape strategy.

If approved, an appropriately detailed landscape and boundary plan will be required to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal, suitable to limit any negative visual effect the proposal may have on the existing settlements.

Please feel free to contact me with any queries, questions or clarifications.

Yours sincerely,

Ryan Mills LMLI BSc (Hons) MSc
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

13/02/2019

For the attention of: Jo Hobbs

Ref: DC/18/00861 Land to the east of, Ely Road, Claydon, Suffolk

Thank you for re-consulting us on the outline application for the erection of up to 73 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works (with some matters reserved).

This letter sets out our recommendations relating to the revised sketch layout (Dwg no. SK 01 Rev. H) and Landscape and Visual Impact Assessment (LVIA) (Document ref: 17-1199 rev. 7).

We welcome the changes that have been made to the sketch layout. Since we were last consulted the public open space (POS) has been amalgamated into one larger space, houses now provide passive surveillance onto POS and generally the arrangement responds to the existing settlement layout well.

The revised LVIA has sought to address the concerns relating to cumulative impact. The assessment is considered acceptable and has concluded that the only visual receptor likely to experience cumulative effects was the users of Public Footpath E120/009/X through a sequential experience of both developments. However, it's thought that by amending the layout there are more opportunities for landscape enhancements along this route. Whereas in terms of landscape, there is a slight adverse cumulative landscape effect upon the arable character of the Site and Claydon.

If minded for approval I recommend that the following landscape and design aspects are considered:

- 1) A landscape strategy has still not been produced. This should illustrate the landscape principles that will be adhered to as part of any future reserved matters application. This should include the following sections:
 - a. Context and character
 - b. Landscape Design strategy
 - c. Landscape masterplan (Inc. visuals/perspectives)
 - d. Public open space
 - e. SUDs strategy
 - f. Boundary treatments (Inc. sections)
 - g. Hard landscaping Strategy
 - h. Tree Strategy
 - i. Planting Strategy
- 2) SUDs should be explored in greater detail as there are many opportunities to include these as part of the streetscape and landscape design due to the sites topography. Assurance is also

needed that the indicative drainage pond area is sufficient for its purpose and is easily accessed for long term management.

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

1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING

Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other construction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

2. 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 for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

3. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING 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 and soft landscaping and boundary treatment 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 on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting. Tree pit details will also need to be provided for the different planting environments proposed i.e. planted in hard landscaping, close to road boundaries and within the public open space (POS).

4. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS

Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

If you have any queries regarding any of the matters raised above, please let me know

Yours sincerely,

Ryan Mills BSc (Hons) MSc CMLI
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.

From: David Pizzey
Sent: 02 March 2018 10:38
To: Gemma Pannell
Cc: BMSDC Planning Area Team Green
Subject: DC/18/00861 Land To The East Of, Ely Road, Claydon, Suffolk

Gemma

I have no objection in principle to this application as there appears to be little conflict between the development, based upon the indicative layout, and any significant trees/hedges on site. The accompanying Tree Survey provides a generally accurate appraisal of existing trees although a detailed Arboricultural Impact Assessment has not yet been undertaken to indicate any specific losses or areas requiring precautionary measures and/or mitigation. This should be provided as part of the application if a final layout design is available.

If you are minded to recommend approval we will also require other information including a detailed Arboricultural Method Statement and Tree Protection Plan in order to help ensure appropriate protection measures for trees scheduled for retention. Ideally this should be submitted as part of the application but can be dealt with under condition if necessary.

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 Application – Consultation Response

Planning Application Reference:	DC/18/00861
Site:	Land To The East Of Ely Road Claydon
Proposal:	Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	15/01/2020

1. Policy position

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA003.

2. Infrastructure Delivery Plan (IDP) position

The IDP (July 2019) sets out both Babergh and Mid Suffolk's infrastructure requirements and priorities. It was published on the 22nd July 2019 as evidence which supports the Joint Local Plan and is an iterative document which will change over time dependent on changing infrastructure capacity, requirements and priorities.

The application site is part of the proposed site allocations of the emerging Joint Local Plan, policy reference LA003. 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 permissions and responses from infrastructure providers.

Set out below are the current planning applications (over 10 dwellings) and emerging Joint Local Plan land allocations in Barham & Claydon:

Existing Permissions

- 0928/17 Land At Norwich Road, Barham – Full permission for 10 dwellings
- 0191/17 Land Rear Of De Saumarez Drive, Barham – Full permission for 23 dwellings
- 0085/17 Land Between Norwich Road And Pesthouse Lane, Barham – Outline permission for 20 dwellings
- 1832/17 Land To The West Of Old Norwich Road And To The East Of The A14 Claydon – Outline permission for 190 dwellings. Emerging Joint Local Plan allocation reference LA102, for 190 dwellings.

Planning applications awaiting determination (other than this application)

- 1856/17 Land Off Norwich Road Barham And Claydon – Outline application for 269 dwellings. Emerging Joint Local Plan allocation reference LA002, for 270 dwellings.

Other emerging Joint Local Plan site allocations

- LA001 - Land to the east of Norwich Road, Barham – 325 dwellings

There are several essential infrastructure needs for Barham & Claydon that are identified:

- Education

The IDP states that within Barham & Claydon a new pre school setting for 60 places is needed with proposed land allocation on LA002. A new primary school is also to be provided, also on site LA002, to supply growth of Claydon & Barham. This new primary school would have the potential to provide for this development together with the committed growth and other Joint Local Plan proposed allocations. For the secondary school provision, the expansion of Claydon High School from 818 to 900 places is planned, to provide for this development together with committed and planned growth of the Joint Local Plan.

- Transport

The IDP states that within Barham & Claydon, contributions towards the new footway links and bus stops would be required as well as highway mitigation measures. Specific site details and required contributions are provided through the County Council Highway response.

- Health

The local practice is the Barham & Claydon Surgery, where the IDP refers increased capacity for this locality being required as a result of committed and Joint Local Plan growth. Therefore, developer contributions via the Community Infrastructure Levy (CIL) may be required to meet the cost of additional health provision arising.

3. Summary

It will be essential that the above points are considered in conjunction with the current application process and infrastructure needs must be satisfactorily addressed in accordance with the respective infrastructure providers consultation replies and the IDP.

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA003.

The scheme is therefore supported by the Strategic Planning Team.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

From:Nathan Pittam
Sent:Tue, 13 Mar 2018 08:50:10 +0000
To:Gemma Pannell
Cc:BMSDC Planning Area Team Green
Subject:DC/18/00861: EH - Air Quality

Dear Gemma

EP Reference : 238597

DC/18/00861: EH - Air Quality

Land To The East Of, Ely Road, Claydon, IPSWICH, Suffolk.

Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I believe that the proposed scale of development is unlikely to result in a deterioration of the existing good air quality experienced in and around Claydon.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Consultation Response Pro forma

1	Application Number	DC/18/00861 Land to the East of, Ely Road, Claydon	
2	Date of Response	13/03/18	
3	Responding Officer	Name:	Karolien Yperman
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
4	Summary and 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.	The Heritage Team has no comments to make on this proposal.	
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.		
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		

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.

From: Iain Farquharson
Sent: 21 March 2018 15:10
To: BMSDC Planning Area Team Green
Subject: M3 238598: MSDC Planning Consultation Request - DC/18/00861

Dear sir/Madam

This department does not object to the proposal but we request a suitably worded condition is included should permission be granted to ensure the best possible standards in terms of sustainability can be achieved

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 (as per policy CS3 SO8 and NPPF para 35) 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). Details as to the provision for electric vehicles should also be included. This document shall be submitted to, and approved in writing by, the Local Planning Authority before construction commences.

Thank you

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

BB01449 724878 / 07860 827027
//iain.farquharson@baberghmidsuffolk.gov.uk

From: Nathan Pittam
Sent: 03 April 2018 09:34
To: Gemma Pannell
Cc: BMSDC Planning Area Team Blue
Subject: DC/18/00861: EH - Land Contamination

Dear Gemma,

EP Reference : 238596
DC/18/00861: EH - Land Contamination
Land To The East Of, Ely Road, Claydon, IPSWICH, Suffolk.
Outline Planning Application (with means of access to be considered) -
Erection of up to 74 dwellings, public open space and supporting site
infrastructure including access.

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

Kind regards

Nathan

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

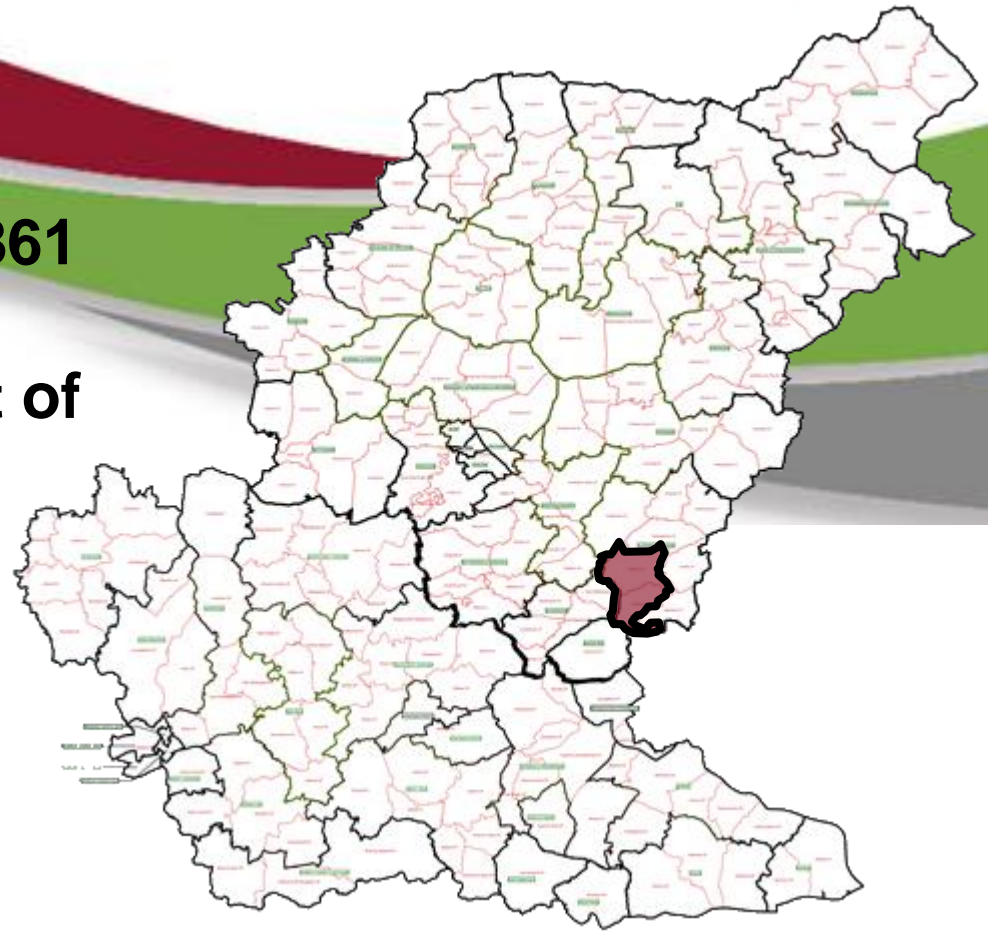
Babergh and Mid Suffolk District Councils – Working Together

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

Application No: DC/18/00861

**Address: Land to the East of
Ely Road Claydon**

Page 219



OUTLINE application

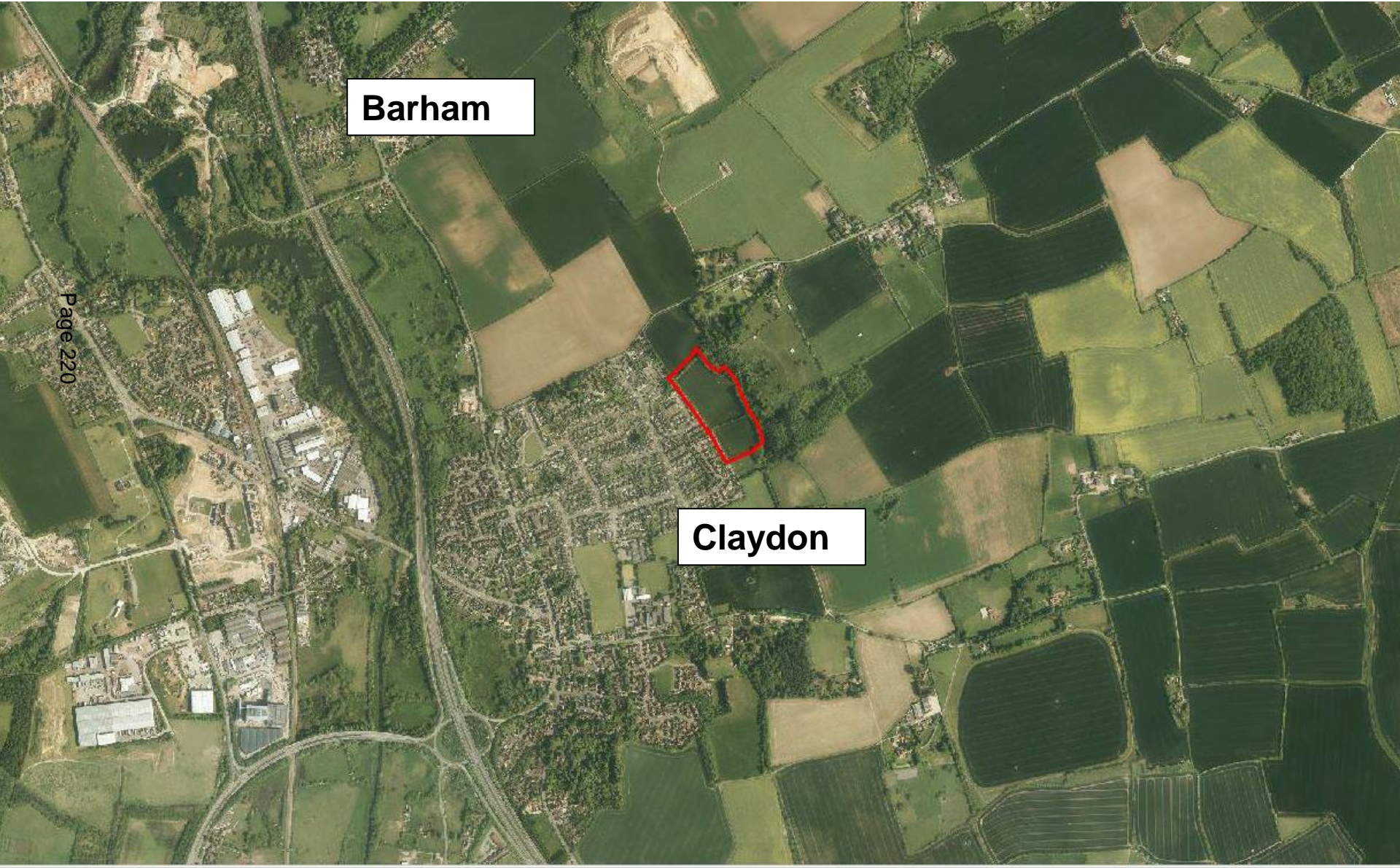
Residential – 67 dwellings

Open space

Ecology enhancements

**All matters reserved except
ACCESS to be considered**








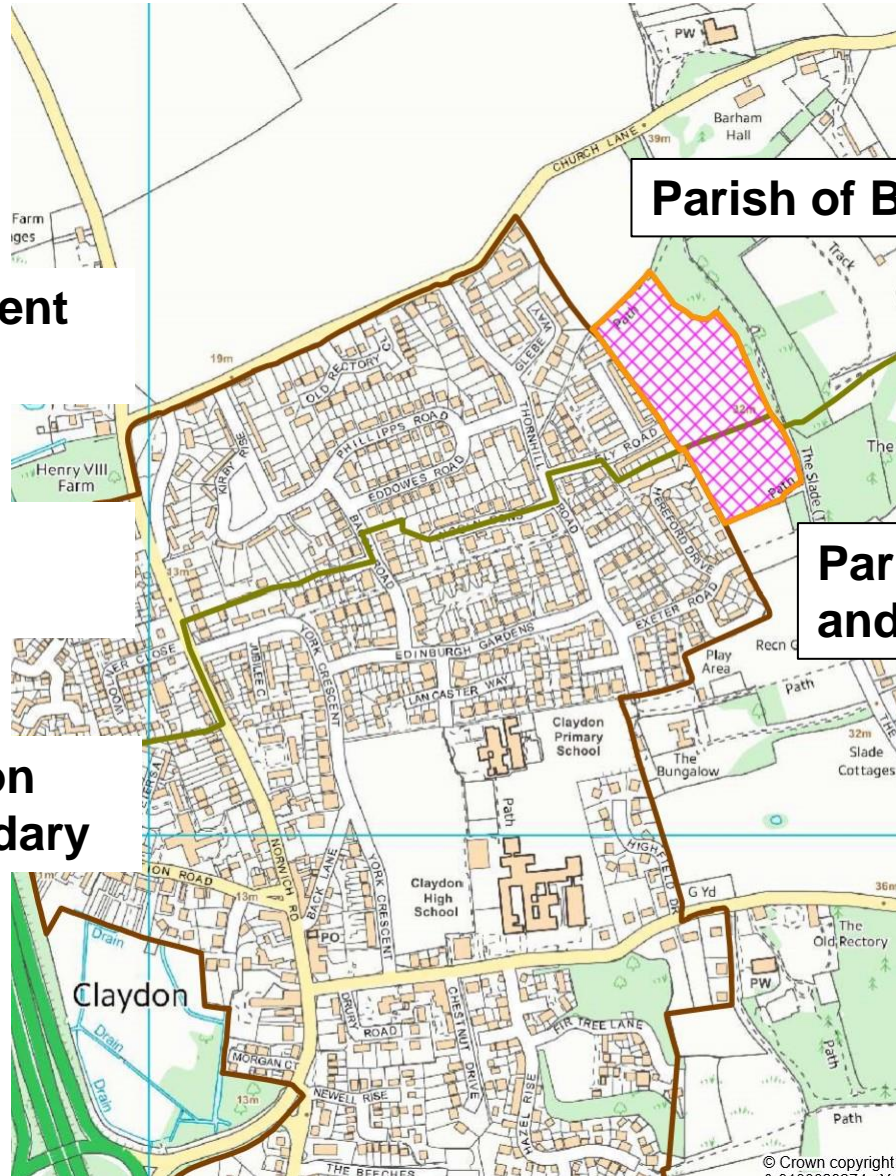
Barham

Claydon



Key

-  **Development boundary**
-  **Parish boundary**
-  **Application site boundary**

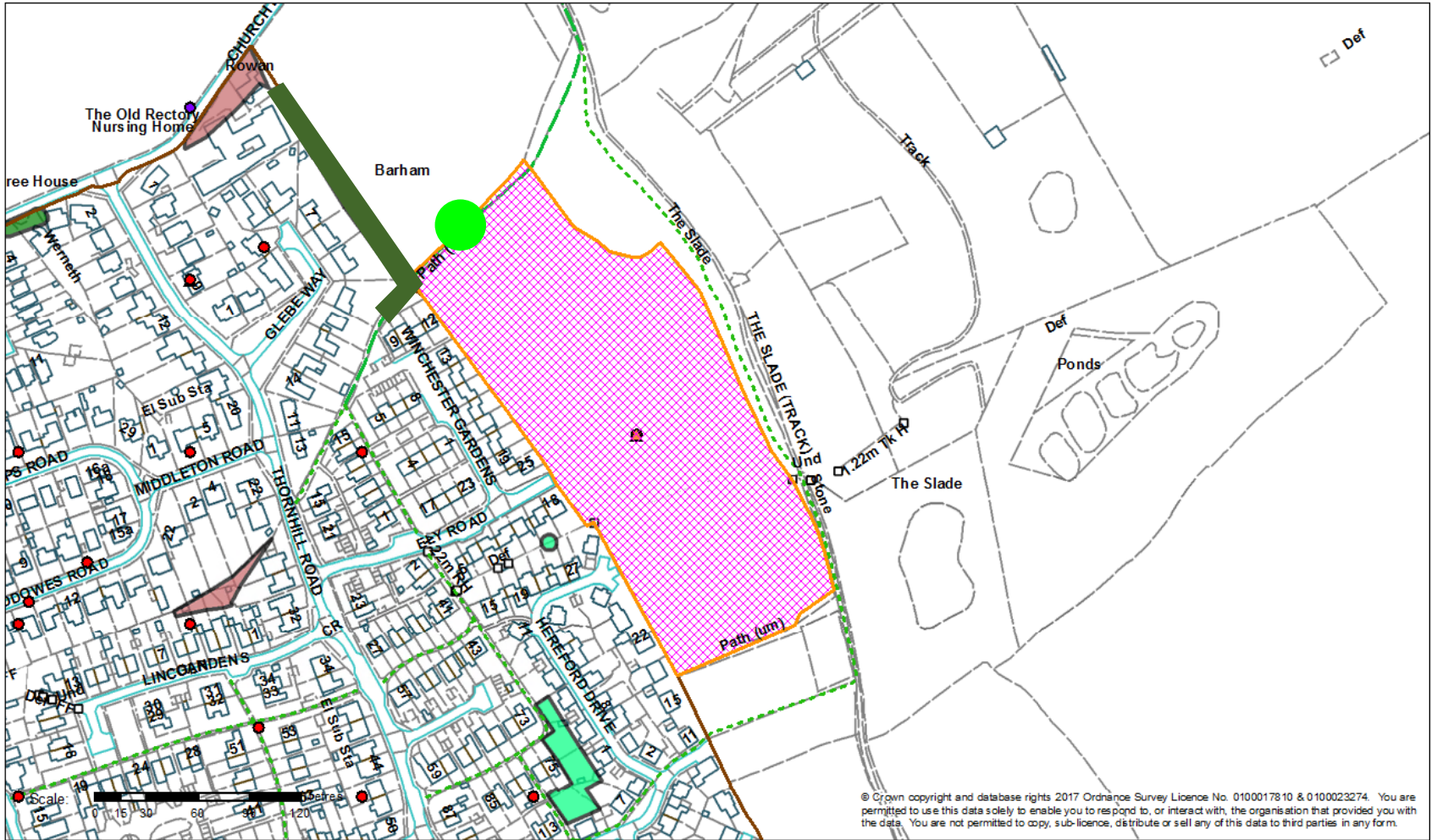


Parish of Barham

Parish of Claydon and Whitton

Constraints Map

- TPOs**
-  TPO - Individual TPO/Area of trees/trees
 -  TPO - Woodland
 -  TPO - Group of Trees

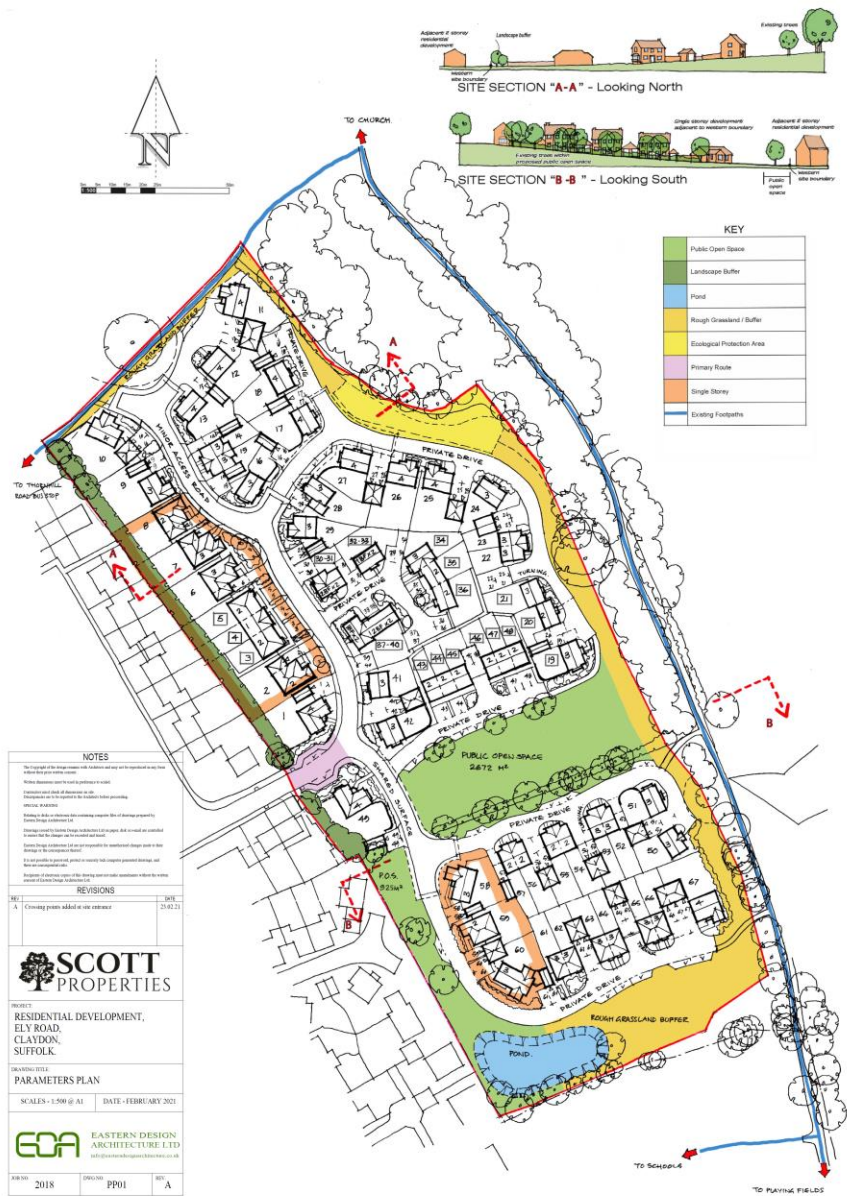


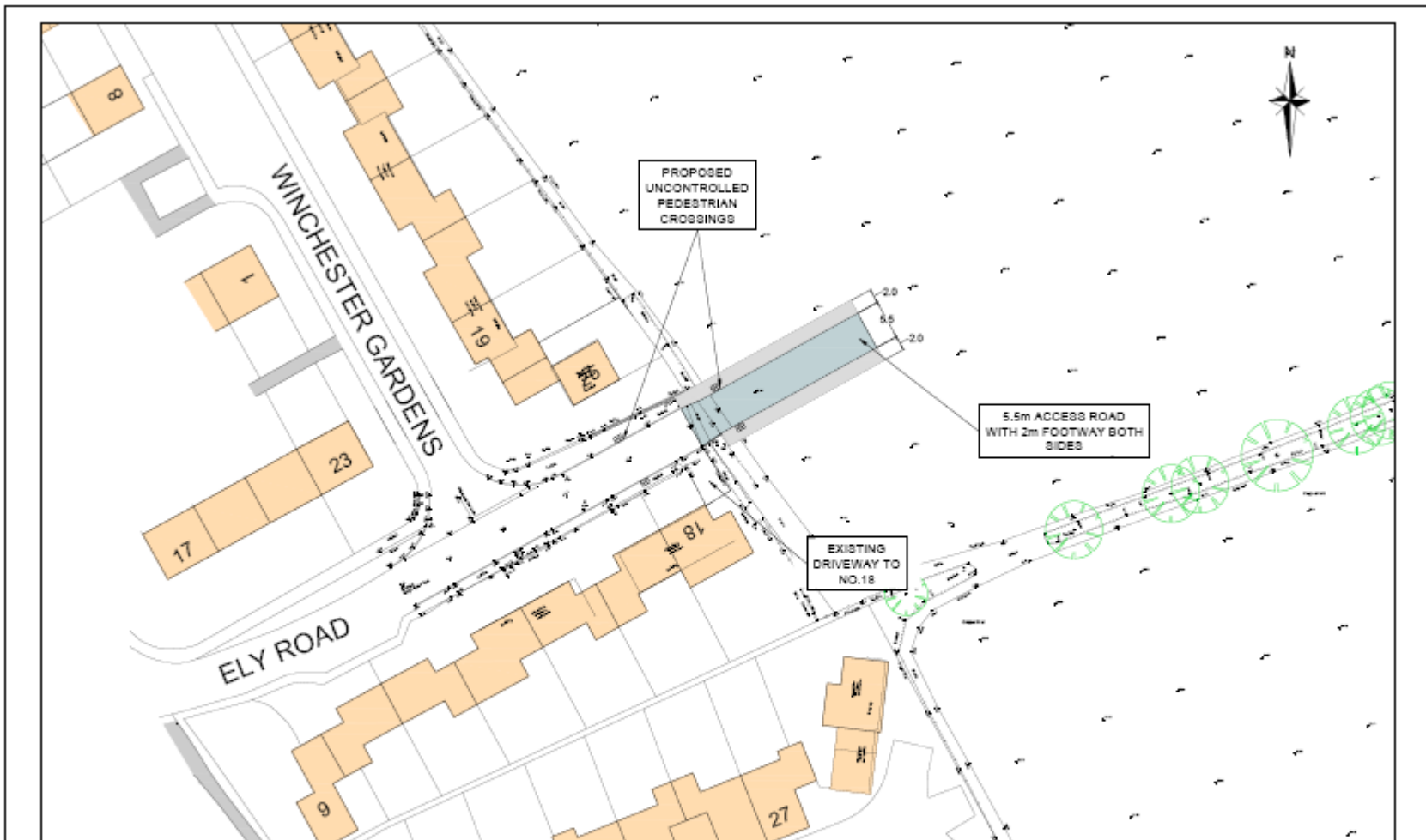
Amended Sketch Site Layout

Slide 6



Amended Parameter Plan





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PROJECT TITLE		CLIENT		DATE		CLIENT	
LAND EAST OF CLAYDON		M SCOTT PROPERTIES		NOV 2017		CANNON CONSULTING ENGINEERS Cambridge House, Kenford, Newmarket, Cambs, CB8 7PN Tel: +44 (0)1638 555 107 info@cannonce.co.uk www.cannonce.co.uk	
DRAWING TITLE		DESIGNED	DRAWN	CHECKED	PASSED	SCALE @ A1	ISSUE STATUS
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